ALPHA BANK

ANNUAL REPORT

For the period from 1 January to 31 December 2020

(In accordance with Law 3556/2007)

Athens, 23 March 2021

TABLE OF CONTENTS

Statement by the Members of Board of Directors
(in accordance with article 4 paragraph 2 of Law 3556/2007)

To the best of our knowledge, the annual financial statements that have been prepared in accordance with the applicable accounting standards, give a true view of the assets, liabilities, equity and financial performance of Alpha Bank A.E. and of the group of companies included in the consolidated financial statements taken as a whole, as provided in article 4 paragraphs 3 and 4 of Law 3556/2007, and the Board of Directors' Annual Management Report presents fairly the evolution, performance and financial position of Bank, and group of companies included in the consolidated financial statements taken as a whole, including the analysis of the main risks and uncertainties that they face.

Athens, 23 March 2021

THE CHAIRMAN OF THE BOARD OF DIRECTORS	THE CHIEF EXECUTIVE OFFICER	NON EXECUTIVE MEMBER OF THE BOARD OF DIRECTORS
VASILEIOS T. RAPANOS ID. No AI 666242	VASSILIOS E. PSALTIS ID No AI 666591	ARTEMIOS CH. THEODORIDIS ID. No AB 281969

Board of Directors' Annual Management Report as at 31.12.2020

GREEK ECONOMY

During the first wave of the pandemic, Greece succeeded in containing the exponential spread of infections throughout March and April 2020 due to the early introduction of front-loaded containment measures. Following the gradual easing of the first generalized lockdown from May onwards, economic activity was progressively normalized in Q3 2020, which was reflected in the rise of real GDP by 2.3% on a quarterly basis. However, Greece witnessed a smaller q-o-q growth compared to the Euro area (+12.4%), as the weak performance of tourism-related activities in Q3 weighed on growth dynamics.

According to the last available data published by ELSTAT (provisional, seasonally adjusted figures), real GDP shrank by 11.7% y-o-y in Q3 2020, mainly fueled by the collapse of tourism during the summer months. The high dependence of domestic economic activity on inbound tourism is reflected in its significant direct contribution to GDP, estimated at 7.8% in 2019, while according to the World Travel and Tourism Council (WTTC), the total contribution is estimated to be above 20% (2019 data). The struggles of the tourism sector were particularly significant given its seasonal nature - the majority of travel receipts and arrivals typically take place in the third quarter of each year (59% of total travel receipts and 56% of total arrivals in 2019).

The European Commission, the International Monetary Fund (IMF) and the Greek Ministry of Finance foresee an incomplete rebound in 2021. More specifically, the European Commission (Economic Forecasts, Autumn 2020) projects an incomplete recovery in 2021 (5%). Similarly, the latest projections by the IMF included in the latest country report, (Country Report No. 20/308, November 2020) foresee a partial rebound in 2021 (5.7%). The projections provided by the Greek Ministry of Finance, included in the State Budget 2021, are now envisaging a mild rebound in 2021 by 4.8%.

The sizeable fiscal stimulus enacted by the government is estimated to have partially offset the negative consequences of the recessionary shock. Furthermore, the progress being made in developing and distributing effective vaccines should improve the outlook and boost confidence, paving the way for a virtuous cycle that is expected to take effect next year.

In addition, Greek Government securities are eligible for purchase under the European Central Bank's (ECB) Pandemic Emergency Purchase Programme (PEPP), which contributes to the maintenance of low borrowing costs. In 2020, Greece has successfully tapped the international debt capital markets five times, four of which after the Covid-19 outbreak: in February, April, June, September and October, through a 15-year, a 7-year and a 10-year bond issuances as well as though the reopenings of the 10-year and 15-year bonds, respectively, raising in a total of Euro 12 billion.

At the beginning of the year, the international rating agency Fitch upgraded the debt of the Greek Economy to BB with positive prospects. Due to the pandemic crisis, however both Fitch and S&P adjusted in April 2020 Greece's outlook from positive to stable, maintaining, however, the country's rating at the same level (S&P: BB-). In addition, in November 2020 the rating agency Moody's maintained Greece's outlook stable, while adjusting, the country's rating to Ba3 from B1. In parallel, the Athens Stock Exchange (ASE) General Index recorded a significant drop in 2020, by 11.7%, as containment measures weighed on investor sentiment, resulting in an increase in the degree of risk aversion.

According to the eighth Enhanced Surveillance Report for Greece of the European Commission (November 2020), Greece has significantly stepped up the pace of reform implementation in the past months. The reform of the Independent Authority for Public Revenues through the proposed implementation of a supplementary wage legislation, aims to enhance its capacity to attract and maintain high calibre staff. The Greek authorities are also advancing on a number of flagship privatization transactions, although others are delayed due to the pandemic. Furthermore, satisfactory progress has been made in the fields of fiscal-structural reforms, public administration and energy. The eighth Enhanced Surveillance Report for Greece served as a basis for the Eurogroup to decide on the release of the next set of policy contingent debt measures worth Euro 767 million.

The contraction of economic activity in 2020 and the measures implemented by the Greek Government in order to address the adverse impact of the pandemic, such as the suspension of VAT and social security contributions, the suspension of solidarity tax in the private sector payable in 2021, the provision of special purpose compensation to the employees in the sectors that have been affected by the pandemic, the support of the unemployed, etc., had a significant impact on the fiscal figures. According to the Budget 2021, the primary deficit of the General Government, in enhanced supervision terms, is estimated at 7.2% of GDP (Euro 11.8 billion) in 2020 and 3.9% of GDP (Euro 6.7 billion) in 2021, respectively. General Government Debt is expected to rise to 208.9% of GDP in 2020, before following a downward trend in 2021, reaching 199.6% of GDP, as a result, mainly, of the economic recovery, i.e. the increase of the denominator of the debt to GDP ratio.

The average Overall Industrial Production Index for the period of January - November 2020 decreased by 2.7% on an annual basis, compared to a milder decrease by 0.4% in the corresponding period of 2019. The manufacturing sector decreased in the same period by 1.8%. The Purchasing Managers΄ Index (PMI), stood at 46.9 points in December from 42.3 points in November and 48.7 points in October, remaining below 50 units for three consecutive months, a deterioration in the overall conditions across the sector.

The Economic Sentiment Indicator (ESI) stood at 91.5 points in December, recording a marginal increase, compared to the previous month (91 points), while it contracted significantly, compared to December 2019 (110.4 points). It is noted that, in December, the ESI index in the EU-27 increased by 2.8 points (at 89.5 points), on a monthly basis, while the corresponding index in the Eurozone countries increased by 2.7 points (at 90.4 points).

Despite the GDP contraction, attributed to the strict containment measures and the generalized lockdown in several sectors of the economy, residential property price growth dynamics in Q32020 remained resilient. According to the latest available provisional data by the Bank of Greece, nominal house prices (new index of apartment prices) remained on an upward trajectory in Q32020, rising by 3.2% y-o-y from 4.1% y-o-y in the previous quarter.

Inflation, based on the Harmonized Index of Consumer Prices (HICP), stood at -1.3% 2020, compared to +0.5% in 2019. According to the forecasts of the European Commission (Economic Forecasts, Autumn 2020), HICP is expected to increase by 0.9% in 2021, in line with the expected recovery of the Greek economy.

The unemployment rate stood at 16.7% in October, remaining stable on an annual as well as on a monthly basis. The number of unemployed decreased marginally by 0,1%, in October, compared to the same month of 2019, while the employed persons also decreased by 0,3% or 10 thousand people. These developments led to a reduction in the workforce and a further increase in the economically inactive population. The imposition of lockdown and the social distancing are directly related to the increase in the number of inactive population, since due to the Covid-19 pandemic, a part of jobseekers reported that they were not currently available for work and, therefore, in line with the definitions of the European Regulation, they are classified as inactive. According to the forecasts of the European Commission (Economic Forecasts, Autumn 2020), the unemployment rate is expected at 17.5% in 2021.

According to the Monetary Policy Report (December 2020) of the Bank of Greece, the profitability result of Greek banks (before taxes), in the first nine months of 2020, was loss-making, mainly due to the increase in credit risk provisions. The Capital Adequacy ratio for the Greek banks (total banking system), on a consolidated basis, stood at 16.3% in September 2020, whereas the corresponding Common Equity Tier 1 (CET1) ratio reached 14.6%.

Private sector deposits amounted to Euro 163 billion in December 2020, of which household deposits stood at Euro 126.3 billion and business deposits were equal to Euro 36.7 billion. The total deposits in the banking system (private sector and General Government deposits) amounted to Euro 173.5 billion in December 2020, recording an annual increase of 9%. The increase of "forced" savings (due to lockdown), as well as the increase of "precautionary" savings (due to high uncertainty for the future) of the private sector, contributed to the expansion of the deposit base in 2020.

The outstanding amount of total credit granted to the private sector amounted to Euro 141.6 billion at the end of December 2020, while the annual rate of change stood at +3.4%. More specifically, the annual rate of credit to non-financial corporations stood at 9.9% in December 2020. According to the Monetary Policy Report (December 2020) of the Bank of Greece, credit expansion to non-financial corporations was supported by financing programs of the Hellenic Development Bank, with guarantees (from the "Covid-19 Business Guarantee Fund") and interest rate subsidy ("TEPIX II") and also by financing of European Investment Bank. With regard to household credit, the annual rate of change of consumer and mortgage loans remained negative, showing however, signs of stabilization.

The management of non-performing loans (NPLs) further progressed in the first nine months of 2020. According to the provisional data of Bank of Greece, NPLs amounted to Euro 58.7 billion at the end of September 2020, reduced by Euro 9.8 billion compared to December 2019 and by Euro 48.5 billion compared to March 2016, when the highest level of NPLs was recorded. The decline in the stock of NPLs during 2020 is mainly due to loans' sales and write-offs amounting to Euro 6.8 billion and 1.7 billion, respectively. In addition, it is worth noting that the temporary suspension of installments for performing loans adopted by the Greek Government to support companies severely impacted by the pandemic led to the restraint of the inflow of new NPLs. The ratio of NPLs to total loans remains high not only overall (35.8% in September 2020), but also per loan category (39.5% for mortgages, 47.4% for consumer loans and 32.2% for the business loans portfolio).

INTERNATIONAL ECONOMY

In 2020 economic activity was catalytically affected by the outbreak of Covid-19 pandemic. The emergence and rapid spread of coronavirus has reversed the growth prospects of the global economy, intensified uncertainty of economic developments and worsened sharply labour market conditions. The spread of the Covid-19 pandemic led the world economy to the deepest recession in 74 years. Fiscal and monetary policy decision makers were being asked to manage a double shock both on the demand side, due to the sharp decline in private consumption and on the supply side, due to the disruption that had been caused in the supply chains. Additionally, this was the first time that so many and powerful economies on the planet had found themselves in "repression", as national governments have had to take measures to socially distancing and suspend economic activity in order to limit the spread of the coronavirus. Many countries, in their effort to boost their national economies have been forced to take exceptional fiscal measures in order to support their national health systems and to ensure employment and the continuation of entrepreneurship. At the same time, the major central banks, with their multiple interventions, focused on maintaining the accommodative monetary policy they adopted after the emergence of coronavirus. Undoubtedly, expansionary fiscal and monetary policy have helped alleviate, to some extent, the adverse effects of the pandemic crisis on the world economy in 2020.

Global GDP growth is estimated to shrink by 4.3% in 2020 (European Commission, Autumn 2020 Economic Forecast), from a 2.8% increase in 2019, while inflation to drop from 3.5% in 2019, due to reduced demand and lower international fuel prices. The weakening of international trade was significant, the volume of which, according to the Bank of Greece, was expected to decrease by 10.4% in 2020 (Interim Report on Monetary Policy, December 2020), due to the decline in both trade in goods and services. The Organisation for Economic Co-operation and Development-OECD (Economic Outlook, December 2020) predicts global GDP to increase by 4.2% in 2021, as the availability of vaccines against coronavirus, combined with supportive policies, will boost economic activity. However, GDP growth will be uneven among countries. China, the only major economy that avoided recession in 2020, will lead the way, with strong economic growth of 8%, according to the OECD, accounting for more than a third of projected global growth in 2021.

The most important factor that is expected to affect the evolution of the world economy is vaccines' speedy distribution. Their quick distribution in the countries and the vaccination of a sufficient number of citizens could give greater impetus to the economic recovery in 2021, especially in the second half of the year.

Additional factors that could negatively affect the outlook of the global economy are the new US President's policy regarding the trade relationship with China, the further deterioration in US-Iran relations, geopolitical tensions in various parts of the world, climate change, digitization and the development of the UK's future trade relationship with the European Union.

In the United States, in the third quarter of 2020, GDP growth rate recorded a spectacular increase of 33.4%, with private consumption and investment being the drivers of economic expansion, whereas the contribution of net exports and public consumption turned negative. GDP shrank by 31.4% in the second quarter, which is the largest recorded drop historically and by 5% in the first quarter, due to the decline in economic activity since last March, when social distancing measures were imposed in order to limit the outbreak of coronavirus.

According to the European Commission (Autumn 2020 Economic Forecast), GDP in the US is expected to shrink by 4.6% in 2020 and to recover by 3.7% in 2021. Inflation fell from 1.8% in 2019, to 1.2% in 2020 and is estimated to rise to 1.6% in 2021. In addition, the unemployment rate, which before the outbreak of the pandemic crisis was at its lowest point in 50 years, rose from 3.7% in 2019 to 8.1% in 2020, whereas it is projected to de-escalate to 6.2% in 2021.

The spread of Covid-19 pandemic forced the Federal

Reserve to cut its key interest rate in last March at 0-0.25%, in a coordinated move with the other G7 central banks. At the same time, it has taken measures to facilitate the flow of credit into the economy through securities purchases. In addition, at the end of March 2020, a fiscal package of 2.2 trillion dollars was approved, the largest in the US history, in order to support businesses and households, while in January 2021, the new US president proposed a new fiscal stimulus package of 1.9 trillion dollars. Highly expansionary monetary and fiscal policy, combined with limited spread of coronavirus, is expected to stimulate economic activity, which, according to the European Commission (Autumn 2020 Economic Forecast) is expected to reach pre-pandemic levels in early 2022.

EUROZONE

In the third quarter of 2020, based on seasonally adjusted data, GDP in the euro area (EA-19) shrank by 4.3%, on an annual basis, against a decrease of 14.7% in the second quarter, which is the largest since the beginning of the survey data and against a decrease of 3.2% in the first quarter. As far as GDP components by expenditure approach, the third quarter of 2020 was characterized by a significant decline, on an annual basis, in imports and exports (-8.9% and -8.7%, respectively), in gross fixed capital formation (-4.7%) and in private consumption (-4.6%), whereas public consumption moved in a positive territory (+2.1%).

The significant drop in GDP, in the first three quarters of 2020, demonstrates the catalytic effect on economic activity of the containment measures implemented by national governments, in the effort to limit the spread of Covid-19.

The European Commission (Autumn 2020 Economic Forecast) is forecasting a recovery of 4.2% in 2021.

Inflation, which has been in negative territory since August, fell from 1.2% in 2019, to 0.3% in 2020, due to weak demand and lower oil prices, while, according to the European Commission (Autumn 2020 Economic Forecast), is projected to rise to 1.1% in 2021.

The unemployment rate in the euro area stood at 8.3% in November, according to recent Eurostat data, showing that the employment support measures taken by national governments limited, to some extent, the increase in job losses. The unemployment rate is projected to rise from 7.5% in 2019 to 8.3% in 2020 and further to 9.4% in 2021 (European Commission, Autumn 2020 Economic Forecast).

The European Central Bank (ECB) has adopted a highly expansionary monetary policy, implementing unconventional measures to support the national economies and the banking system of the Euro area. On 18 March 2020, ECB announced the implementation of an exceptional pandemic asset purchase programme (Pandemic Emergency Purchase Program-PEPP) totalling EUR 750 billion, in addition to EUR 120 billion decided on 12 March 2020. However, this programme was further strengthened on 4 June 2020 by the additional amount of EUR 600 billion and on 10 December 2020 with EUR 500 billion, with the result that total aid would amount to EUR 1.85 trillion, while extending its duration from the end of December 2020 which was originally planned until at least the end of March 2022.

The European Commission has taken important initiatives to address the impact of the Covid-19 crisis. The adoption, in July 2020, of the "Next Generation EU" program, a Development Fund (or Recovery Fund) amounting to EUR 750 billion, with the aim of recovering and strengthening the resilience of the European economy after the pandemic crisis, through a combination of subsidies and loans to the States of the European Union, is an important step towards European integration. This program is part of the EU budget for the period 2021-2027, the total of which amounts to EUR 1.8 trillion. The disbursement of funds under the "Next Generation EU" program is expected to begin within the second half of 2021, with a significant portion of resources being directed to actions oriented towards green and digital transition.

COUNTRIES WHERE THE BANK OPERATES

Cyprus

Economic activity in Cyprus, according to available data from the Statistical Authority (CYSTAT), shrank by 4.4% (annual change, seasonally adjusted figures) in the third quarter of 2020, against a decrease of 12.3% in the second quarter and an increase of 1.5% in the first quarter.

The European Commission (Autumn 2020 Economic Forecast) estimates GDP growth rate to be negative by -6.2% in 2020 and to recover by +3.7% in 2021. Tourism, private consumption and investment are expected to be more burdened by the Covid-19 pandemic in 2020, while a significant increase in public spending is expected. The blow to the economy due to reduced inbound travel, especially from the United Kingdom and Russia which are the main tourist markets is expected to be a major one, as the direct and indirect contribution of tourism to Cyprus'

GDP exceeds 20%. According to the European Commission, GDP is expected to return to pre-pandemic levels in 2022.

Annual harmonised inflation, according to the country's Statistical Authority (CYSTAT), fell from 0.5% in 2019, to -1.1% in 2020, mainly due to falling energy prices and non-energy industrial goods, while, according to the European Commission (Autumn 2020 Economic Forecast), it is forecast to increase to 0.9% in 2021.

Public debt is projected to increase significantly from 94% in 2019, to 112.6% in 2020, due to fiscal measures to support the Cypriot economy and then to fall to 108.2% in 2021 (European Commission, Autumn 2020 Economic Forecast).

The current account deficit, according to the Central Bank of Cyprus, increased to EUR 784.2 million in the third quarter of 2020, from EUR 105.5 million in the corresponding period of the previous year, due to the significant reduction in the services surplus, even though the decrease in the trade deficit.

According to the European Commission (Autumn 2020 Economic Forecast), the current account deficit is expected to rise from 6.3% of GDP in 2019 to 10.4% in 2020 and fall to 10.1% in 2021. In particular, it is estimated that exports will decrease significantly more than imports, mainly due to the decline in the tourist product.

Romania

Romania's GDP, according to available data from the Statistical Authority (INSSE), decreased by 5.7%, on an annual basis, in the third quarter of 2020 (seasonally adjusted figures), compared with a larger drop by 10.2% in the second quarter, as the restrictive measures introduced in mid-March burdened economic activity.

According to the European Commission (Autumn 2020 Economic Forecast), GDP is expected to shrink by 5.2% in 2020, recording a negative rate of change after a decade of strong economic growth and to recover by 3.3% in 2021. Private consumption is expected to decline sharply in 2020, while net exports to make a negative contribution to GDP, as exports of goods and services are projected to decline more strongly than imports. On the contrary, the contribution of both public consumption and investment is expected to be positive, due to the increase in investment in construction.

Annual harmonised inflation, according to INSSE, fell to 2.3% in 2020, from 3.9% in 2019, while the European Commission (Autumn 2020 Economic Forecast) predicts that harmonised inflation to rise to 2.5% in 2021.

According to the European Commission (Autumn 2020 Economic Forecast), the government debt-to-GDP ratio is estimated to increase from 35.3% in 2019, to 46.7% in 2020 and to rise further to 54.6% in 2021, due to government measures to support the economy and increase pensions.

Additionally, the current account deficit increased by 1.1%, on an annual basis, to EUR 9.8 billion, in the period January-November 2020, according to the Central Bank of Romania (BNR). The widening of the trade deficit and the deficit of primary income balance, compared to the corresponding period of the previous year, more than offset the increase in secondary income surpluses and the service balance. The European Commission (Autumn 2020 Economic Forecast) estimates that the current account deficit will fall marginally from 4.7% of GDP in 2019, to 4.6% in 2020 and increase slightly to 4.8% in 2021.

Albania

The rate of GDP change in Albania, according to the available data of the Statistical Authority (INSTAT), was contracted by 3.5%, on an annual basis, in the third quarter of 2020, from -10.2% in the second quarter and -2.3% in the first quarter (non-seasonally adjusted data). Overall for 2020, the European Commission (Autumn 2020 Economic Forecast) estimates a recession of 6.8%, as the Covid-19 pandemic is expected to adversely affect private consumption, investment and tourism, on which Albania's economy is heavily relied.

It is noted that, in April 2020, the International Monetary Fund approved emergency aid of EUR 174 billion to meet balance of payments needs created by the pandemic crisis and following the powerful earthquake of 26 November 2019.

Annual harmonised inflation, according to the European Commission (Autumn 2020 Economic Forecast) is estimated to be 1.9% in 2020, while it is expected to rise to 2.1% in 2021.

With regard to public debt, the European Commission (Autumn 2020 Economic Forecast) predicts that from 66.3% of GDP in 2019 it will increase to 78.8% in 2020 and fall to 77.4% in 2021.

The current account deficit is also projected to increase from 7.6% of GDP in 2019 to 10.9% in 2020 and fall to 9% in 2021 (European Commission, Autumn 2020 Economic Forecast).

United Kingdom

GDP in the UK shrank by 8.6%, on an annual basis, in the third quarter of 2020, compared with a decrease of 20.8% in the second quarter and 2.4% in the first quarter of the year.

Investment and consumption (private-public) contributed negatively to the change in GDP in the third quarter, while net exports contributed positively, as the annual rate of decrease in imports was higher than that of exports. In the fourth quarter, GDP is estimated to shrink again, as the containment measures imposed in November are expected to weigh on economic activity, while for the whole year the European Commission (Autumn 2020 Economic Forecast) predicts GDP to shrink by 10.3%. It is noted that, according to estimates by other supranational organisations (OECD, IMF), the UK economy is expected to take one of the strongest blows among the world's major economies, while the Central Bank of England estimates that in 2020 the UK will experience the worst recession in 300 years. In an effort to mitigate the negative effects of the pandemic crisis, the Central Bank of England has adopted a highly expansive monetary policy. In particular, it reduced its base rate to a historically low level of 0.10%, while strengthening the asset purchase programme, which amounts to 895 billion pounds and is primarily focused on sovereign bond market. With regard to 2021, the trade agreement with the European Union and the consequent removal of uncertainty are expected to have a positive effect on the UK economy. On the contrary, the introduction of strict restrictive measures, from the beginning of January 2021 until at least mid-February, is expected to burden the GDP of the first quarter. The European Commission (Autumn 2020 Economic Forecast) predicts GDP to increase to 3.3% in 2021.

ANALYSIS OF GROUP FINANCIAL INFORMATION[1]

Alpha Bank Group has taken significant actions to respond to the challenges arising from the Covid-19 pandemic, and in parallel manage the Non Performing Exposures portfolio and clean-up its balance sheet. Since the beginning of the year, the Bank has raised low-cost funding through the ECB's Targeted Long Term Refinancing Operations (TLTRO III), reducing repo operations and increasing its deposits inflow, while in accordance with the strategic plan 2020-2022, completed the securitization transaction of receivables from non-performing loans and the carve-out of the Bank's NPE unit within 2020.

Furthermore, the Bank, considering the optimization of its corporate structure, completed within December 2020, the reorganization of the main companies of the Group under three pillars, based on their common activities. The first pillar includes companies operating in the financial sector in Greece, the second pillar includes companies operating in the financial sector in Europe and the third pillar includes real estate companies. The result of the transfer of the subsidiaries had no impact on the group's results.

On 31.12.2020, the Group's Total Assets increased by Euro 6.6 billion or by 10.4% compared to 31.12.2019, to Euro 70.1 billion from Euro 63.5 billion. This change is further analyzed in the increase of Cash and balances in Central Banks and at the same time the increase of the investment portfolio, as a result of the increase in Eurosystem funding and customer deposits.

Loans and advances to customers amounted to Euro 39.4 billion, compared to Euro 39.3 billion on 31.12.2019. The balance of Loans and advances to customers, before allowance for expected credit losses, amounted to Euro 48.5 billion on 31.12.2020, increased by Euro 0.5 billion, compared to 31.12.2019 which amounted to Euro 48.0 billion. Respectively, allowance for expected credit losses increased by Euro 0.4 billion, from Euro 8.7 billion to Euro 9.1 billion, as the write-offs significantly offset the loan impairments recognized in the year.

In Liabilities, on 31.12.2020 the balance of Liabilities to Credit Institutions amounted to Euro 13.1 billion, increased by Euro 2.8 billion or by 27.7% compared to 31.12.2019, as within the year 2020 the Bank subscribed to the ECB's Targeted Long Term Refinancing Operations (TLTRO III) raising funding of Euro 11.9 billion with three-year maturities, and replaced its previous funding from the Eurosystem while reducing its repo funding. Due to customers amounted to Euro 43.8 billion, increased by Euro 3.5 billion or by 8.6% compared to 31.12.2019, resulting to a loan-to-deposit ratio of 90%. (31.12.2019: 97%).

In addition, during 2020, the Bank issued under the Euro Medium Term Note Program a subordinated debt of nominal value Euro 0.5 billion. However, there was a decrease of Euro 0.4 billion from the securitization of consumer and shipping loans since the bank repurchased the bonds from third parties, resulting in the increase of the balance of Debt securities in issue and other borrowed funds by Euro 0.1 billion or by 12.3% compared to the end of the previous year.

The Group's Total Equity amounted to Euro 8.3 billion on 31.12.2020, decreased by Euro 0.2 billion compared

[1] According to European Securities and Markets Authority guidelines (ESMA), the definitions and precise calculations of the ratios are presented in the Appendix of the Annual Financial Report.

to 31.12.2019, due to the increased impairment losses while the Group's Total Capital Adequacy Ratio increased by 30 basis points and stood at 18.4% on 31.12.2020.

Regarding the results of the year, Group's profit after income tax remains at the same levels as in 2019, at Euro 104 million. Profit before income tax amounted to Euro 114.1 million, decreased by Euro 42.2 million compared to 2019, which amounted to Euro 156.2 million, impacted by Euro 329.1 million because of the increased impairment losses and provisions to cover credit risk despite the increase of Net operating results by Euro 287.0 million, from Euro 1,146.6 million on 31.12.2019 to Euro 1,433.6 million on 31.12.2020.

More specifically, the Group's Total income increased by Euro 258.5 million, to Euro 2,592.4 million compared to Euro 2,333.9 million during the comparative year. This change is mainly due to the increase in Gains less losses on financial transactions and Gains less losses on derecognition of financial assets measured at amortised cost, which amounted to profits of Euro 516.8 million and Euro 173.2 million respectively, resulting mainly from gains from sales of Greek Government Bonds.

Total expenses before impairment losses and provisions to cover credit risk decreased by 1.4% or Euro 16.9 million, from Euro 1,174.7 million on 31.12.2019, to Euro 1,157.8 million on 31.12.2020.

Impairment losses and provisions to cover credit risk on 31.12.2020, amounted to Euro 1,319.5 million compared to Euro 990.4 million on 31.12.2019. The current year's impairment losses have been affected by the impact of the global financial crisis caused by the Covid-19 pandemic on loan portfolios and the incorporation of loan portfolio sale scenarios which form part of the Group's plan to reduce non-performing loans.

Finally, the income tax of the Group amounted to Euro 10.1 million mainly affected by the change of the legal framework (L.4646/ 2019) regarding the non-taxation of profits from the sale of investments performed after 30.6.2020, as well as the partial reversal of a recognized provision due to the reassessment of the possibility of recovery of disputed receivables from withholding taxes.

OTHER INFORMATION

The Bank's Share and Shareholder Structure

Share

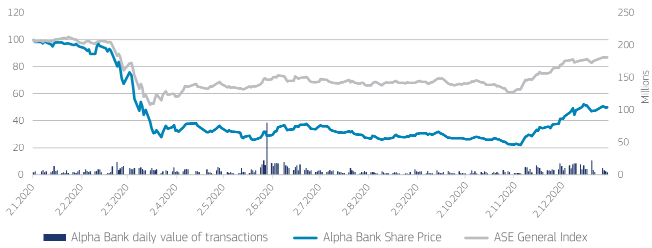
The Bank has been listed on the Athens Exchange since 1925 and is consistently classed as one of the largest companies in terms of market capitalization. At the end of 2020, the capitalization of the Bank stood at Euro 1,473 million and represented 5.04% and 29.94% of the capitalization of the Athens Exchange's General and Banking Indexes companies respectively, while the participation of its share in the FTSE/Athex Large Cap Index was 6.97%.

In addition to the Greek stock exchange, the share is also traded over-the-counter on the New York exchange in the form of American Depository Receipts (ADRs). The share is included in international indexes such as the FTSE All-World Index, the FTSE Med 100 Index and the FTSE4Good Emerging Index.

The share's daily trading volume for 2020 amounted to an average of 9,119,370 shares per session, increased by 76% versus previous year, with an average daily value of transactions of Euro 6,535,263.

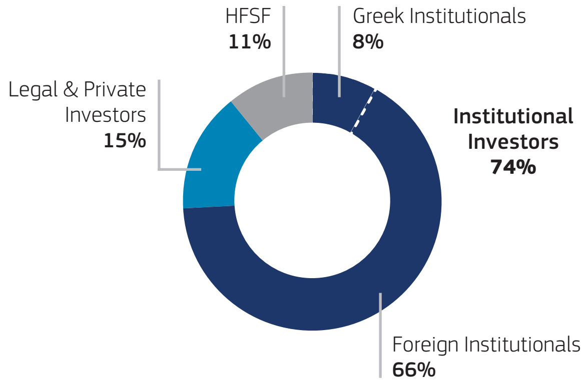
Share information for the Bank	2020	2019
Closing Price (year end, in Euro)	0.95	1.92
Highest Price (in Euro)	1.91	1.93
Lowest price (in Euro)	0.42	0.87
Market Cap (year end, in billion Euro)	1.5	3.0
Share's daily trading volume	9,119,370	5,170,047
Average daily value of transactions (in Euro)	6,535,263	7,686,071

Alpha Bank Share price evolution and turnover



Shareholder Structure

On 31.12.2020, the Bank's share capital stood at Euro 463,109,814.30 divided into 1,543,699,381 ordinary voting shares at a nominal value of Euro 0.30 per share. Out of these, 1,374,525,214 ordinary shares of the Bank are traded on the Athens Exchange, while the Hellenic Financial Stability Fund holds the remaining 169,174,167 ordinary, registered, voting, dematerialized shares or 11% of the total number of ordinary shares issued by the Bank. The shares in circulation on 31.12.2020 were held by approximately 115,000 Individual and Institutional Investors. The breakdown of the Bank shareholders on 31.12.2020 was, for descriptive (non-regulatory) purposes, as follows:



Most Important Decisions of the Ordinary General Meeting of Shareholders

Since in 2019 there were no distributable profits, the Bank's Ordinary General Meeting of Shareholders decided on 31.7.2020 the non-distribution of dividend to ordinary shareholders of the Bank, in accordance with article 159 of Law 4548/2018.

It is noted that, the aforementioned General Meeting approved the establishment and implementation of a five-year Stock Options Plan in the form of stock options rights by issuing new shares, in accordance with article 113 of law 4548/2018, to Members of the Management and of the Personnel of the Bank and its affiliated companies, within the meaning of article 32 of law 4308/2014. In addition, the General Meeting approved the assignment to the Board of Directors of the task to determine the beneficiaries, the terms of options' awarding as well as the remaining terms and conditions of the Plan, in accordance with the applicable regulatory and legal framework and the Bank's policies.

Following the above resolution of the Annual General Meeting of its Shareholders, the Board of Directors of the Bank, at its meeting dated 30.12.2020, in the context of the implementation of the Plan on the awarding of Stock Options Rights to Employees of the Bank and its Affiliated Companies, established by the above resolution and providing for the right to acquire newly-issued Shares of the Bank (Stock Options Plan) for the five-year period 2020-2024: (a) approved the Plan's Regulation and (b) awarded Stock Options Rights under the Performance Incentive Program (PIP) for the financial years 2018 and 2019 to identified Material Risk Takers (MRTs) of the Bank and its Affiliated Companies. In line with the Bank's Remuneration Policy, the Plan's goal is the payment of the variable remuneration's part that is payable in instruments (in kind), while at the same time aligning the Employees' incentives with the long-term interests of the Bank.

Number of Branches

On 31.12.2020 the Bank was operating with 325 branches, out of which 324 were established in Greece and 1 was established in Luxembourg. The branch in Luxembourg was established on 11.2.2020 and started its operation on 19.6.2020, in order to transfer all the activities of the London Branch, which was closed with the Registrar of Companies on 23 December 2020.

Corporate Events of the Bank in 2020

On 31.12.2020 the Bank announced the conclusion of a new exclusive distribution agreement with Assicurazioni Generali ("Generali") for the sale of non-life and health insurance products through its distribution channels. The agreement will have an initial term of twenty years and will be initiated with the effectuation of the transfer of AXA business in Greece to Generali, under the previous agreement between the Bank and AXA.

Other Corporate Events, are mentioned in the section «Prospects for the future».

Post Balance Sheet Events

On 10.1.2021, the Bank became fully registered with the new infrastructure 24/7/365 of the interbank pan-European payment system SEPA, following successful completion of the pertinent technical tests, in cooperation with the DIAS Interbanking Systems S.A.

Other post Balance Sheet Events, are mentioned in the section «Prospects for the future».

RISK MANAGEMENT

The Group has established a framework of thorough management of risks, based on best practice and supervisory requirements. This framework, based on the common European legislation and the current system of common banking rules, principles and standards, is improving continuously over time in order to be applied in a coherent and effective way in the daily conduct of the Bank's activities within and across borders, and making the corporate governance of the Bank effective.

The main objective of the Group during 2020 was to maintain the high quality internal corporate governance and compliance, within the regulatory and supervisory provisions on risk management, in order to ensure confidence in the conduct of its business activities through sound provision of financial services.

Since November 2014, the Group falls within the Single

Supervisory Mechanism (SSM) - the financial supervision system which involves the European Central Bank and the Bank of Greece - and as a major banking institution is directly supervised by the European Central Bank. The Single Supervisory Mechanism is working with the European Banking Authority (EBA), the European Parliament, the Eurogroup, the European Commission and the European Systemic Risk Board (ESRB) within their respective competences.

Moreover, since January 1st, 2014, the EU Directive 2013/36/EU of the European Parliament and of the Council dated June 26, 2013 along with the EU Regulation 575/2013/EU dated June 26, 2013 ("CRD IV"), are effective. The Directive and the Regulation gradually introduce the new capital adequacy framework (Basel III) of credit institutions, as amended with the Directive 2019/878 and the Regulation 2019/876.

In this regulatory and supervisory risk management framework, Alpha Bank Group continuously strengthens its internal governance and its risk management strategy, in order to achieve full compliance within the increased regulatory requirements and the extensive guidelines. The initiatives are related to the governance of data risks, the collection of such data and their integration in the required reports of the management and supervisory authorities.

The Group's approach constitutes a solid foundation for the continuous redefinition of Risk Management strategy through (a) the determination of the extent to which the Bank is willing to undertake risks (risk appetite), (b) the assessment of potential impacts of activities in the development strategy by defining the risk management limits, so that the relevant decisions to combine the anticipated profitability with the potential losses and (c) the development of appropriate procedures for the implementation of this strategy through a mechanism which allocates risk management responsibilities and accountability between the Bank units.

More specifically, the Group, taking into account the nature, the scale and the complexity of its activities and risk profile, has developed a risk management strategy based on the following three lines of defense, which are the key factors for its efficient operation:

- Business Units of retail, wholesale, wealth banking and NPEs Remedial Management, constitute the first line of defense and risk 'ownership' which identifies and manages the risks that arise when conducting banking business.
- Risk management, monitoring and control and regulatory compliance Units, which are independent from each other as well as from the first line of defense. They constitute the second line of defense and their function is complementary in conducting banking business of the first line of defense in order to ensure the objectivity in decision-making process, to measure the effectiveness of these decisions in terms of risk conditions and to comply with the existing legislative and institutional framework, by monitoring the internal regulations and ethical standards as well as the total view and evaluation of the total exposure of the Bank and the Group to risk, based on established guidelines.
- Internal Audit, constitutes the third line of defense. Internal Audit is an independent function, reporting to the Audit Committee of the Board of Directors, and audits the internal control activities of the Bank and the Group, including the Risk Management function.

CREDIT RISK

Credit risk arises from the potential weakness of debtors' or counterparties' to meet all or part of their payment obligations to the Group.

The primary objective of the Group's strategy for credit risk management, in order to achieve the maximization of the adjusted to risk performance is the continuous, timely and systematic monitoring of the loan portfolio and the maintenance of credit risks within the framework of acceptable overall risk limits. At the same time, the conduct of daily business within a clearly defined framework of granting credit is ensured.

The framework of the Group's credit risk management is developed based on a series of credit policy procedures, systems and models for measuring, monitoring and validating credit risk. These models are subject to an ongoing review process on order to ensure full compliance with the current institutional and regulatory framework as well as the international best practices and their adaptation to the respective economic conditions and to the nature and extent of the Group's business.

Under this perspective and with main objective to further strengthen and improve the credit risk management framework in 2020, the following actions have been implemented:

- Update of Credit Policy Manuals for Wholesale Banking and Retail Banking in Greece and abroad, taking into account the supervisory guidelines for credit risk management issues, the Group's business strategy as well as the special circumstances arised due to the Covid-19 crisis.

- Continuous strengthening of the second line of defense control mechanisms in order to ensure compliance with Credit Risks Policies at Bank and Group level, focusing on the management of the Bank and the Group's Customers who have been affected by the crisis due to Covid-19.
- Ongoing validation of the risk models in order to ensure their accuracy, reliability, stability and predictive capacity.
- Establishment of the Concentration Risk and Credit Threshold Policy which includes the principles and procedures that the Bank follows so as to manage the concentration risk, at Sector and Borrower/ Group of Borrowers level. Credit risk limits are set and monitored, defining the Bank's Credit Risk Appetite, for its aggregate credit risk, as well as for portfolios with shared credit risk characteristics, sub-portfolios and individual borrowers/ group of borrowers.
- Development of a Credit Policy, which defines the criteria and conditions for the evaluation of new lending to enterprises and self-employed affected by the Covid-19 pandemic.
- Implementation of new financing initiatives in order to support borrowers with short-term liquidity constraints to mitigate the impact of the pandemic, based on the Bank's participation in broader government schemes.

On the Commercial side (which includes Corporates, SME and SBP), the Bank participates in government support programs for new lending targeted at corporates, medium and small businesses. In particular, the Bank participates in the Entrepreneurship Fund II "Working Capital facilities with interest subsidy by the Hellenic Development Bank" - sub-programs 3 and 4. The Program provides companies, whose business activity is significantly affected by to the Covid-19 pandemic, financing with 100% interest rate subsidy from the Hellenic Development Bank for the first two years and at a reduced interest rate for the remainder of the loan, due to interest-free participation of funds of the Entrepreneurship Fund II (TEPIX II). In addition, the Bank participates in the A 'and B' cycle of the "Business Guarantee Fund Covid-19" Program of the Hellenic Development Bank. The aim of the program is the partial coverage of credit risk, by providing a guarantee from the Business Guarantee Fund Covid-19, for granting new working capital loans to enhance the liquidity of SMEs and Large Enterprises affected by the Covid-19 pandemic.

The Bank also participates as intermediary in other national and supranational enterprise development programs covering working capital and other credit lines (e.g. COSME and InnovFin loan guarantee facilities provided by the European Investment Fund, lending facilities in collaboration with the European Investment Bank and through NSRF 2014-2020).

These schemes allow the Bank to provide liquidity to performing borrowers at favourable financing terms, while taking on materially lower risk, thus containing the impact of the crisis on credit quality deterioration.

On the Retail side (which includes Mortgage, Consumer as well as SBP), both direct and indirect liquidity support measures have been announced by the government. This includes a government support scheme to subsidise the instalments of existing loans collateralized by a primary residence for a nine-month period and which extends across all Retail loans that qualify under the scheme. The scheme applies to borrowers of performing and non-performing status, with the extent of the government support amount increasing based on payment history to incentivise payment performance.

- Adoption of supportive measures for enterprises and individuals affected by the Covid-19 pandemic, concerning mainly changes to the schedule of payments of existing loans.
- Ammendement of the Group Loan Impairment Policy, in line with the EBA Guidelines "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/02), to incorporate the Forbearance Classification, the Unlikeliness-to-pay (UTP) assessment, the identification of Default and the Significant Increase in Credit Risk treatment of exposures affected due to Covid-19 effect.
- Implementation and completion of a Program of projects to ensure the Bank's compliance with the regulatory requirements deriving from the Guidelines on the application of the Definition of Default under Article of Regulation (EU) No 575/2013 (EBA GL/2016/07). The Bank and the Group Companies are expected to adopt the new Definition of Default and the Materiality Threshold, as defined in the relevant european regulation applicable by the 1st January 2021. Critiria are set for the default identification and the non-performing exposures' classification as well as for the exit to non-defaulted status.
- Design and implementation of a Program of projects for the incorporation of the EBA Guidelines on loan origination and monitoring (EBA/GL/2020/06). The guidelines are applicable from 30 June 2021 and apply to institutions' internal governance arrangement and procedures in relation to credit-granting processes, and

throughout the life cycle of credit facilities. Furthermore, these guidelines apply to the risk management practices, policies, processes and procedures for loan origination and monitoring of performing exposures, and their integration into the risk management frameworks.

- Initiation of the digitalization of retail credit decisioning framework project, through all retail banking product distribution channels.
- Issuance of the Wholesale Banking and Retail Banking Arrears and Forbearance Policies that include the policy rules and guidelines for the monitoring and management of announced exposures, as well as the framework of basic principles, rules and criteria governing the exposures forbearance assessment.
- Update of the Group Loan Collateral Policy, in order to enhance the collateral, and especially property, revaluation framework. Specifically, conditions for exclusion of properties from annual revaluation, either by indices or individually, are formalized, criteria for the selection of inspection type of individual assessment and triggers leading to the property revaluation earlier than the expected annual reassessment due to extraordinary events are defined, and moreover, a framework for calculating the immovable and intrinsic to the property machinery value in the collateral value is introduced.
- Update of the Credit Risk Early Warning Policy, in order to incorporate in the implementation perimeter of the Early Warning System the Bank's portfolios under Payment Moratoria due to Covid-19 pandemic.
- Update of the Group Write-off Policy regarding the write-off initiation and assessement process, due to the carve-out of the Bank's NPE platform and outsourcing of servicing to Cepal Hellas S.A.
- Design and implement initiatives in order to enhance the level of automation, accuracy, comprehensiveness, quality, reconciliation and validation of data, as part of the Bank's strategic objective of a holistic approach for the development of an effective data aggregation and reporting framework, in line with the Basel Committee on Banking Supervision (BCBS) 239 requirements.
- Enhancement of the mechanism for the submission of analytical credit data, credit risk data, and counterparties' data for legal entities financing in order to meet the requirements for the monthly submission of analytical credit risk data according to the European Union regulation 867/2016 and the Bank of Greece Governor's Act 2677/19.5.2017 (AnaCredit).
- Update of the EBA classification mechanism according to EBA Guidelines on management of non-performing and forborne exposures and technical standards amending Commision Implementing Regulation (EU) 680/2014.
- Periodic stress test exercises as a tool for assessing the impact of various macroeconomic scenarios on business strategy formulation, business decisions and the Group's capital position. Crisis simulation exercises are conducted in accordance with the requirements of the supervisory framework and constitute a key component of the Group's credit risk management strategy.

Additionally, the following actions are in progress in order to enhance and develop the internal system of credit risk management:

- Continuous upgrade of databases for performing statistical tests in the Group's credit risk rating models.
- Upgrade and automation of the aforementioned process in relation to the Wholesale and Retail banking by using specialized statistical software.
- Reinforcing the completeness and quality control mechanism of crucial fields of Wholesale and Retail Credit for monitoring, measuring and controlling of the credit risk.

Furthermore, the Group continued to enhance its risk management framework for the management of overdue and non-performing loans, through the update of policies for the management of overdue and non-performing loans, in addition to the existing obligations, which arise from the Commission Implementing Regulation 227/2015 of January 9, 2015 of the European Committee for amending Executive Committee Act (EU) No. 680/2014 of the Committee for establishing executive technical standards regarding the submission of supervisory reports by institutions. The framework of supervisory commitments for the management of overdue and non-performing loans from credit institutions is determined from the regulation (EU) No. 575/2013 of the European Parliament and the Council, as amended with the Regulation 876/2019 and Executive Committee Act of Bank of Greece 42/30.5.2014 and the amendment of this with the Executive Committee Acts 47/9.2.2015, 102/30.8.2016, 134/5.3.2018, 136/2.4.2018 and 175/2/29.7.2020 which they define.

For the management of overdue and non-performing loans the following initiatives are being implemented by the Bank:

a. Carve-out of current NPE platform and outsourcing of servicing to the affiliated entity Cepal Hellas S.A.
b. On 1st of December 2020 the Bank established a dedicated unit «Strategy Recovery and Monitoring of NPEs» which will be responsible for the monitoring of

Servicer's performance in relation to the goals set out in the NPE Plan. Furthermore, this unit will be responsible to prevent the NEW NPEs formation.

c. Continuous improvement of IT systems and processes in order to comply with the required periodic reporting to management and supervisory mechanisms.

LIQUIDITY RISK

Liquidity Risk comprises both funding liquidity risk and asset liquidity risk, although these two dimensions of liquidity risk are closely related. Funding Liquidity risk refers to the inability of a financial institution to raise the cash necessary to roll over its debt, fulfill the cash, margin, or collateral requirements of counterparties; or to meet capital withdrawals. Asset – market liquidity risk, results from the Bank's failure to recognize or address changes in market conditions that affect the ability to liquidate assets quickly and with minimal loss in value.

During 2020, customer deposits increased by Euro 4.0 billion. This is an 10.12% increase compared to 31.12.2019. Greek Government deposits, which are monitored separately, decreased by Euro 0.5 billion in the first half of 2020, thus amounted to Euro 0.4 billion as at 31.12.2020.

During 2020, the subsidiaries continued to enjoy increased liquidity. Their buffer on 31.12.2020 stood at the level Euro 0.854 billion for Cyprus and Euro 0.553 billion for Romania.

The European Central Bank, on the dates 7.4.2020, 22.4.2020 and 10.12.2020, announced a broad set of policy measures, in order to mitigate the economic impact of the coronavirus pandemic. Among these measures was the waiver to accept Greek sovereign debt instruments as collateral in Eurosystem credit operations. Greek Treasury Bills and Greek Government Bonds, are eligible to be used as collateral for ECB financing, even though they do not meet minimum ECB rating requirements. According to ECB, these measures recognize the recent progress achieved by the Hellenic Republic and the Greek banking system from the economic fallout of the pandemic, and helps funding access across the euro area.

On 24.6.2020, the Bank participated in the TLTRO III program which provides long-term financing with a conventional negative interest rate -0.5%. It is noted that the financing rate of this program can be set at -1% for the period from June 2020 to June 2022, provided that specific goals have achieved, regarding the amount of the Bank's loans granted for individual periods. In particular:

- If the amount of loans granted under the program, for the period March 2020 - March 2021, remains at the levels of March 2020, the interest rate will be -1% for the period June 2020 - June 2021 and -0.5% for the remaining duration of the financing.
- In addition, if the loans granted for the period October 2020 - December 2021 remain at the levels of October 2020, the borrowing rate can be set at -1% for the period June 2021 - June 2022.

Moreover, following the announcement of 10.12.2020, three additional dates for participation in this program were added (June, September and December 2021) and the borrowing allowance under TLTRO III was increased from 50% to 55% of eligible loans.

In this context, the Bank's financing from the Eurosystem, which stood at Euro 11.9 billion on 31.12.2020, significantly increased compared to 31.12.2019. This increased access to ECB funding, led to a decrease of the more expensive interbank repurchase agreements (repos) by Euro 5.84 billion. Through the financing of this program, the Bank managed to extend the duration of long term financing, as well as to improve the pricing conditions in relation to the repurchase agreements.

In order to ensure that the Banks are prepared to confront the crisis of the pandemic of Covid-19, Single Supervisory Mechanism requested an exceptional liquidity monitoring exercise conducted initially on a weekly basis and later on a monthly basis. From this exercise, SSM has not up to this point identified any specific issues.

In the context of the Internal liquidity Adequacy Assessment Process, the Bank reviewed the policies and procedures of the liquidity stress test scenarios.

The interbank financing (short, medium to long-term) and the Early Warning Indicators of the Bank, and of Group's subsidiaries are monitored on a daily basis, and analysis is performed in order to capture daily variations.

Taking into consideration the instability of the Greek economy and the new conditions due to the Covid-19 pandemic, liquidity stress test are conducted on a regular basis in order to assess potential outflows (contractual or contingent). The purpose of this process is to determine whether the existing liquidity buffer is adequate in order to cover Bank needs. These exercises are carried out in accordance with the approved Liquidity Buffer and Liquidity Stress Scenario Group policies.

INTEREST RATE RISK IN THE BANKING BOOK

Interest Rate Risk in the Banking Book (IRRBB) is the risk that examines how a change in base interest rates (i.e. Euro swap curve) will affect Net Interest Income of the Bank and the Fair Value of Assets and Liabilities (Economic Value of Equity). During 2020, interest rate risk of the banking book remained at relatively low levels and within risk appetite framework limits. This also includes subsidiary level limits. The change in net interest income and the change in economic value of equity, which results from a change in base interest rates, are calculated for internal and prudential stress scenarios on a regular basis. The relevant IRRBB stress results are presented to Treasury and Balance Sheet Management Committee, Asset Liability Management Committee, and Board Risk Management Committee.

The system used for IRRBB analysis is Sendero Data Management and Asset Liability Management system. The Bank is in the process of upgrading Sendero to a newer version. The User Acceptance Test of the new version is under progress to be finalized, in order for the new upgraded version to be on production during the first quarter of 2021.

Finally, the automated process of inclusion foreign Subsidiaries in the Sendero system is in progress, with the support of the IT Applications Division. This will result in better data quality for the subsidiaries due to the automated incorporation of their data into the aforementioned system.

MARKET, FOREIGN CURRENCY AND COUNTERPARTY RISK

The Group has developed a strong control environment, applying policies and procedures in accordance with the regulatory framework and international best practices, in order to meet business needs involving market and counterparty risk while limiting adverse impact on results and equity. The framework of methodologies and systems for the effective management of those risks is evolving on a continuous basis in accordance with the changing circumstances in the markets and in order to meet customer requirements.

Market risk is the risk of losses arising from unfavorable changes in the price or volatility of products with underlying interest rates, foreign exchange rates, stock exchange indices, equity prices and commodities. The valuation of bonds and derivative positions are monitored on an ongoing basis. Stress tests are conducted on a regular basis using extreme scenarios in order to assess the impact for each scenario on profit and loss and capital adequacy, in the markets where the Group operates.

A detailed structure for trading limits, investment limits and counterparty limits has been adopted and implemented. This structure involves regularly monitoring trigger events that could signal increased volatility in certain markets. This increased volatility means that a limit decrease is applied in these markets. The limits above are monitored on an ongoing basis and any limit breaches identified are reported officially.

For the mitigation of interest rate and foreign currency risk of the banking portfolio, hedging strategies are applied using derivatives and hedge effectiveness is tested on a regular basis.

In view of the Covid-19 outbreak, there was an increase in the market volatility during the first quarter of the year. The subsequent ECB monetary operations intervention improved the risk sentiment, and had a positive impact on the markets.

In the context of the application of the Internal Model Approach for the calculation of the capital requirements for the general market risk of the Trading Book, four overshootings were identified in scope of daily back-testing during March 2020, and the Governing Council of the European Central Bank granted permission to exclude them from the calculation of the back-testing addend for the calculation of capital requirements, because they are due to the advent of the Covid-19 crisis and the ensuing high market volatility.

During 2020, risk tolerance and risk capacity for Group FVOCI and AC bond portfolios were reviewed in order to accommodate business requirements and the increased bond price volatility observed. In the context of the Covid-19 outbreak, regulatory authorities requested extra reporting for market and counterparty risk that was implemented and is submitted according to the required timelines.

OPERATIONAL RISK

Operational Risk is defined as the risk of financial or qualitative negative effects resulting from inadequate or failed internal processes, IT systems, people (intentionally or unintentionally) and external events. Operational Risk includes legal risk.

In the context of its capital calculation process for Operational Risk, the Group implements the Standardized Approach and meets all the qualitative criteria required by this Approach.

During the second semester of year 2020, the Group implemented its Model Risk Management Framework and started designing an Information and Communication Technology (ICT) Risk Management Framework responding to the increased regulatory focus on these Operational Risk categories.

Furthermore, the Group continued with the implementation of the new operational risk (GRC) system which is expected to be completed within the fourth quarter of 2021.

The development of Key Risk Indicators (KRIs) as a control monitoring mechanism has been continued at the Group level. Concurrently, the operational risk events management processes have been further strengthened.

In line with the Group's established Operational Risk framework, the Risk and Control Self-Assessment (RCSA) procedure is implemented across the Group, according to the year 2020 annual plan. The RCSA procedure aims to identify and assess risks that may affect the operations and processes of the Banks' Units/Group Companies, recognize potential control gaps, as well as design and implement action plans for their remediation.

The evolution of Operational Risk Events, the RCSA results and all other Operational Risk related issues are closely monitored by the Group's responsible Operational Risk Committees, which are empowered to monitor and review the Group's Operational Risk exposures and ensure that appropriate measures for their mitigation are adopted.

MANAGEMENT OF NON PERFORMING EXPOSURES (NPES)

The Bank has set as paramount objective the effective management of NPEs, as this will lead not only to the improvement of the Bank's financial strength but also to the restoration of liquidity in the real economy, households and productive business sectors, contributing to the development of the Greek economy in general.

The Bank is preparing a revised NPE Business Plan which will be submitted on April 2021. In the context of the submission of the new strategic plan for the NPEs, the possibility of their further reduction will be evaluated, taking into account the tools that are expected to be available to the banks (e.g. «Hercules II»). At the same time, the Bank is closely monitoring the impact of Covid-19 on the quality of its assets, in order to avoid new non-performing exposures, taking into account the measures announced by the Greek Government.

Moreover, the implementation of the following initiatives are in progress:

- Through the dedicated unit «Strategy Recovery and Monitoring of NPEs» which was established on 1st of December 2020, in order to be responsible for the monitoring of Servicer's performance in relation to the goals set out in the NPE Plan. Furthermore, this unit will be responsible to prevent the new NPEs formation.
- Governance, policies and operating models through increased oversight and active involvement of the Management and the BoD with clear roles and accountabilities through the relevant Committees.
- Application of private and public Moratoria, offering installment postponement to debtors financially affected by the pandemic in order to restrain new NPE inflows and protect Asset Quality.
- Continuous monitoring of private and public Moratoria in order to secure that there will not be new NPEs formation.
- Effective human resources management focusing on know-how and training, which is further improved through attracting specialized executives.
- Strategic joint venture initiative with DoValue – in cooperation with the other Greek systemic banks an assignment agreement has been signed for the management of Non Performing SMEs exposures of approximately Euro 400 million over total SME's exposures of the Greek systemic banks of Euro 1.5 billion approximately. The aim of this common initiative of the Greek systemic banks is to tackle NPEs of Small and Medium Enterprises (SMEs), in cases where the banks have common clients, in coordination and with a uniform credit policy in order to provide common solutions.
- The ongoing implementation of a uniform management strategy for repossessed real estate properties through the roll out of AREMI, aiming at:
  - Monitoring the repossession procedure (asset on-boarding) and its assignment to the Group's subsidiary Alpha Astika Akinita A.E. or to other appropriate asset management agencies.
  - Monitoring the asset management operations through the Group's special purpose vehicles (SPVs).
  - Supervising and coordinating asset management and development.
  - Supervising and coordinating asset commercialization.
  - Setting and monitoring appropriate Key Performance Indicators (KPIs) for the asset management agencies (internal units and external collaborators).

The successful implementation of the Bank's NPE Strategy is affected by a number of external/systemic factors that include, among others, the following:

- Improvement of the economic environment at post Covid-19 era. Measures for individuals and small businesses are in place in order to reduce the economic impact from the pandemic.
- Restart of legal actions after their suspension due to

Covid-19, to support liquidations and serve as a credible enforcement tool for non-cooperative borrowers.

- Acceleration of Household Insolvency Law (L.3869) court hearings, through the e-platform that have been created for this purpose.
- The enforcement of new Insolvency Code (L. 4738/2020) will be in place until second quarter of 2021. The New Insolvency Code aims to tackle the private debt not only for entities but also for individuals, accelerating the procedures in order any case to be settled. It has to be mentioned that the new insolvency code transpose into Greek Law, the Directive (EU) 2019/1023 of the European parliament regarding preventive restructuring frameworks and discharge of debt. The efficiency of new insolvency code presuppose that there is in place the appropriate digital infrastructure and also the issuance of all the laws that will clarify the provisions of Insolvency code. The aforementioned procedure is in progress.

The Bank's full commitment towards the active management and reduction of NPEs over the Business Plan period is reinforced through the constant review and calibration of the Bank's strategies, products, and processes to the evolving macroeconomic environment.

On 17.7.2020, the Bank announced the completion of the disposal of a Greek SME NPE pool of loans of a total Gross Book Value of Euro 1.1 billion (the "Neptune Portfolio"), to Poseidon Financial Investor DAC, an entity financed by funds managed by affiliates of Fortress Investment Group LLC. The transaction, which is fully consistent with the Strategic Plan announced in November 2019, yielded a positive outcome in terms of capital adequacy and liquidity of the Bank.

In addition to the established initiatives to accelerate the reduction of its distressed portfolio, the Bank has presented its Strategy update, for the period 2020-2022, with one of the three major transformation pillars introducing a large-scale initiative regarding its current NPE landscape, namely "Project Galaxy". More specifically, "Project Galaxy" consists of an NPE acceleration plan which is expected to be completed in the Q2 2021 and aims to decisively reduce NPEs through a large-scale transaction within a comfortable capital envelope. The main parts of the abovementioned initiative are the following:

i. Front-loaded, substantial NPE reduction through a large securitization of Retail and Wholesale NPEs, making use of the Hercules Asset Protection Scheme (HAPS), resulting to immediate de-risking of the balance sheet (see chapter «Prospects for the future»).
ii. Carve-out of current NPE platform and outsourcing of servicing to the affiliated entity Cepal Hellas, to serve as the carve-out vehicle, that will be subsequently sold to a 3rd party investor.

The Bank aims in creating a market-leading servicer by combining the capabilities of Alpha Bank's and Cepal's servicing platforms. The servicer (hereinafter "New Cepal") will benefit from an appropriate execution capacity and a management team with significant experience in NPE management.

Following the creation of the "New Cepal", investor who will acquire a controlling stake of the new company and the Bank will enter into long-term SLA for the servicing of its Core NPEs. In addition to core and non-core portfolios as well as third party investor portfolios, "New Cepal" will also be able to service newly acquired portfolios in the future.

CAPITAL ADEQUACY

The Group's Capital Strategy commits to maintain sound capital adequacy both from economic and regulatory perspective. It aims at monitoring and adjusting Group's capital levels, taking into consideration capital markets' demand and supply, in an effort to achieve the optimal balance between the economic and regulatory considerations.

The overall Group's Risk and Capital Strategy sets specific risk limits, based on management's risk appetite, as well as thresholds to monitor whether actual risk exposure deviates from the limits set.

The objectives of the Group's capital management policy are to ensure that the Group has sufficient capital to cover the risks of its business, to support its strategy and to comply with regulatory capital requirements, at all times.

1. Supervisory Review and Evaluation Process (SREP)

On 28 December 2020, the ECB informed the Bank that according to its Supervisory Review and Evaluation Process (SREP) since 31st January 2021 the minimum limit for the Overall Capital Requirement (OCR) remains unchanged from 2020 at 14%. The OCR also includes the Pillar 2 requirement (P2R) of 3.0%.

2. Measures for Covid-19.

As per the announced regulatory measures by EBA and ECB, in view of the Covid-19 outbreak, European banking institutions are allowed to temporarily deviate from the minimum capital regulatory thresholds.

Specifically, on 12 March 2020, the European Central Bank (ECB) and the European Banking Authority (EBA) announced the following relaxation measures for the minimum capital requirements for Banks in the Eurozone:

- Banks are temporarily allowed to operate below the level of capital defined by the Capital Conservation Buffer and the Countercyclical Buffer. Furthermore at 28 July 2020, ECB announced through a press release that banks are allowed to operate below the aforementioned buffer requirements until at least end of 2022.
- Furthermore, the upcoming change under CRD5 regarding the P2R buffer was brought forward allowing the Pillar 2 Requirement (P2R) to be covered by Additional Tier 1 (AT1) capital and Tier 2 (T2) capital and not only by CET 1.

The European Commission decided to revise the existing regulatory framework by bringing forward regulations that would normally come with the CRR2/CRDV framework as well as provide a greater flexibility to the phase-in of the impact of the IFRS 9 on capital. These amendments aim to tackle the emergency situation and do not alter fundamentally the prudential regulatory framework. The revised framework was published in the Official Journal of the European Union in June 22nd 2020.

On 22 December 2020, EU Regulation 2176/2020 of the Council of 12 November 2020, amending EU Regulation 241/2014 concerning the deduction of software assets from CET1 capital, was published in the Official Journal of the European Union.

On 26th of June 2020 the Bank of Greece (BoG), announced through an executive committee act, that other systemically important institutions (O-SII) buffer for 2021 will remain stable at 0.50% for all Greek Banks.

The capital adequacy requirements set by the SSM / ECB and economic capital are used by the Group as the basis for its capital management. The Group seeks to maintain sufficient capital to ensure that these requirements are met.

3. IFRS 9 Capital Impact

Regarding the International Financial Reporting Standard 9 (IFRS 9), the Bank makes use of Article 473a of the Regulation No 2395/2017 of the European Parliament and of the Council amended by EU Regulation 873/2020, and applies the transitional provisions for the calculation of Capital Adequacy on both a standalone and consolidated basis. The Bank is adequately capitalized to meet the needs arising from the application of the Standard, which will be fully implemented at 2025. The impact from the full implementation is estimated at approximately 2.4% and the CET1 ratio would stand at 14.8% as of 31.12.2020, for the Group.

4. Capital Ratios

At the end of December 2020, the Bank's Common Equity Tier I capital (CET I) stood at Euro 7.8 billion, RWAs amounted to Euro 45.4 billion, resulting in a CET1 ratio of 17.3%, down by 64 bps versus 31.12.2019, affected mainly by the decrease in FVOCI revaluation reserve and the application of IFRS9 transitional arrangements for 2020.

On February 13th 2020, the Bank issued a Euro 500 million, Tier 2 bond with 10-year maturity callable after 5 years at a yield of 4.25%, listed on the Luxembourg Stock Exchange.

Following the recently agreement for the Galaxy transaction, on March 4th 2021 the Bank placed a Euro 500 million Tier 2 bond. The subordinated bond has a 10.25-year maturity and is callable anytime between year 5 and year 5.25 with a coupon of 5.5%. The bond is listed on the Luxembourg Stock Exchange - EuroMTF Market.

5. Deferred Tax Assets (DTAs)

Deferred Tax Assets (DTAs) at the end of December 2020 stood at Euro 5.3 billion. According to article 5 of Law 4303/17.10.2014 as amended by article 4 of Law 4340/1.11.2015 «Recapitalization of financial institutions and other provisions of the Ministry of Finance» deferred tax assets that have been recognized and are due to the debit difference arising from the PSI and the accumulated provisions and other general losses due to credit risk, which were accounted until 30.6.2015, are converted into final and settled claims against the Greek State. The above mentioned are set into force in case the accounting result for the period after taxes is a loss, according to the audited and approved by the Ordinary Shareholders' General Meeting financial statements.

In accordance with article 39 of CRR 575/2013 of the European Parliament and its Council, on precautionary requirements supervision for credit institutions and investment companies and the amendment of CRR 648/2012, a risk weight of 100% will be applied to the above mentioned deferred tax assets that may be converted into tax credit, instead of being deducted from regulatory capital.

On 31.12.2020, the amount of deferred tax assets which is eligible to the scope of the aforementioned Law for the Bank and the Group and is included in Common Equity Tier I amounts to Euro 3.03 billion and constitutes 38.7% of the Group's Common Equity Tier I and 6.7% of the respective weighted assets.

Any change in the above framework that will result in the non-recognition of deferred tax assets as a tax credit will have an adverse effect on the Bank's and Group's capital adequacy.

6. Capital Requirements under Pillar I

The approaches adopted for the calculation of the capital requirements under Pillar I are determined by the policy of the Group in conjunction with factors such as the nature and type of risks the Group undertakes, the level and complexity of the Group's business and other factors such as the degree of readiness of the information and software systems.

Capital Requirements for Credit Risk are calculated using the Standardized Approach (STA). The advanced method is used for the valuation of financial collaterals. For the Operational Risk capital requirements the Group follows the Standardized Approach (STA). For the Market Risk the Bank uses a Value at Risk (VaR) model developed at a bank level for the significant exposures and approved by the Bank of Greece. Additionally, the Bank uses the Standardized approach to calculate Market Risk for the remaining, non-significant exposures.

7. EBA Stress testing

EU-wide stress test is primarily focused on the assessment of the impact of risk drivers on the solvency of banks. Banks are required to stress a common set of risks (credit risk – including securitisations – market risk and counterparty credit risk, operational risk – including conduct risk). The EU – Stress Test is a biannual exercise. However due to the outbreak of Covid-19 (Coronavirus) and its global spread, EBA decided to postpone until 2021 the EU-wide Stress Test Exercise of 2020 to allow banks to focus on and ensure continuity of their core operations. For 2020, the EBA carried out an additional EU-wide transparency exercise in order to provide updated information on banks' exposures and asset quality to market participants. On 21.12.2020, SSM announced that the EU-wide Stress Test is expected to be launched in 29 January 2021 and its results will be published at the end of July 2021.

INTERNAL CAPITAL ADEQUACY ASSESSMENT PROCESS (ICAAP) AND INTERNAL LIQUIDITY ADEQUACY ASSESSMENT PROCESS (ILAAP)

The ICAAP and ILAAP processes are an integral part of the Internal Control System (ICS) of the Group. They are aligned with the best practices and the general principles and requirements set by the regulatory Framework, including the guidelines provided by SSM and/ or EBA. These guidelines allow for:

- The identification, analysis, monitoring and the overall assessment of risks to capital and liquidity.
- The improvement of various systems/ procedures/ policies related to the assessment and management of risks.
- The estimation of the necessary level of Internal Capital required for the coverage of all risks and the determination, management and monitoring of the liquidity buffer.
- Capital and liquidity planning taking also into consideration the Group's Risk appetite and business plan in a forward-looking assessment.

ICAAP and ILAAP are integrated into the business, decision-making and risk management processes of the Group, contributing to its continuity by ensuring its capital and liquidity adequacy from different but complementary perspectives (e.g. the economic perspective and the normative perspective), while both perspectives mutually inform each other and are integrated into all material business activities and decisions.

The Board of Directors has the overall responsibility of the ICAAP/ILAAP implementation with a clear and transparent assignment of responsibilities to the Risk Management Committee and Senior Management members. The Board, following the Risk Management Committee endorsement, approves the results of the ICAAP and the ILAAP and signs the Group's Capital Adequacy Statement (CAS) and the Liquidity Adequacy Statement (LAS).

The related reports are updated at least annually, or on a more frequent basis if material changes occur and are submitted to the Single Supervisory Mechanism (SSM) of the European Central Bank. ICAAP and ILAAP are assessed yearly by the ECB as part of the Supervisory Review and Examination Process (SREP).

DIGITAL TRANSFORMATION AND INNOVATION ACTIVITIES

The Bank identified early on the opportunities and challenges posed by the new digital era and consequently began elaborating its digital transformation program since 2017. The implementation of the program includes both operational levers and innovation focused initiatives and has been a key activity in 2020.

The digital transformation program, which ultimately focuses on the Customer Experience enhancement, entails the further strengthening of the Bank's digital channels, the reinforcement of the necessary digital infrastructure as well as the redesign of the key customer journeys.

During the pandemic, the Bank adjusted swiftly to the new reality through extended use of already existing digital services as well as through the development of new services aimed at addressing new customer needs that were created through the lockdown.

Indeed, during this period, the percentage of transactions at the branch level fell from 14% to 7%, whilst total e-banking transactions rose from 40% to 60%, recording a significant increase is relation to the pre-covid-19 period. At the same time, record high numbers were observed concerning new subscriptions as the number for March-April was double that of January-February 2020. Electronic issuing of debit cards rose from <15% to almost 25%.

December was a critical month as the bank offered its retail customers the opportunity to open a new account, get a debit card and subscribe to e-Banking in a matter of minutes through myAlpha Mobile - the bank's mobile banking app. It is a new and innovative service that offers improved customer experience. It is indicative that, in less than a months' time, there are more than 1.000 new customers that used the app to subscribe.

The Bank was first to launch the new Digital Business Onboarding service which offers business customers the opportunity to start a banking relationship with the bank without visiting a branch. The new service concludes a series of innovative digital services for business customers – such as the online document verification facility as well as the online subscription module for business customers – that are all aimed at meeting business customer needs through online tools. The Digital Business Onboarding service was the Gold Award at the E-volution Awards 2021, under the category "User Interface".

Alpha Bank was the first of Greek banks to offer its Visa and Mastercard clients the Garmin and Apple Pay services – a quick and easy way for contactless in-store payments, offering increased ease and security – through respective wallets. In addition, myAlpha Wallet, the Bank's own digital wallet has changed to become even easier to use for contactless in-store payments. Currently, all three wallets account for more than 150 thousand active users – a strong indication of customer engagement and satisfaction.

In view of continuous efforts to offer a better banking experience for all, the Bank activated the function of voice-guided transactions to support those with diminished eyesight, at 104 ATMs at 84 branches throughout the country. This service is offered for the first time in the Greek market and at such scale, thus offering the ability to customers to withdraw money or find out their balance by connecting the earphones to the ATM.

Through the new myAlpha Ραντεβού application, the bank presented a new, improved and easier way for scheduling a meeting with the bank. It is new service that targets further improvement of customer satisfaction whilst respecting the increased pandemic concerns.

The Bank also launched a new function through which a customer can receive and print an Asset Declaration certificate through e-Banking without visting a branch. The digital certificates generate automatically with no further actions from the customer.

The Bank actively continued to pursue the development of an open innovation ecosystem. Its second digital innovation competition (i3), open exclusively to Bank staff, launched in March 2020 and is still ongoing. More than 150 applications received from bank colleagues from around Greece. 10 teams were than formulated that were mentored by 29 mentors to develop further their ideas. The competition concluded through a digital Pitch-event with 3 winners.

FinQuest by Alpha Bank, aiming to identify innovative solutions in selected areas of interest is about to start in July looking to attract the interest of global fintech and start-up communities. This year's competition run for 4 months and attracted more than 70 participations from 13 different countries. 7 of them entered the acceleration were with the support of mentors the initial ideas were further developed. The Bank remains interested in innovative solutions from the national as well as international innovation ecosystem and offers the ability to promising solutions and startups to grow.

OPERATIONAL PLANNING AGAINST PANDEMIC (COVID – 19)

The Bank, following a close monitoring of recent developments about the pandemic, activated early on its Business Continuity Plan (BCP), to ensure a coordinated response to events that could potentially disrupt its business. In order to address the extraordinary situation of Covid-19 outbreak, a series of predefined actions were activated along with standard BCP procedures had to be adapted or/ and to be exceeded as well.

In order to mitigate risk, staff for critical functions were split and part of it transferred to the alternative operating spaces (BCP sites). Moreover, to ensure continuity of business and to prevent staff with the same skillset from being fully impacted, the majority of our employees in the central units worked from home during the critical period, without endangering critical functions or lowering appreciably the service standards of the Bank. Branch network staff were divided into teams, with one team working while the other stays at home, alternating at set periods of time.

Existing Remote access capability has been significantly upgraded and extended to Employees in the Branch Network. Moreover, additional hardware was provided to Bank's staff (branch network and central unit), allowing the successful and timely implementation of remote work, ensuring that all operations can be performed from alternate locations without interruption. This infrastructure will be maintained to deal with similar critical situations. At the same time, the Bank confirmed that BCP capabilities of a similar nature are in place with our critical suppliers / vendors covering people, process and technology, to ensure the continued flow of services and goods to the Bank and the Clients.

Additional steps have been taken to protect the health and safety of our employees and clients. The Bank, before the occurrence of coronavirus cases in Greece, established a set of precautionary measures including: international travel ban for business puproses and strong recommendation to avoid domestic travel, suspension of trainings with physical presence, replacement of in-person meetings with tele- or video-conference, adoption of cleaning and sanitization standards for our office and branch network premises complying to the official medical rulebook, and running multiple communication channels to promote all necessary preventive actions. The above measures were implemented as per the guidelines of the World Health Association and Greek local authorities.

The Bank monitors, from the beginning of the pandemic crisis until today, the Government's announcements regarding the restrictive measures and adjusts the way of working accordingly with consistency and responsibility to the Employees and their Families. The physical presence of the Personnel in the workplaces is fully harmonized with the instructions of the competent authorities in a way that ensures on the one hand the proper operation of the Bank and on the other hand the reduction of the risk of spreading the virus.

In addition, given the high rates of working remotely, training in new applications and collaboration tools is constantly expanding. At the same time, the content of the Intranet is enriched and actions are developed that aim on the one hand to make the work from home easier, and on the other hand to support the Employees in general with advice on health, fitness, personal development and the possibility of participating in actions of Culture and information, through a special section, about the news relevant to new coronavirus.

PROSPECTS FOR THE FUTURE

Developments in the Economy

The economic activity in Greece for 2021 is based on the following factors: Firstly, the extent to which vaccination programs will facilitate travels and will boost private consumption, and secondly, the activation of the EU-27 Recovery Plan ("Next Generation EU", NGEU).

The effectiveness of the vaccination programs, in Greece and in the origin countries of incoming tourists, will determine the degree of economic recovery and community mobility. A crucial parameter for the gradual recovery of tourism is the lifting of travel restrictions and the curbing of the need for social distancing measures. Return to normalcy in this field, however, is likely to take longer. The partial recovery of 50%-60% of the record performance of 2019 regarding tourist arrivals and receipts is considered to be a feasible target, provided that more favorable conditions dominate. This development could contribute, significantly, in the gradual decrease of the external payments deficit.

The access to the funds of the European Recovery and Resilience Fund (RRF), from the second half of 2021, could significantly enhance the country's growth dynamics. The investments expected to be implemented will be mainly directed to green and digital transitions. Over the period 2021-2026, the Greek economy is expected to benefit from a total amount of Euro 32 billion, of which Euro 19.3 billion will be grants and Euro 12.7 billion loans with favorable terms. More specifically, in 2021, Greece is expected to receive approximately Euro 2.6 billion grants through the Recovery and Resilience Facility, Euro 1.6 billion from the REACT-EU initiative, as well as Euro 1.3 billion loans.

Strategic priorities until the end of 2022

The Bank continuous the implementation of strategic plan which announced on 19 November 2019, for the period up to the end of 2022, the main priority of which is the acceleration of the procedures regarding its Balance Sheet's resolution.

The strategic plan includes, among others:

a) the accomplishment of a securitization transaction on receivables from non-performing exposures amounting up to Euro 10.8 billion («Project Galaxy»), which was completed on 30.4.2020 and the transfer of mezzanine and junior notes, which occurred from the securitization to third party investors.

b) the transfer of the non performing exposures servicing to the affiliated company "Cepal" (the "NPE Servicer"), which is a licensed, by the Bank of Greece, entity for the management of receivables from loans in accordance with Law 4354/2015.

   On 1st December 2020, the Bank completed the above carve out process, therefore from 1st December 2020, Cepal Hellas S.M.S.A is responsible for the management and servicing of the Bank's non-performing exposures (NPEs), including any future NPEs.

In this context, on 22 February 2021 the Bank has entered into definitive agreement with Davidson Kempner. In particular, the aforementioned agreement includes:

- The sale of 80% of its loan servicing subsidiary Cepal Holdings Single Member S.A. (hereinafter "New Cepal"). More specifically, an entity managed and advised by the Investor will acquire 80% of New Cepal's share capital, with the Bank retaining the remaining 20%. The Bank will maintain customary governance rights in New Cepal in line with its minority shareholding. Moreover, there will be an exclusive long-term servicing agreement with New Cepal for the management of its existing Retail and Wholesale Non-Performing Exposures ("NPE") in Greece of Euro 8.9 billion, as well as any future flows of similar assets and early collections. The term of this agreement will be 13 years, with a right to extend. Furthermore, New Cepal will also manage the Euro 10.8 billion exposures under the Galaxy Securitizations, and Euro 4.62 billion portfolios of third-party investors.
- The sale of 51% of the Mezzanine and Junior securitization notes of the Euro 10.8 billion NPE portfolio. It is clarified that, the Bank will retain 5% of the Mezzanine and Junior securitization notes, to comply with risk retention rules, and intends to distribute 44% of the remaining notes to shareholders, subject to regulatory and corporate approvals.

The above Transaction is expected to be completed in the second quarter of 2021.

c) the hive down of the banking activity sector of the Bank.

On 1.6.2020, the Board of Directors resolved to commence the demerger process through the spin-off (hive down) of the banking activity sector by the establishment of a new entity, in accordance with the provisions of article 16 of Law 2515/1997, Article 57 par. 3 and articles 59 to 74 of Law 4601/2019 and set the June 30th 2020 as the transformation balance sheet date of the hive down. It is noted that all actions taken by the Demerged Entity, following the transformation balance sheet date and are related to the sector of banking activity contributed, are considered to be performed on behalf of the new company. Moreover, all rights pertained by the HFSF will be maintained after the completion of the hive down.

In the context of the hive down, the banking activity sector of the Bank (Demerged Entity) will be contributed to the new entity, which will be licensed as a credit institution and will be a 100% subsidiary of the Demerged Entity. The Demerged Entity will retain activities, assets and liabilities, which are not related to the core banking activity and upon the completion of the demerger process, will cease to be a credit institution while its shares will remain listed on Athens Stock Exchange.

On 15 September 2020, the Board of Directors approved the draft split deed and its completion is subject to the required approval by the General Meeting of Shareholders of the Bank, as well as obtaining all necessary approvals from the competent authorities.

d) the inclusion of the securitization transaction under the program "Iraklis" of the Law 4649/2019 for the limitation of the impact of the securitization transaction on the Bank's capital adequacy and the derecognition of non-performing exposures.

It is noted that the Galaxy Transaction consists of three (3) Non Performing Exposures securitizations, code-named Orion, Galaxy II and Galaxy IV, with a total gross book value of Euro 10.8 billion. The Bank has submitted an application for the Hercules Asset Protection Scheme, in accordance with Law 4649/2019, regarding the Orion, Galaxy II and Galaxy IV securitizations, which have a gross book value of Euro 1.9 billion, Euro 5.7 billion and Euro 3.2 billion respectively. The application concerns the provision of a guarantee by the Greek State for the senior notes of the above securitizations with a total value of up to Euro 3,763 million.

The achievement of the above is dependent on the assessment and approval of independent third parties and regulatory and governmental authorities. In particular:

- The aforementioned transfer of 80% in New Cepal to the Investor is subjected to the prior approval by the Bank of Greece, under the relevant provisions of law 4354/2015 on the acquisition of qualifying holdings in licensed servicers operating in Greece. Such process entails, among others, a fit & proper test for the assesment of the Purchaser.
- Notwithstanding the express provisions of the Greek corporate transformation law (article 70 par. 1(a) of

law 4601/2019) that in case of spin-offs such as the Hive Down, administrative licenses, such as the banking license of the Bank, are transfer by virtue of law to the absorbing entity, the SSM has taken the view that the Good Bank should obtain a new license, for which the Bank has already applied. The issuance, however, of this new license requires the fulfilment of various conditions laid down in applicable laws, including the Greek banking law 4261/2014 and article 4 par. (1)(a) of Council Regulation 1024/2013.

- Further, the issuance of the new banking license, is a strict condition for the approval of the Hive Down (post shareholder authorization) by the Greek Ministry of Development.
- In addition to the above the Competition Commission might set additional requirements in its approach for the approval of the Investor.

It is clarified that, the Bank's strategic plan involves regulatory and execution risks and threfore, there can be no assurance that the Bank will achieve any of the anticipated benefits of the strategic plan in full or in the time frame currently envisioned. The Bank requires regulatory, governmental and corporate approvals for some aspects of the strategic plan and these may be delayed or withheld.

There is also no certainty that the strategic plan will be successful, and a range of factors outside the Bank's control, such as political and economic uncertainty or other factors affecting investor appetite, could negatively affect it.

Following the completion of the Galaxy Transaction, it is expected that the Non-Performing Loans in Greece will be reduced by 63% to Euro 4.7 billion.

The Non-Performing Exposures in Greece, is expected that will be reduced by 52% to Euro 8.8 billion, and the Non-Performing Exposures Ratio is expected to 24%.

The Total Capital Adequacy Ratio 18.4 per cent. as of 31 December 2020, is expected to be negatively affected by 280 bps due to the completion of Project Galaxy, without taking into account any effects from other factors.

The Bank also aims to issue bonds during 2021, main and subordinated, in the international markets, in order to achieve the strengthening of its Capital Adequacy and in compliance with any supervisory requirements. Such activities are in progress with the aim, the first issue of bonds to take place within the first quarter of 2021.

There is no guarantee that the bond issuance attempt will be successful as a number of factors beyond the Bank's control, such as financial uncertainty or other factors may affect investors' willingness to take risks.

The Strategic Plan also envisages a streamlining and optimization of the Group's operating expenses through a defined set of measures. These measures include, among others, measures to improve efficiency and productivity, the implementation of a new framework for the control of general and administrative (G&A) costs, and a reduction in the number of the Group's branches of around 20 per cent.

In addition, the Strategic Plan sets out Bank's intention to appoint new members to its top management team. A new governance framework will also be implemented, including: (i) clear delegation of authority from the Board of Directors to the Chief Executive Officer and from the Chief Executive Officer to the management team, (ii) empowerment and clear re-definition of the areas of responsibility of each member of Bank's senior management team, and (iii) a redefined structure and role for Bank's governance committees. These changes are intended to bring personnel with proven experience into Bank's management team and to enable faster decision-making at executive level.

In this context, the transformation project of the Bank and its operating model begun within 2020, on the one hand with the appointment of the General Manager - Chief Transformation Officer (CTO) on 1.4.2020 and on the other hand with the start of planning and implementation of a number of interventions and projects with the aim of enhancing the efficiency of the organization, optimizing the business model and further strengthening the systems for measuring and rewarding performance in all operations. The interventions and projects are designed and implemented by interdepartmental working groups under the coordination of the Transformation Office and the support of external collaborators where required. The actions are expected to have significant benefits to a number of the bank's operations and at the same time further enhance profitability, reducing operating costs and enhancing the effectiveness of the business model. The Bank maintains the strategic goal of reducing the ratio of operating expenses to income at levels below 50% in the medium term.

TRANSFORMATION PROGRAM

In 2020, the Bank launched a bank-wide Transformation program that will serve as the vehicle to deliver on the Strategy plan pillars: customer-centric growth, revamping of the Bank's operating model, and empowerment of the Bank's people. A dedicated Transformation Office is already fully operational to coordinate the efforts across the different areas in the Bank and ensure the successful delivery of the program. The program is currently focusing on the production of a detailed plan of initiatives that will provide the basis for successful implementation, in line with the bank's strategic targets. Implementation will start in Q2 2021.

The Bank is changing through the Transformation program, aiming to create more value for its customers, shareholders and employees. The bank is adopting a new, customer-centric approach, defined around the needs of the priority customer segments. Efficiency and productivity are increased through radical shifts in the bank's operating model, whilst digital channels and the digital product offering are strengthened. The Bank is creating a distinctive work environment, on the basis of meritocracy, talent empowerment and a strong employee value proposition. More specifically:

In Retail Banking, the Bank is shifting to a segments-based approach and culture, tailoring value propositions to the priority segments in order to better meet customer needs. The Bank is revamping its Retail distribution model, shifting transactions and services to digital channels, redeploying the front-line personnel capacity on creating value and improving customer experience.

In Wholesale Banking, the Bank will focus on the delivery of distinctive value propositions adapted to each segment, as well as a clear focus on improving capital profitability. The Bank is upgrading its digital product offering and enhancing customer experience by digitally transforming key customer journeys. A digitally-enabled service model for Wholesale customers will be deployed, shifting transactions and administrative work away from the branches, and empowering Relationship Managers with digital and remote servicing tools.

Through the Transformation, the Bank is redesigning end-to-end processes and introduces automation with an aim to streamline the cost structure of its platform. The lending process is digitally transformed end-to-end in both Retail Banking and Wholesale Banking with an aim to become a core competitive advantage. In addition, third-party spend is being optimized by rationalizing internal needs and centralizing procurement. The Bank is transforming its IT operating model by adopting new technologies and modern ways of working in order to increase efficiency, speed and quality.

Finally, the Bank is investing in its people. A new performance management system is being deployed, which promotes dialogue and continuous feedback, and which links performance to rewards and incentives. Special focus is put on talent management, through training and personal development plans as well as a strengthened succession planning program. Finally, having as a starting point its mission and values, the Bank is designing a unique employee value proposition in order to improve employee experience, as well as attract and retain talent.

All in all, the Transformation program fundamentaly changes the way that the Bank serves its customers, operates internally and supports its people. The new Bank will be more customer focused, more efficient and offer a distinctive environment for people to work in and grow.

CORPORATE RESPONSIBILITY

The Bank's activities are directly linked to society and citizens. It therefore seeks to contribute to the support of society and citizens, giving priority to culture, education, health and the protection of the environment. Responds with particular responsibility to issues related to the protection of the environment and the saving of natural resources and is committed to addressing the direct and indirect environmental impact of its activities.

The Bank follows specific policies for Human Resources with respect to the diversity of its Employees and the right to union membership and collective bargaining, while opposing any form of child labor, forced or compulsory labor. Ensures excellent working conditions and development opportunities as well as the health and safety of Employees in the workplace. Provides fair remuneration, based on contracts that are in line with the respective national labor market, ensuring compliance with the relevant national regulations on legal minimum wages, working hours, annual leaves and ensures the continuous training and education of its Employees. In addition, the Bank applies the principles of Corporate Responsibility in the whole range of its activities and seeks the compliance of its Suppliers and Partners with the values and business principles that govern its operation.

In 2020, the Bank, following a relative rating received by the FTSE International Organization, remained on the Financial Times Stock Exchange4Good (FTSE4Good) Index Series, even improving its rating compared to 2019. In particular, the results of the assessment showed that the Bank's performance remained at the same high levels as last year, while its performance in Corporate Governance improved.

TRANSACTIONS WITH RELATED PARTIES

According to the corresponding regulatory framework, this report must include the main transactions with related parties. All the transactions between related parties, the Bank and the Group companies, are performed in the ordinary course of business, conducted according to market conditions and are authorized by corresponding management personnel. There are no other material transactions between related parties beyond those described in the following paragraph.

A. The outstanding balances of the Group transactions with key management personnel which is composed by members of the Board of Directors and the Executive Committee of the Bank, as well as their close family members and the companies relating to them, as well as the corresponding results from those transactions are as follows:

(Amounts in thousand of Euro)

Loans and advances to customers	1,792
Due to customers	4,302
Employee defined benefit obligations	219
Provisions	650
Letters of guarantee and approved limits	2,159
Interest and similar income	38
Fee and commission income	8
Other income	1
Interest expense and similar charges	7
Commission expense	1
Fees paid to key management and close family members	5,826

B. The outstanding balances and the corresponding results of the most significant transactions of the Bank with Group companies are as follows:

i. Subsidiaries

(Amounts in thousand of Euro)

Name	Assets	Liabilities	Income	Expenses	Letters of guarantee and other guarantees
Banks					
1. Alpha Bank London Ltd	13,612	1,599	2,326		443
2. Alpha Bank Cyprus Ltd	27,514	141,857	4,722	892	47,511
3. Alpha Bank Romania S.A.	307,464	128,846	1,273	586	288,256
4. Alpha Bank Albania SH.A.	22,152	42,104	650	108	7,280
Leasing					
1. Alpha Leasing S.A.	184,297	3,437	5,591	104	15,000
2. ABC Factors S.A.	249,115	977	7,793	26	17,000
3. Cepal Hellas Holdings S.A.	130,212	272,970	842	10,309	
Investment Banking					
1. Alpha Finance A.E.P.E.Y.	445	15,273	960	982	
2. Alpha Ventures S.A.	1	2,956	16	9	
3. Alpha Ventures Capital Management - AKES		325	37	1	
4. Emporiki Ventures Capital Developed Markets Ltd		11,709			
5. Emporiki Ventures Capital Emerging Markets Ltd		10,681			
Asset Management					
1. Alpha Asset Management A.E.D.A.K	2,563	33,246	9,321	169	3
Insurance					
1. Alpha Insurance Agents S.A.	10	1,736	605		
2. Alphalife A.A.E.Z.	1,726	6,282	33,729	33,957	
Real estate and hotel					
1. Alpha Astika Akinita S.A.	7,506	85,035	38	7,374	
2. Alpha Real Estates Management And Investments S.A.	370	114,659	171	3,444	
3. Alpha Investment Property Attikis S.A.	8	154	13		
4. Alpha Investment Property Attikis II S.A.	1,872	263	66		
5. AGI-RRE Participations 1 Srl		153			
6. Stockfort Ltd		17,221		4	
7. Romfelt Real Estate S.A.		4,043		10	
8. AGI-RRE Zeus S.R.L.		1,152			

Name	Assets	Liabilities	Income	Expenses	Letters of guarantee and other guarantees
9. AGI-RRE Poseidon Srl		4,636		11	
10. AGI-RRE Hera Srl		940			
11. AGI-BRE Participations 2BG E.O.O.D.	170		43		
12. APE Fixed Assets A.E.	20	445	17		
13. AGI-RRE Cleopatra Srl		227			
14. SC Carmel Residential Srl		1,009		1	
15. Alpha Investment Property Neas Kifissias S.A.	13	1,075	21		
16. Alpha Investment Property Kallirois S.A.	8	620	8		
17. AGI-Cypre Tochni Ltd		9			
18. Alpha Investment Property Levadias S.A.	11	6,000	6		
19. Asmita Gardens Srl		6,531		14	
20. Alpha Investment Property Kefalariou S.A.	10	745	10		
21. Cubic Center Development S.A.		176			
22. Alpha Investment Property Neas Erythraias S.A.	10	5,593	54		
23. AGI-SRE Participations 1 D.O.O.	18,049		337		
24. Alpha Investment Property Spaton S.A.	10	1,042	9		
25. TH Top Hotels S.R.L.				1,048	
26. Alpha Investment Property Kallitheas S.A.	7	1,930	78		
27. Alpha Investment Property Irakleiou S.A.	6	52	5		
28. Alpha Investment Property Gi I S.A.			957		
29. AEP Industrial Property S.M.S.A.	8	17,124	6		
30. Alpha Group Real Estate Ltd		20,982			
31. Fierton Ltd	4,901	3	179		
32. AIP Residential Assets ROG S.M.S.A.	11	14,651	10		
33. AIP Attica Residential Assets I S.M.S.A.	10	895	8		
34. AIP Thessaloniki Residential Assets S.M.S.A.	7	3,143	6		
35. AIP Cretan Residential Assets S.M.S.A.	6	2,637	5		
36. AIP Aegean Residential S.M.S.A.	7	1,626	6		
37. AIP Ionian Residential Assets S.M.S.A.	6	2,202	5		
38. AIP Attica Commercial Assets S.M.S.A.	8	8,137	4		
39. AIP Thessaloniki Commercial Assets S.M.S.A.	6	9,980	5		
40. AIP Commercial Assets ROG S.M.S.A.		9,226			
41. AIP Attica Retail Assets I S.M.S.A.	8	7,750	7		
42. AIP Attica Retail Assets II S.M.S.A.	6	3,898	5		
43. AIP Attica Residential Assets II S.M.S.A	10	1,257			
44. AIP Retail Assets ROG S.M.S.A.	7	3,332	6		
45. AIP Land II S.M.S.A.	8	2,571	8		
46. Alpha Credit Acquisition Company Ltd	306,387	599	2,269		
47. Reoco Orion X S.M.S.A.	6	48	5		
48. Reoco Galaxy II S.M.S.A.	6	49	5		
49. Reoco Galaxy IV S.M.S.A.	6	48	5		
Special purpose and holding entities					
1. Alpha Credit Group Plc		610			
2. Alpha Group Jersey Ltd	339	15,300			15,542
3. Alpha Group Investments Ltd		19,424	11	8	
4. Ionian Equity Participations Ltd		5,730		6	
5. AGI-RRE Participations 1 Ltd	10,000	2,001			
6. Alpha Group Ltd			2,840		
7. Katanalotika Plc	(1,268)		123	2,302	
8. Epihiro Plc		1,080			
9. Irida Plc	409,148	208,182	11		
10. Pisti 2010-1 Plc		142			

Name	Assets	Liabilities	Income	Expenses	Letters of guarantee and other guarantees
11. Alpha Shipping Finance Ltd	(616)	618	3,763	5,950	
12. Alpha Proodos DAC			45	319	
13. Alpha Quantum DAC	(19,570)				
14. AGI-RRE Poseidon Ltd		5,539			
15. Umera Ltd	421,041	30,194	7,044	47	584
16. AGI-BRE Participations 4 Ltd		1,455			
17. AGI-RRE Ares Ltd		968		2	
18. AGI-RRE Artemis Ltd		3,752		5	
19. Zerelda Ltd		999			
20. AGI-Cypre Evagoras Ltd		10			
21. AGI-Cypre Ermis Ltd	711,492	28,951	17,535	2	402
22. Alpha International Holdings S.M.S.A.		642,321		110	
23. Alpha Holdings Single Member S.A.	4	54,768	10		
Other companies					
1. Kafe Alpha S.A.	6	328	21	227	
2. Alpha Supporting Services S.A.	787	20,044	1,181	1,054	
3. Real Car Rental S.A.		329			
4. Emporiki Management S.A.	30	2,250	68	5	
5. Alpha Bank Debt Notification Services S.A.	13	1,215	408	5,560	

ii. Joint ventures

(Amounts in thousand of Euro)

Name	Assets	Liabilities	Income	Expenses	Letters of guarantee and other guarantees
1. APE Commercial Property S.A.	10	207	5		
2. APE Investment Property S.A.	82	6,988	43	2	
3. Alpha Taneo A.K.E.S.		157			
4. Alpha Investment Property Commercial Stores S.A.	6	6,369	5		
5. Rosequeens Properties Srl	9,624		1,580		

iii. Associates

(Amounts in thousand of Euro)

Name	Assets	Liabilities	Income	Expenses	Letters of guarantee and other guarantees
1. AEDEP Thessalias and Stereas Ellados		339			
2. Banking information Systems S.A.	711	428	36		
3. Propindex AEDA		64			
4. Alpha Investment Property Eleona S.A.	54,168	9	2,719		
5. Cepal Hellas Holdings S.A.			2	5,844	
Total	**2,874,602**	**2,098,637**	**109,692**	**80,492**	**392,021**

C. Other related party transactions

The outstanding balances and the corresponding results are analyzed as follows:

(Amounts in thousand of Euro)

	Assets	Liabilities	Income	Expenses
Hellenic Financial Stability Fund – HFSF			4	

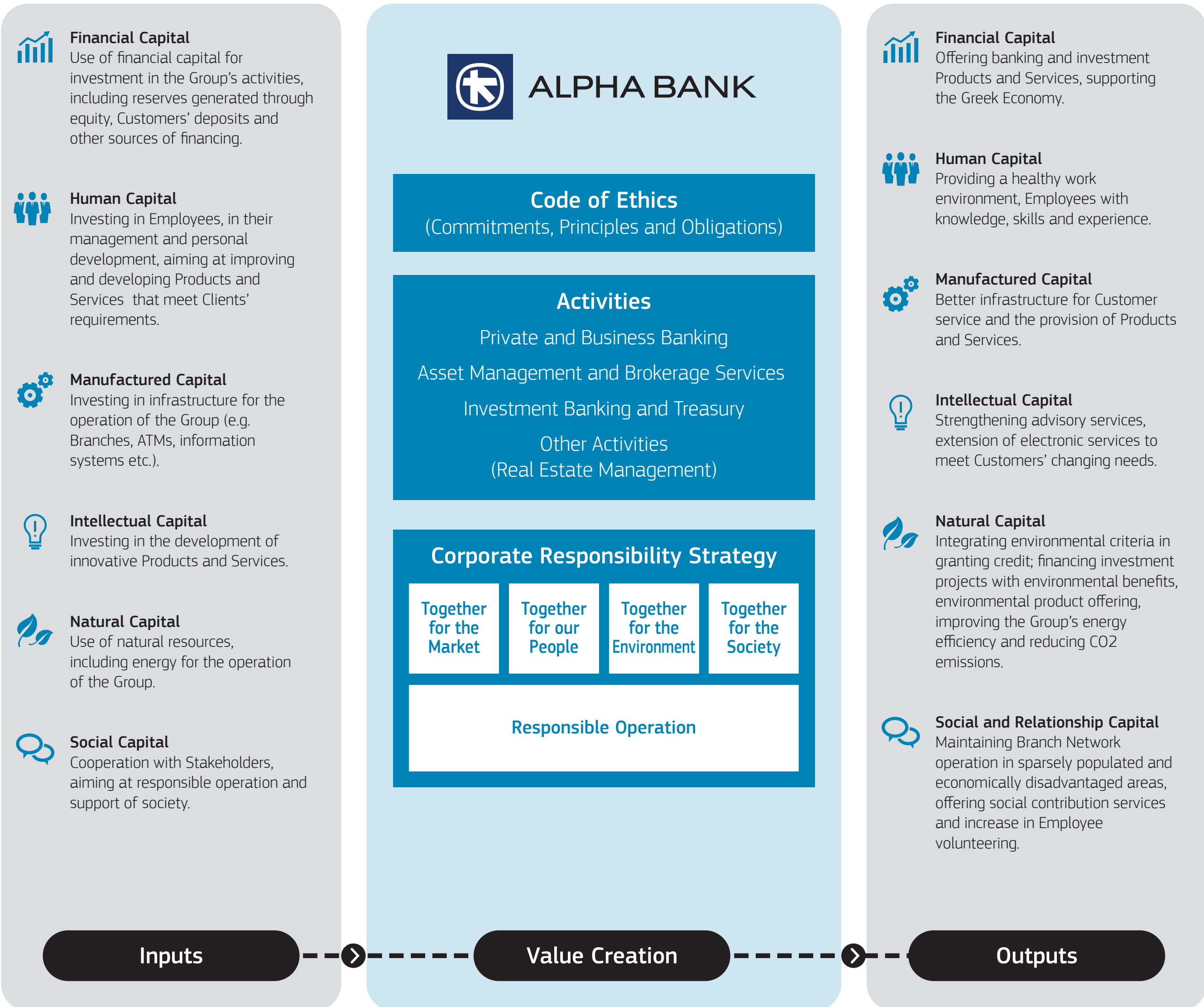
NON FINANCIAL REPORT

The Non Financial Report has been prepared in accordance with Law 4548/2018 and the General Electronic Commercial Registry's (GEMI) Circular 62784/2017. In addition, best international practices in the issuance of non-financial information have been applied, using recognized guidelines and frameworks (such as the Global Reporting Initiative (GRI) Standards).

Data have been collected by either the Bank's and subsidiaries' systems or relevant external files prepared by them. Detailed information and additional performance indicators for the Bank, together with information on the corporate responsibility activities of selected Group's subsidiaries, are presented in the Alpha Bank Sustainability Report 2020.

Business Model

The Business Model of Alpha Bank aims to create value for its Stakeholders. Alpha Bank invests in its Employees, in its network and infrastructures in order to develop and place on the market high quality services and products. It also works together with its Stakeholders in order to identify their requirements in a timely manner, to ensure its responsible operation and to support the society. Alpha Bank provides a healthy work environment, in which its Employees broaden their knowledge and skills and contribute to the development of new products and services. Alpha Bank supports the Greek economy, enhances its electronic services, offers products and services with specific social and environmental characteristics, and actively contributes to the society.



Business Model Alpha Bank

Covid-19 Response

Value creation for financial institutions is, inherently, closely tied to the level of economic activity in the countries it operates, as well as the overall financial environment. It is therefore inevitable that exceptional events, such as the current Covid-19 pandemic, which cause a severe strain on individual businesses and the economy at large, will also have a significant impact on the financial institutions. The deceleration of economic activity caused by the pandemic has created a series of effects, such as reduced turnover and profits for businesses and/or loss of income for employees in affected sectors, which in turn has impacted the ability of both businesses and individuals to meet their obligations for loan repayments.

However, a number of factors ensure that financial institutions can exhibit resilience against such impacts. Alpha Bank has been consistently performing exceptionally well in relevant stress tests, demonstrating the resilience of its business model and its prudent management of financial resources, maintaining healthy capital and liquidity buffers and avoiding exposure to excessive or uncontrolled risks.

The European Banking Authority has taken decisive measures to assist Banks in continuing to support their customers during the Covid-19 pandemic. The issued guidelines on the implementation of payment moratoria for customers affected by the crisis have provided an effective framework for Banks to assist their customers without incurring severe losses. Additionally, a temporary relaxation of capital requirements has been applied, allowing banks additional capacity to support businesses and households to financially recover.

Overall, Alpha Bank has exhibited a high degree of adaptability and resilience during the pandemic, assisted by both State and the Regulatory authorities, and was able to continue supporting the economy and its customers under a controlled stress of its balance sheet and profitability, without affecting the long-term viability of its business model.

By closely monitoring the international developments regarding the pandemic, Alpha Bank was able to take a proactive approach and activated its Business Continuity Plan (BCP) at an early stage, in order to ensure a coordinated response to any events that could potentially disrupt its operations. To handle the unprecedented circumstances of the pandemic, several BCP procedures and actions had to be modified appropriately.

To reduce the risks associated with Covid-19 in the workplace, personnel of critical operations were separated into smaller teams and assigned to alternative office locations. In addition, in order to ensure the continuity of business activities and to prevent the mass exposure of staff with similar skills to any health risks, the majority of staff at the central units worked from home throughout the critical periods of the pandemic in 2020 (March-May and November-December). Respectively, the staff of the Branch Network was divided into two groups during this period, which worked in alternating schedules. At the same time, the Bank confirmed that similar business continuity procedures were applied by critical suppliers and representatives, in order to secure the continuous flow of services and goods to the Bank.

The unprecedented conditions created by the Covid-19 pandemic required Alpha Bank to make bold decisions and take the appropriate measures in order to safeguard the health of Employees and their families, as well as the health of Customers. Due to the immediate mobilization and collaboration across all the Bank Units, Branch Network and Group Companies, it was possible to effectively apply a contingency plan for the pandemic. Alpha Bank followed all Covid-19 related national guidelines, and has consistently been in contact with specialists, doctors and experts, since the very beginning.

In order to monitor the Group's response to new challenges and to reach appropriate solutions that serve both business continuity and optimal service for customers, a cross functional team was set up. Moreover, strategic workforce planning was performed in order to address increased staffing needs across the Bank.

From the beginning of the pandemic, the Bank had created a designated page accessible by all employees though the Bank's intranet, in order to constantly upload guidelines, measures, actions and frequently asked questions regarding the pandemic. During this time, a list of safety measures and guidelines were put in force such as:

- Teleworking strategy for employees carried out immediately. In March, more than 85% of the employees from Central Units were working from home.
- Special purpose leaves were provided to employees, as per the Government guidelines.
- Enhanced technical support in order to handle more than 90% of respective requests from remote working employees.
- Provision of all necessary equipment (e.g. PC, monitors, laptops, etc.) for employees to work remotely.
- Medical support provided by health professional of the Bank.
- Covering medical expenses of testing for Covid-19 upon the occurrence of any employee symptoms. During the period following summer, Covid-19 testing was covered regardless of any show of symptoms and the Senior

Management teams including auxiliary personnel were tested every two weeks.

- Carried out extensive hygiene measures such as daily intensive cleaning of the premises, disinfection, maintenance and cleaning of the ventilation and air conditioning. In addition, antiseptics and protective masks have been distributed to all Employees.
- Since the summer the use of mask was made mandatory in the Branches and for employees in Central Units in case of interface or if social distancing is not possible.
- Advised precautionary measures focusing mainly on: a) frequent hand washing in combination with the use of antiseptics, b) keeping minimum distance of one and a half to two meters, c) seeking social distance where possible.
- Elimination of handling physical documents.
- Provision of psychological support provided by designated health professional in collaboration with the Bank. Employees are able to communicate with them regarding concerns, phobias or struggles related to Covid-19 situation.
- Enforcing the elimination of business travel. Business travelling abroad is forbidden, while domestic travelling is permitted only if absolutely necessary. Travelling for personal reasons is not recommended, while in case an individual travels all necessary precautionary measures need to be taken upon the individual's return.
- Strict meeting guidelines have been provided. Meetings should preferably take place using audiovisual media. In case physical presence is necessary, specific instructions should be followed such as proper room ventilation, adhering to the maximum number of persons per square meter allowed in the room and the required use of mask.
- In the event of a confirmed case of Covid-19 in the workplace, disinfection takes place and employees are required to avoid the premises for 14 days. In this case, employees of the Central Services are able to work from home. Branch employees would be required to stay home, while the Branch is disinfected and then operated by staff from other Branches.
- Advisory guidance on issues of mental and physical health are provided to all employees, as well as remote exercise sessions and nutrition advice.
- Customers are directed to alternative channels of operation, such as web, mobile and phone banking, in order to reduce their visits to branches. At the same time, the Bank has implemented interventions in processes and systems in order to allow for increased, secure servicing of customers through remote and digital channels.

Specifically, for the areas affected by Covid-19, both IT and Cybersecurity Divisions established necessary requirements based on the relevant risk and operational parameters to provide an effective and secure operating environment. The Board of Directors and the Executive Committee were informed and approved infrastructure capacity upgrades to effectively manage increased traffic and volumes due to teleworking.

Cyber Risk has not been significantly increased due to the pandemic. In that sense, security measures have been adjusted rather than revised to take any relevant threats into account (e.g. Phishing campaigns using Covid-19 as a subject).

Even though the Bank has not experienced severe threats or incidents due to Covid-19 related activities, as expected, Phishing and Fraud campaigns have increased. To address this and eliminate potential incidents, Alpha Bank has increased its awareness efforts and any technical measures to protect its employees and customers.

Employees and external staff systematically receive email notifications with specific instructions and advice, including information on teleworking threats, phishing and fraud attacks. In addition, all the Employees in Alpha Bank Group attended a cybersecurity awareness training program regarding the Cybersecurity and Information Security Framework (including teleworking and remote access principles).

In a similar way, customers are continuously informed of the increased threats from phishing and fraud campaigns through the Bank's Web Banking (pop-ups before and after login), website portal (dedicated banner and info pages), Facebook, Twitter and LinkedIn pages as well as through the newsletter.

Overall, Alpha Bank has increased the readiness of its Security Services. At the same time, the Bank's Computer Security Incident Response Team (CSIRT) collaborates with other globally appraised CSIRTs and with the Hellenic National CSIRT exchanging knowledge and threat related information (aka Indicators of Compromise) related to Covid-19.

Codes And Policies

Alpha Bank's fundamental policies in relation to environmental, social and governance issues are presented in the following table. Further details regarding Alpha Bank policies and corporate governance are included in the Corporate Governance Statement and the Annual Sustainability Report. It should be noted that the policies are available in a dedicated section at the Intranet (Internal websites existing for the Bank and each of the subsidiaries). Once a new policy or an updated policy is published, a corresponding circular is also uploaded in the Bank's intranet.

Fundamental Codes, Policies and Compliance Regulations applied by Alpha Bank

- Code of Ethics
- Corporate Governance Code
- Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders
- Diversity Policy
- Induction and Training Policy for the Members of the Board of Directors
- Policy for the Annual Evaluation of the Alpha Bank Board of Directors
- Remuneration Policy for Alpha Bank and the other Group Companies
- Senior Executives Severance Payment Policy
- Anti-Bribery and Corruption Policy
- Compliance Policy
- Operational Risk Management Policy
- Fraud Risk Management Policy
- Credit Risk Early Warning Policy
- Group Credit Risk Management Policy
- Group Market Risk Management Policy
- Group Environmental and Social Risk Management Policy on Legal Entities Lending
- Group Loan Impairment Policy
- Policy on the Prevention of Conflict of Interests
- Policy on Related Parties Transaction
- Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Policy
- Group Business Continuity Management Policy
- Outsourcing Policy
- Group Personal Data Protection Policy
- Corporate Responsibility Policy
- Policy and Procedure for the Provision of Financial Assistance (sponsorships)
- Group Environmental Management Policy
- Whistleblowing Policy and Procedures

In 2019, Alpha Bank, established a Remuneration Policy as per the provisions of Law 4548/2018 that applies to Members of the Board of Directors, General Managers and Deputy General Managers. The objective of the Policy is to promote sustainability and long-term prospects of the Bank's operations, enhance transparency and create value for the benefit of all stakeholders. The Board of Directors, in accordance with the Corporate Governance Code and the Policy for the Annual Evaluation of the Alpha Bank Board of Directors that has adopted, assesses on an annual basis its effectiveness as well as that of its Committees. During 2020, the overall evaluation of the Board of Directors and its Committees was conducted by a third party, with the assistance of the Corporate Governance and Nominations Committee, while the Individual Evaluation of the Members of the Board of Directors was conducted by the Chair of the Board of Directors.

Furthermore, a reassessment of the Board Members' collective suitability in terms of knowledge, skills and experience was conducted, based on the Joint ESMA/EBA Guidelines on the Assessment of the Suitability of Members of the Management Body and Key Function Holders with the support of the Corporate Governance and Nominations Committee.

Alpha Bank Group's organization and operation follow the best banking and business practices, which are accompanied by certifications in accordance with the most widely recognized International Standards (ISO 9001 Quality Management System, ISO 20000 Service Management System, ISO 22301 Business Continuity Management System, ISO 27001 Information Security Management System, ISO 14001 Environmental Management System etc.) in critical areas of operations. The certified management systems which the Group has in place are designed to enable it to better respond to the ever-changing needs of Customers, in full alignment with the applicable legislative and regulatory requirements. In 2020, despite the worldwide pandemic crisis due to Covid-19, Alpha Bank managed to successfully pass all surveillance or recertification audits for its existing ISO certifications and additionally it expanded the scope of ISO27001 and ISO20000 Systems.

Sustainability Approach

With a view to ensuring its sustainable development, Alpha Bank is committed to operating responsibly, taking into account the economic, social and environmental parameters of its operation, both in Greece and in the other countries where it is present. To this end, it has developed a "Corporate Responsibility Policy", which has been approved by the Bank.

In 2019, Alpha Bank performed a new process for the identification and mapping of the most material issues for its responsible operation (materiality analysis). Stakeholders and Senior Management Executives were involved in the process, in accordance with best practices (i.e. the GRI Standards).

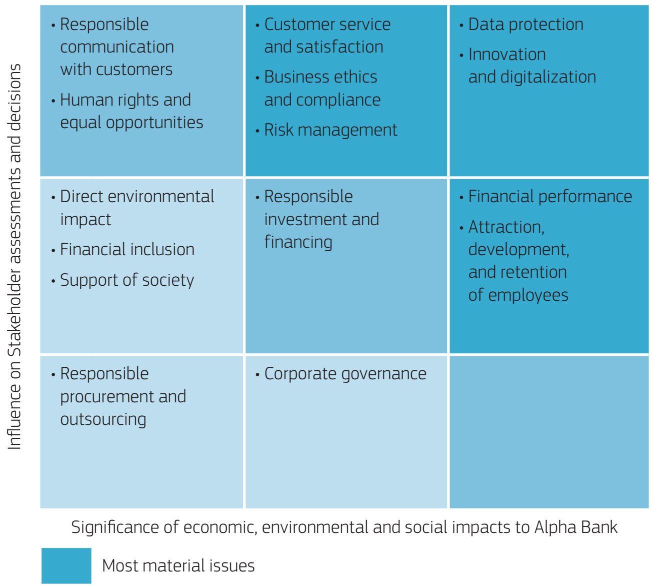
The Bank has adopted a risk management approach for the analysis of priorities by the Senior Management. The methodology followed was in line with the existing risk management methodologies and tools used by Alpha Bank.

The Bank has recognized as its Stakeholders the natural and/or legal persons who/which, either directly or indirectly, are connected to, and affect or are affected by, the Bank's decisions and its operation. Following a series of internal meetings and based on the relevant laws and international guidelines, its daily operations, the existing policies and procedures and the Group's sustainability strategy, Alpha Bank has identified four different Stakeholder groups (i.e. Analysts and Investors, Customers, Employees and Society).

In late 2019 and early 2020, 5,180 representatives from all Stakeholder groups participated in the materiality analysis process, via an online electronic questionnaire.

The issues evaluated and the assessment results are presented in Alpha Bank's materiality matrix.

Alpha Bank materiality matrix



Based on the analysis, there are seven issues that have been recognized as most material both from the Bank's Senior Management and its Stakeholders. Alpha Bank assessed impacts through a risk based approach. The issues which emerge as most significant have been recognized as having higher potential impact, while the risk mitigating practices / internal controls in place have reduced the probability of risk occurrence to acceptable levels.

In 2020 the Members of the Audit and Risk Management Committees were invited to participate in a session discussing and assessing the issues identified by Alpha Bank. The outcomes of this session have been used by Alpha Bank to identify areas of further improvement.

It should be stressed that the non-financial matters identified in Law 4548/2018 and GEMI Circular 62784/2017 are a subset of the issues assessed by Alpha Bank and its stakeholders. A mapping is presented in the following table.

Matters according to Law 4548/2018 and GEMI Circular 62784/2017	**Sustainability Issues** as in Alpha Bank's materiality analysis matri	**Main Risk Categories** as identified by Alpha Bank Senior Management	**Key Performance Indicators**	**Reference**
Environment	Responsible investment and financing Direct environmental impact Risk management Responsible procurement and outsourcing	Reputation & Quality of Services Environment Financial	New financing arrangements for renewable energy projects throughout the year (total amount in Euro) Percentage of debit and credit cards for which an electronic monthly bill is sent (e-statements) as of 31 December (%) Amount of paper recycled throughout the year (total amount in tons)	Section Environment - Performance in 2019 and 2020 of this Non Financial Report
Social and employee matters	Responsible investment and financing Innovation and Digitalization Financial inclusion Employee attraction, development and retention Human rights and equal opportunities Support of society Risk management Responsible procurement and outsourcing	Reputation & Quality of Services Environment Society Human Resources Financial	Employees as of 31 December (number of employees) Employees with disabilities as of 31 December (number of Employees) Women Employees as of 31 December (%) Recruitment of women Employees throughout the year (%) Percentage of women in managerial positions as of 31 December (%) Percentage of Employees covered by Collective Labor Agreements as of 31 December (%) Employee training (hours of training throughout the year per Employee) Number of fatalities throughout the year (number of Employees) Number of injuries throughout the year (number of Employees) Percentage of branches accessible (ramp or easily accessible) by people with disabilities (PwD) as of 31 December (%) Percentage of monetary transactions made through digital networks throughout the year (%)	Section Social and employee matters - Performance in 2019 and 2020 of this Non Financial Report
Respect of human rights	Human rights and equal opportunities Responsible procurement and outsourcing	Reputation & Quality of Services Human Resources	Convictions against the Senior Management for any incidents of human rights violations throughout the year (number of incidents) Percentage of Employees covered by Collective Labor Agreements as of 31 December (%)	Section Human rights - Performance in 2019 and 2020 of this Non Financial Report
Anti-corruption and bribery	Business ethics and compliance Responsible procurement and outsourcing	Reputation & Quality of Services Financial Legal & Compliance	Convictions against the Senior Management for any corruption offences throughout the year (number of incidents) Employees attended compliance specific training programs throughout the year	Section Anti-corruption and bribery - Performance in 2019 and 2020 of this Non Financial Report
Supply chain	Responsible procurement and outsourcing	Reputation & Quality of Services	Cooperation with local suppliers	Section Supply chain

In the following pages the primary potential risks for the five areas (environment, social and employee matters, human rights, anti-corruption and bribery and supply chain) specified by the Greek Law 4548/2018 and the General Electronic Commercial Registry's Circular 62784/2017 are presented along with an outline of Alpha Bank's management approach.

ENVIRONMENT

Potential Risks

Alpha Bank's identified environmental risks include:

- Inability to integrate environmental criteria into the design of new products and services (e.g. products with positive environmental impacts), offer of environmentally responsible investments, participate in the financing of projects with positive effects on the environment.
- Failure to assess environmental risks in customer and project finance, including inadequate monitoring of risk management during the implementation of the financed projects. Refraining to address risks presented by climate change to businesses, such as the impact of more extreme weather events. Increased costs from additional due diligence required, when applying minimum ESG standards.
- Failure to meet new requirements (e.g. TCFD, MiFID II, guidelines on non-financial reporting, EBA guidelines on green lending, UNEP FI Principles for Responsible Banking, UN PRI Principles for Responsible Investment etc.).
- Inability to offer environmentally responsible investments. Miss the opportunity to offer new investment opportunities with better performance.
- Increased risk of damage to the Bank's infrastructure due to increased frequency and intensity of extreme weather events.
- Increased energy use (e.g. from bank branches, buildings and data centers and consumption during transport and distribution of mail, information material, employee transportation etc.).
- Increased environmental footprint (e.g. paper consumption, water consumption, insufficient management of hazardous waste, failure to adopt circular economy principles).

Alpha Bank's Management

Raising awareness on environmental issues and protecting the environment are key priorities for the Bank. Alpha Bank manages the environmental dimension of financing through its responsible financing approach, as explained in the "Responsible Investments and Financing" section of this Report.

The assessment of climate change risks is a key priority for Alpha Bank. Following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the Bank assesses the impeding environmental policies, the legal requirements and the guidelines associated with the climate, in order to record and efficiently manage any transitional risks. Indicatively, in 2020, Alpha Bank reviewed the draft European Central Bank Guidelines on climate-related and environmental risks and a dedicated project has been initiated.

Alpha Bank has insured its infrastructure and buildings, including offices, branches and warehouses in order to mitigate the physical risks associated with the effects of extreme weather events. In addition, such incidents are addressed within the Bank's Business Continuity Management System to ensure the uninterrupted provision of services to Customers and other Stakeholders.

Alpha Bank monitors its environmental impacts related to its operation and aims to reduce its environmental footprint by promoting the rational use of lighting, heating and cooling installations in its buildings, the use of environment-friendly class A++ or higher energy efficiency equipment as well as distance training, by implementing initiatives for the efficient use of raw and other materials and by applying the "reduce, reuse, recycle" principles of circular economy in the waste management. Indicatively, the Bank recycles paper, batteries, light bulbs, printer consumables, electric and electronic equipment, and donates old office equipment. The Bank's Environmental Policy and procedures according to the requirement of ISO 14001 improve the management of these issues. Through these procedures, the Bank identifies and assesses known and potential environmental risks and opportunities in a more formal and detailed manner. Furthermore, the Bank organizes, supports and participates in environmental actions to cultivate the ecological conscience of its Employees and their families and to improve the quality of the environment.

Performance in 2019 and 2020

Indicators	Alpha Bank S.A.		Alpha Bank Group	
Year	2019	2020	2019	2020
New financing arrangements for renewable energy projects [2] throughout the year (total amount in Euro) [1]	-	€179,367,000	-	€179,367,000
Percentage of debit and credit cards for which an electronic monthly bill is sent (e-statements) as of 31 December (%) [1]	88%	90%	80%	82%
Amount of paper recycled [3] throughout the year (total amount in tons)	52	485	84	494

1 This KPI is applicable only to the Bank and AB Romania, AB Cyprus, AB Albania and AB London.

2 This KPI includes only corporate loans monitored by the following Divisions: Structured Finance Division, Corporate Banking Division and Business Centres Division. In addition, the amount of loans for renewable energy projects represents the amounts of loans approved during the year and not necessarily the amounts disbursed. This is the first time that this KPI is included within Non-Financial Report of 2020.

3 Amount of paper recycled (total amount in tons) as verified by the logistic partner. Recycled paper includes cut and uncut - mashed paper bank documents. Recycling definition has been updated this year since it includes the uncut-mashed paper bank documents, while in 2019, as it is included above, only cut paper bank was included within.

SOCIAL AND EMPLOYEE MATTERS

Potential Risks

Alpha Bank's identified social and employee risks include:

- Insufficient human resources management (e.g. resulting in high Employee turnover, insufficient incentives for new Employees, unsatisfied and insecure Employees / trade unions, Employees without a common vision / culture, limited cooperation between Employees etc.).
- Implementation of unfair labor practices (e.g. resulting in incidents of racial, religious and political racism in the workplace, unequal treatment of men and women, lack of job opportunities for people with disabilities, inefficient complaint handling mechanisms for labor practices etc.).
- Insufficient health and safety management at the workplace (e.g. resulting in injuries of Employees / contractors at work, lost days of work, breaches of regulations governing workplace health and safety, lack of Emergency Plans in the Bank's buildings and branches etc.).
- Unable to serve Customers through digital networks. Physical presence in Branches is required. Failure to foster financial inclusion.
- Failure to manage impacts on society and local communities (e.g. failure to support local economy, reduce awareness of local communities' needs and dynamics, failure to monitor and reporting Bank's indirect impacts to society etc.).
- Unable to provide social contribution, promote and support Employee efforts to improve environmental and social practices.
- Inability to integrate social criteria into the design of new products and services, to offer socially responsible investments, to participate in the financing of projects with positive impacts on society.
- Failure to assess social risks in customer and project finance.

Alpha Bank's Management

Alpha Bank's Employees constitute its most valuable asset and its cornerstone, since the Bank's growth and the achievement of its goals largely depend on their competence. Flexible, committed, united and with a strong sense of responsibility, they successfully adapt to the ever-changing circumstances. Alpha Bank implements fair labor practices and policies with regards to its Employees, following well established international guidelines. It ensures top-quality work conditions and opportunities for advancement that are based on merit and equitable treatment, offers fair remuneration, reward schemes and provides Employees with continuous education and training.

As stated in its Corporate Responsibility Policy, Alpha Bank respects and defends the diversity of its Employees and treats all Employees with respect. The Bank promotes a culture that fosters diversity and inclusion for its workforce and implements appropriate metrics to monitor diversity at all levels. All regular Bank Employees are covered by the Sector Collective Bargaining Agreements and the National General Collective Agreement at Bank level and about 88% are members of trade unions. In 2020, a pulse survey was administrated to address employees concerns regarding Covid-19 in a timely manner. Additionally, since the last quarter of 2020, employee satisfaction pulse surveys will be conducted on a quarterly basis in order to collect and monitor employee feedback and address concerns in a timely and effective manner.

Alpha Bank has also established a weekly "Communication Day". On this day, any Employee who wishes to do so, can meet the Manager of the Human Resources Division to discuss any work-related or personal matter, while similar meetings are also held all over Greece between Officers of the Human Resources Division and Employees. However, due to Covid-19, these meetings could not take place. Trying to establish a new, modern and direct communication with the employees, the Human Resources Division launched during the last months of 2020 the #stayconnected program. This program includes initiatives regarding the training or coaching of employees in order to face the Covid period and enhance the collaboration among teams. Other actions within the context of this initiative include:

- Training of all employees in different tools of communication.
- Training of Managers in monitoring effectively the new virtual collaboration.
- Coaching of employees in order to face isolation or psychological issues, especially during the Covid period.

Employees may report through the Bank's whistleblowing mechanism any irregularities, omissions or offences that came to their attention, such as serious violation of policies and procedures, acts that arguably offend the code of ethical practice of the Bank and the Group Companies, acts that endanger the safety of an Employee etc. Disputes of a labor relations nature are addressed in accordance with the provisions of the Personnel Regulation of the Bank.

The Bank's training ensures that the training needs of the Personnel are covered, thus preventing any gaps or weaknesses in connection with the human resources employed. Training needs arise in connection with specific knowledge areas, areas of experience or even personal skills, manifesting themselves as behavior in the workplace.

Health and safety at the workplace are significant for the Bank and its Human Resources, as any illnesses, injuries or other health issues may affect the work environment and the Employees' efficiency. The Bank complies with the laws in force and ensures the provision of additional benefits and programs such as training programs related to robbery incidents, hostage-taking, fire safety, earthquake and building evacuation etc. The development of a comprehensive and effective Business Continuity Management Framework by Alpha Bank ensures, to the maximum extent possible, the protection of the health and safety of Employees, the uninterrupted provision of services to Customers and other Stakeholders (Shareholders, business partners, suppliers, Regulatory and State Authorities etc.) and the minimization of the consequences (in terms of operation, finances, legal issues and reputation) in case of an unforeseen event which can affect its operation. Alpha Bank is in the process of reviewing its procedures for the development of an Occupational Health and Safety Management System in accordance with ISO 45001:2018. In addition, there is a permanent presence of Occupational Physicians within work premises with large number of Personnel, while the Bank engages with experts (i.e. psychologists) and offers Employees the opportunity for consultation and support services.

Having identified the opportunities and challenges of the new digital era from an early stage, Alpha Bank has established the Digital Transformation and Innovation Division to coordinate and implement actions and activities that promote the Bank's digital transformation. The Bank is actively fostering financial inclusion through an extensive network of Branches and off-site ATMs across Greece. Indicatively, the Bank operates 13 Branches and 42 ATMs in sparsely populated areas in Greece with fewer than 2,000 inhabitants.

Alpha Bank continues to invest in activities and initiatives that support education, culture, healthcare and the environment and promotes the concept of voluntarism by raising the awareness of Employees and by increasing the number of the relevant programs and initiatives. To ensure the transparency of its social investments, the Bank applies an internal evaluation system, according to which all proposals are assessed using objective performance evaluation criteria (economic, social and environmental) and are approved or rejected depending on the evaluation result.

Finally, the Bank manages the social dimension of financing through its responsible and financing approach, as explained in the "Responsible Investments and Financing" section of this Report.

Performance in 2019 and 2020

Indicators	Alpha Bank S.A.		Alpha Bank Group	
Year	2019	2020	2019	2020
Employees as of 31 December (number of Employees)	6,969	6,323	10,530	10,528
Employees with disabilities [1] as of 31 December (number of Employees)	122	108	136	120
Women Employees as of 31 December (%)	55%	55%	60%	60%
Recruitment of women Employees throughout the year (%)	40%	50%	66%	62%
Percentage of women in managerial positions [2] as of 31 December (%)	37%	37%	42%	43%
Percentage of Employees covered by Collective Labor Agreements as of 31 December (%)	100%	100%	76%	68%
Employee Training (hours of training throughout the year per Employee)	19	9	23	13
Number of fatalities [3] throughout the year (number of Employees)	-	-	-	-
Number of injuries [3] throughout the year (number of Employees)	1	1	4	1
Percentage of branches accessible (ramp or easily accessible) by people with disabilities (PwD) as of 31 December (%) [5]	60%	65%	71%	74%
Percentage of monetary transactions made through digital networks [4] throughout the year (%) [5]	88%	92%	85%	90%

* Any KPIs related to Employees apply to all the regular Employees.

1 This KPI relates to all employees with any degree of disability.

2 Managerial positions include Branch Managers, Managers and Assistant Managers of Head Office Divisions and Members of the Senior Management (General Managers, Executive General Managers, CEO).

3 Excludes incidents caused by pathological causes and relates to incidents during working hours.

4 Alpha Bank's digital networks: ATMs, APSs, myAlpha Web, myAlpha Phone, myAlpha Mobile. Digital Networks definition has been updated this year in order: 1) To be comparable to the Branches' transaction. 2) To be harmonized with other reports inside and outside the Bank (e.g. in the Hellenic Banks Association). 3) The new myAlpha Wallet is not included in the year 2020, as for the year 2020 the transactions of MyAlpha Wallet, concern exclusively Tap 'n Pay transactions, which means that it functions as a contactless card. During the fiscal year 2019, the transactions of MyAlpha Wallet that were included in the specific index (and are also included in the 2019 index in the above table) concerned payments of bills by card. The corresponding transactions for the year 2020 are made through the myAlpha Web. 4) Payroll and Suppliers' transactions made through Alpha Mass Payments and Alpha File Transfer, which were included last year (and are included above in 2019) are automated and are not executed by customers.

5 These KPIs are applicable only to the Bank and AB Romania, AB Cyprus, AB Albania and AB London.

HUMAN RIGHTS

Potential Risks

Alpha Bank's identified human rights risks include:

- Violations of human rights (e.g. freedom of association, collective bargaining, forced or compulsory labor, child labor etc.).
- Inefficient complaint handling mechanisms for human rights issues.
- Incidents of discrimination against Customers.

Alpha Bank's Management

Alpha Bank respects and promotes human rights through the business policies it applies, its responsible supply chain and the relations it develops with its Customers. The Bank's Corporate Responsibility Policy and its Code of Ethics describe its approach and commitment to the management of human rights. At the same time, it applies the law and follows internationally acclaimed directives, principles and initiatives to protect human rights, such as the Core Labour Conventions of the International Labour Organization (ILO) and the Universal Declaration of Human Rights (UDHR).

The Bank recognizes the right to union membership and collective bargaining (see section "Social and employee matters – Alpha Bank's Management of this Report) and opposes all forms of child, forced or compulsory labor.

Human rights issues are addressed through the weekly "Communication Day" and the monthly meetings with the Employee Relations Officers, as explained above. Similarly, employees, customers and suppliers may report any concerns through the Bank's whistleblowing.

The Group grants priority to the satisfaction of their individual and business needs by providing quality services for all its Customers without any discriminations, protecting the Customers' legitimate interests and human rights.

Performance in 2019 and 2020

Indicators	Alpha Bank S.A.		Alpha Bank Group	
Year	2019	2020	2019	2020
Convictions against the Senior Management[1] for any incidents of human rights violations throughout the year (numbers of incidents)	-	-	-	-

[1] As Senior Management are defined the members of the Board of Directors and the General Managers.

ANTI-CORRUPTION AND BRIBERY

Potential Risks

Alpha Bank's identified anti-corruption and bribery risks include:

- Corruption / bribery / fraud incidents within the Bank or involving other entities (e.g. suppliers, customers, distributors etc.) that are doing business with the Bank.
- Legal actions / fines against the Bank.
- Lack of or ineffective operation of anonymous reporting mechanisms (whistleblowing).
- Lack of or ineffective operation of grievance mechanisms regarding incidents of bribery, corruption and fraud etc.

Alpha Bank's Management

In line with its firm and unwavering position against corruption, bribery and fraud, Alpha Bank has issued an Anti Bribery and Corruption Policy and established relevant control mechanisms in order to mitigate the relevant risks. Those issues were included in the Compliance Awareness Training Program that continued in 2020, in Alpha Bank Group Employees. The Bank conducts internal audits for compliance with the regulatory framework and has put in place specialized control and reporting systems and works closely with the competent Regulatory Authorities to compact money laundering and financial crime.

Training programs on anti-money laundering and anti-corruption policies and procedures are carried out by Bank Employees on an annual basis, in order to raise awareness regarding compliance with newly applied and upcoming policies. During 2020, Compliance Division launched an AML enhancement program, aiming to strengthen the effectiveness of the relevant procedures and the control mechanisms.

Additionally, the Bank has established the position of Anti-Money Laundering (AML) Officer in each one of its Branches. These Branch AML Officers are provided with adequate training on AML and anti-corruption policies and procedures as well as with daily telephone support to ensure that they are able to identify and handle such incidents.

Employees, Customers and suppliers who become aware of serious irregularities, omissions or offences, may report them in accordance with the Bank's Whistleblowing Policy and Procedures. During 2020, eight (8) reports were submitted via the whistleblowing channels. Following the examination of the relevant Committee, there were no major findings.

Performance in 2019 and 2020

Indicators	Alpha Bank S.A.		Alpha Bank Group	
Year	2019	2020	2019	2020
Convictions against the Senior Management [1] for any corruption offences throughout the year (numbers of incidents)	-	-	-	-
Employees attended compliance specific training programs throughout the year (number of employees) [2]	-	300	-	3,098

[1] As Senior Management are defined the members of the Board of Directors and the General Managers.

[2] It applies to all regular Employees. This is the first time that this KPI is included within Non-Financial Report of 2020.

SUPPLY CHAIN

Potential Risks

Alpha Bank's identified supply chain risks include:

- Doing business with suppliers failing to address business ethics (e.g., corruption and bribery issues), fair labor practices, human rights as well as having negative impacts on society and/or the environment.
- Not supporting the local economy.
- Outsourcing agreements with companies that do not comply with regulations, Alpha Bank's values and business principles or the current market practices (e.g. business continuity plans etc.).

Alpha Bank's Management

Alpha Bank keeps a register of suppliers that cooperates. Collaboration with these suppliers involves the supply of products or services (consumables and printed material, electrical and electronic IT equipment, cleaning services, dining services, general maintenance services, IT support services, technical projects and works contracts). Almost all types of suppliers are covered (contractors, consultants, distributors, logistics support partners, sales representatives, manufacturers).

The Bank has identified the Corporate Social Responsibility principles that should be applied by the Bank, its suppliers and partners in its Corporate Responsibility Policy. All suppliers are expected to comply with this Policy and operate responsibly. When evaluating suppliers' performance, the Bank assesses whether they have had their management systems certified according to international standards such as ISO 9001, OHSAS 18001 and ISO 14001.

The Bank has also established an Outsourcing Policy, which sets specific criteria for third party service providers aiming to minimize potential risks for the Bank and its Customers. According to the Policy, every third party and service provider is periodically evaluated by Alpha Bank's Outsourcing Functional Area, in collaboration with different Divisions of the Bank. The initial or/and periodic assessment of suppliers of Outsourcing services (critical - noncritical) is carried out with specifically designed questionnaires containing many questions and information. Through these questionnaires, based on their competencies and scope, the specific jointly-competent Divisions assess any risks for the quality of services, counterparty risk (financial status, long-term sustainability), information security risk, confidentiality risk, personal data management risk, business continuity risk, regulatory/legal and tax compliance risk. Furthermore, the cooperation and service agreement contracts contain contractual terms for compliance with labor and insurance legalization and for taking the necessary measures to ensure the health and safety of Employees.

Finally, Alpha Bank seeks to support local communities and create added value for the local economies. In 2020, Alpha Bank Group cooperated primarily with local suppliers, whenever possible.

RESPONSIBLE INVESTMENTS AND FINANCING

Alpha Bank actively participates in the global effort to build a sustainable future for the economy and the planet. In 2019, the Bank signed the six Principles for Responsible Banking, which were developed as an international initiative of the United Nations – Environment Programme Finance Initiative (UNEP FI). A year earlier, in 2018, and Alpha Asset Management M.F.M.C. became a signatory of the Principles for Responsible Investment (PRI) Initiative.

For the purpose of implementing the Principles, in 2020, Alpha Bank conducted an Impact analysis of its portfolio and submitted its first self-assessment report to the UNEP FI. The Bank identified positive and negative associations between its portfolio and the 23 environmental, economic and social areas defined by the UNEP FI Principles for Responsible Banking (PRB). For this initial assessment, the analysis was focused on the Bank's operations in Greece, across its Retail, Small and Medium Businesses, Wholesale, and Investment activities.

The most significant impact areas were prioritized based on Alpha Bank's exposure in different sectors through its portfolio and on the priorities and challenges identified at the national level in Greece. To better capture Alpha Bank's actual impacts, members of the Senior Management as well as representatives of key business lines were involved in the process. The four (4) most significant impact areas identified were namely Water, Employment, Waste and Climate. For these four areas, Alpha Bank is currently in the process of defining a set of specific medium and long-term targets that will increase its positive impacts, while minimizing negative impacts.

Furthermore, the Bank is exploring opportunities to further enhance its governance structure and oversight of sustainability issues, which will better facilitate the monitoring and implementation of the Principles and the targets.

Alpha Bank seeks to increase its positive effect on society and the environment, utilising new business opportunities and generating value for all stakeholders. The Bank offers thematic investments with a positive direct or indirect impact on humanity and the environment (Socially Responsible Investing - SRI) as well as on mutual fund choices that also take into account social responsibility and corporate governance with regards to the underlying assets under management (Environmental, Social and Governance - ESG criteria). Aiming to raise awareness regarding ESG and sustainable investments, Alpha Bank organizes informative events and on a regular basis publishes relevant informative material in reports. It supports households and business responsible investment choices and invests in large infrastructure projects and projects that have a positive environmental and social impact. On this basis, Alpha Bank regularly coordinates internal and external (Customer) events focused on the merits of ESG investing.

The Bank's Project Finance Unit works on securing financing for investments in projects aiming at benefiting society. In 2020, the Project Finance Unit continued its successful activity, providing financing for new investments in wind farms and solar parks, while it also undertook or participated in new financing arrangements.

Since 2016, the Group has incorporated the "Environmental and Social Risk Management Policy on Legal Entities Lending" in the Group's existing Credit Risk Management Framework and the Group's Credit Policy, thereby enhancing the effective management of the environmental and social dimension of financing. The Policy presents the responsibilities and the approach followed in managing environmental and social risk at every stage of the lending process and also provides an industry-specific Exclusion List (i.e. a list of sectors that the Group does not finance), as well as a list of crucial industry sectors/activities associated with environmental and social risk. All obligors-legal entities are evaluated, assessed and reviewed against the possible environmental or social risks in each stage of the Group's corporate credit procedure. When specific criteria are met, an environmental and social due diligence, i.e. on-site visit at customer's premises, is conducted by environmental and social specialists in order to assess customer's compliance with the respective legislation. Similarly, in order to assess the investments, the Project Finance team collaborates with specialized technical advisors on the projects' environmental licensing and environmental due diligence. Following the disbursement of credit, adherence to environmental terms and commitments is obligatory, throughout the long duration of the said financings.

In 2020, there were no cases of non-approval of credits due to issues which occurred during the assessment of environmental and social risks.

Alpha Asset Management

Alpha Asset Management M.F.M.C. is committed to the implementation of the six Principles of the UN-supported international Principles for Responsible Investment (PRI) Initiative. Alpha Asset Management's framework for responsible investments aims to better allocate capital by considering material environmental and social issues, as well as governance factors in the investment process.

In 2020, the company developed a new comprehensive Environmental, Social and Governance (ESG) policy to drive the application of ESG criteria to its mutual funds. The ESG Policy represents the guiding principles to ensure that information on ESG risks and opportunities is appropriately incorporated into the investment process. ESG factors are considered alongside traditional financial analysis and active ownership to provide a comprehensive and holistic view of investments, better manage risks and help identify those investments that have the potential to deliver sustainable returns. The methodology for responsible investment is developed to cover equity, fixed income and multi-asset portfolios and includes ESG due diligence in fund of funds' portfolios. The responsible investment approach combines an optimal blend of ESG strategies, adapted for each fund according to the specific characteristics of its asset class, investment process and geographical area. The company launched a thematic fund of funds targeting opportunities in climate change, innovative technologies, evolving consumer trends, demographic changes and sustainability strategies. The company is in the process of transforming the Alpha (LUX) Global Fund of Funds into an ESG offering in order to meet client demand and adapt to regulatory requirements.

Alpha Asset Management has been awarded the score of "A" (in an evaluation scale of E – A+) for its approach to responsible investing. The score was awarded by the PRI in its 2020 assessment report and demonstrates the level of Alpha Asset Management's expertise in terms of integration of ESG criteria across its investment processes.

Alpha Asset Management approach to responsible investment reflects the best interest of its stakeholders in delivering enhanced risk-adjusted returns over the long term and contributing to a sustainable world.

ESG PERFORMANCE RATINGS

Alpha Bank is subject to assessments by international analysts and rating agencies and as shown in the following table, it is constantly improving its ESG performance.

ESG Ratings	**Alpha Bank's Performance**				
Year	**2016**	**2017**	**2018**	**2019**	**2020**
MSCI ESG Rating (scale CCC-AAA)	B	BB	BBB	A	AA
FTSE4Good Emerging Index	✓	✓	✓	✓	✓
ISS ESG Quality Score (score 1-10, 1 indicates lower risk and better disclosure)			E: 2 S: 2 G: 8 November 2018	E: 1 S: 2 G: 9 October 2019	E 1 S: 2 G: 4 December 2020
Vigeo Eiris Best Emerging Market Performers				✓	✓
Climate Change CDP		C	B	C	C
Bloomberg Gender Equality Index			✓ (Index 2019)	✓ (Index 2020)	✓ (Index 2021)

Explanatory Report of the Board of Directors of Alpha Bank for the Year 2020

The present Explanatory Report of the Board of Directors of Alpha Bank (hereinafter the "Bank") to the Ordinary General Meeting of Shareholders of the Bank for the Year 2020 contains detailed information, pursuant to the provision of article 4 par. 7 of Law 3556/2007, the reference date being 31.12.2020, in accordance with the order in which they are written in the provision in question.

In particular:

a. On 1.1.2020 the share capital of the Bank stood at the total amount of Euro 463,109,814.30 divided into 1,543,699,381 common, nominal, paperless shares with voting rights, of a nominal value of Euro 0.30 each. Out of the said common, nominal, paperless shares with voting rights, 1,374,525,214 have been subscribed by Private Investors and 169,174,167 have been issued by the Bank and have been subscribed by the Hellenic Financial Stability Fund, pursuant to Law 3864/2010, governed by virtue of the terms thereof.

   It is noted that until the end of the Year 2020 (31.12.2020) no change occurred in the share capital of the Bank.

   All shares are listed for trading on the Securities Market of the Athens Exchange.

   The 1,374,525,214 shares that have been subscribed by Private Investors represent 89% of the total paid-in share capital of the Bank and embody all the rights and obligations provided for in the law and the Bank's Articles of Incorporation.

   The 169,174,167 shares held by the Hellenic Financial Stability Fund represent 11% of the total paid-in share capital of the Bank; they have the rights stipulated by law and are subject to the restrictions of the law. With regard to these shares, it is noted that the Hellenic Financial Stability Fund:

   - became a Shareholder of the Bank within 2013, in the context of the recapitalization of Greek credit institutions, on the basis of Law 3864/2010, having, however, restricted voting rights at the General Meeting;
   - may vote at the General Meeting only on resolutions pertaining to the amendment of the Articles of Incorporation, including the increase or reduction of the share capital or the grant of a relevant authorization to the Board of Directors, the merger, split-up, conversion, revival, extension of the term of operation or winding-up of the Bank, the transfer of assets, including the sale of Group Companies or on any other item for which an enhanced majority is required in accordance with the stipulations of the law as in force;
   - also possesses all the other rights stipulated by Law 3864/2010, as each time in force.

b. The Articles of Incorporation contain no restrictions on the transfer of Bank shares, save as otherwise provided for in the law.

c. According to the Bank's records, on 31.12.2020, "EOC EQUITY LIMITED" held common shares representing 11.014 % of the total paid-in share capital of the Bank and the Hellenic Financial Stability Fund held common shares representing 11% of the total paid-in share capital of the Bank.

d. There are no shares issued by the Bank possessing special rights of control, with the exception of the common shares held by the Hellenic Financial Stability Fund in reference to the rights that the Hellenic Financial Stability Fund enjoys by virtue of Law 3864/2010.

e. The Articles of Incorporation contain no restrictions on voting rights and on the deadlines for exercising the same on shares issued by the Bank, save the restrictions foreseen in Law 3864/2010 with regard to the shares held by the Hellenic Financial Stability Fund.

f. To the knowledge of the Bank, there are no shareholder agreements providing for restrictions on share transfers or restrictions on the exercise of voting rights on shares issued by the Bank, save as otherwise provided for in the provisions of the laws stipulating the rights of the Hellenic Financial Stability Fund.

g. There are no rules in the Articles of Incorporation for the appointment and replacement of Members of the Board of Directors as well as for the amendment of the Articles of Incorporation of the Bank, which are at variance with the stipulations of the law as in force.

h. The Bank may increase its share capital by virtue of a resolution of the General Meeting of Shareholders or of the Board of Directors, in accordance with the law and the Articles of Incorporation.

   Additionally, for as long as the Hellenic Financial Stability Fund participates in the share capital of the Bank, the latter may not purchase its own shares without the former's approval.

   The Bank does not hold any of its own shares.

i. The Bank has entered into no major agreement, which comes into effect, is amended or expires upon a change of control of the Bank following a public tender offer.

j. The Bank has entered into no agreement with Members of the Board of Directors or its Personnel, providing for compensation upon their resignation or dismissal without just cause or upon termination of tenure or employment owing to a public tender offer, except in accordance with the provisions of the law.

Athens, 23 March 2021

THE CHAIRMAN OF THE BOARD OF DIRECTORS	THE CHIEF EXECUTIVE OFFICER
VASILEIOS T. RAPANOS ID No AI 666242	VASSILIOS E. PSALTIS ID No AI 666591

Corporate Governance Statement for the year 2020

A. GENERAL PROVISIONS

Pursuant to the provision of article 152 par. 1 of Law 4548/2018, the Annual Management Report of the Board of Directors of Alpha Bank (hereinafter the "Bank") includes the Corporate Governance Statement for the year 2020. The reference date of the Corporate Governance Statement is 31.12.2020.

Items c), d), f), h), i) of article 10 of Directive 2004/25/EC of the European Parliament and of the Council, as they are incorporated in items c), d), e), g), h) of article 4 par. 7 of Law 3556/2007, are analyzed in the Explanatory Report of the Board of Directors to the General Meeting of Shareholders, which is included in the Annual Management Report of the Board of Directors.

B. CORPORATE GOVERNANCE CODE AND PRACTICES

1. The Corporate Governance Code

The Bank operates within the framework of the Alpha Bank Corporate Governance Code, which is posted on its website (https://www.alpha.gr/en/group/corporate-governance).

Effective Corporate Governance constitutes an expressed goal of the Bank, which is constantly pursued. In particular, the Corporate Governance Code as well as the Corporate Governance practices which are implemented by the Bank are in accordance with the requirements of the relevant legislative, supervisory and regulatory framework, both of the European Union and of Greece and with the international best practices in Corporate Governance. They aim at increasing the long-term sustainability of the Bank, taking into consideration the interests of the Shareholders, those transacting with the Bank, the Employees and other Stakeholders. The Bank complies with the legislation requirements for corporate governance pertaining to listed companies, the special legislation of the Hellenic Financial Stability Fund (HFSF) and the provisions applied to credit institutions pursuant to European Union and Greek law as well as with the guidelines issued by the European Banking Authority (EBA), the European Securities and Markets Authority (ESMA) and the European Central Bank (ECB) on this thematic area.

The said practices are taken into account in the Bank's Corporate Governance Code, which sets the framework and guidelines for the governance of the Bank as well as in the policies and the procedures applied by the Bank pertaining to corporate governance issues, such as, indicatively, conflict of interests, related parties, remuneration, nomination of candidate Members of the Board of Directors and the operation of the Committees of the Board of Directors.

The Board of Directors, with the support of the Corporate Governance and Nominations Committee, is responsible for the revision of the Corporate Governance Code.

The Alpha Bank Corporate Governance Code defines the duties and allocates responsibilities among the Board of Directors, its Committees, the Executive Committee and the other Management Committees of the Bank, regulates issues pertaining to the composition, the operation and the evaluation of the Board of Directors, the obligations of its Members, issues pertaining to the General Meeting of Shareholders as well as issues pertaining to the Internal Control System of the Bank. The principles on which the Corporate Governance Code is based correspond to four concepts:

a. responsibility of the Bank's Management and Board of Directors;
b. accountability towards the Bank's Shareholders;
c. fairness towards all of the Bank's Stakeholders; and
d. transparency in the relationship between the Bank's Management and the Board of Directors as well as the Bank and its Shareholders and Regulators.

The Corporate Governance Code of the Bank stipulates expressly the different responsibilities of the Chair of the Board of Directors, the Vice Chair (if such a position has been filled) and the Chief Executive Officer (the "CEO"). The Bank complies with the Corporate Governance Code and provides explanations in case it deviates from the relevant provisions. The Bank fully complied with the Corporate Governance Code in 2020, as it did in the previous years.

The Bank is constantly enhancing its principles of Corporate Governance. In this context, the Bank adopted the following modifications, even prior to their establishment as regulatory and legal requirements: the separation of the Chair's duties from those of the CEO and the establishment of the Audit Committee of the Board of Directors.

The Bank constantly enhances the corporate governance framework it applies by adopting practices and measures beyond those defined in the relevant legislation, such as a larger number of Non-Executive Independent Members of the Board of Directors, adopting additional independence criteria to be fulfilled by the Non-Executive Independent Members than those provided for in the relevant national legislation and in line with EBA Guidelines, the establishment of monthly meetings of the Audit Committee of the Board of Directors and the Risk Management Committee of the Board of Directors as well as the establishment of joint meetings of the Audit Committee with the Risk Management Committee.

During 2020, it revised the Corporate Governance Code and policies pertaining to corporate governance, in order for them to be fully aligned with the current regulatory framework and with the most recent best practices of corporate governance, including more stringent criteria for determination of Non-Executive Independent Members.

2. Code of Ethics

Additionally, the Bank has adopted a Code of Ethics for the performance of duties with the purpose of implementing the standards required by modern corporate governance. The Code of Ethics is addressed to the Members of the Board of Directors of the Bank and of the Group Companies, the General Managers, the Senior Executives and Employees of the Group, Third Parties contractors transacting with the Alpha Bank Group and the Bank's and the Group Companies' Advisors.

All the activities of the Bank ultimately aim to its long term value creation for Shareholders and Stakeholders and are governed by principles enforced by ethics and laws such as:

- Integrity and honesty
- Objectivity and independence
- Discretion and confidentiality
- Disciplined and reasonable risk taking
- Transparency

Specifically, the Code describes the commitments and the practices of the Bank regarding its activities, the management, the rules of conduct of Executives and Employees towards each other, but also towards the Shareholders and those transacting with the Bank. The said Code, as in force, is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/code-of-ethics).

The Bank is a member of the "United Nations Initiative Environment Programme Finance" Initiative (UNEP FI), a UN initiative that promotes sustainable development with a strong focus on the protection of the environment, and is actively involved in the global effort to create a sustainable future for the economy and the planet, by endorsing (as Founding Signatory) the six Principles of Responsible Banking, which provide a comprehensive framework for responsible and sustainable banking, across the whole range of banking activities.

3. Corporate Governance at Group Level

During 2020, the Bank conducted a review of Corporate Governance Documents adopted by Subsidiaries. This analysis ensured that Subsidiaries' Corporate Governance Codes, the Charters of Board of Directors' Committees and Policies relevant to the Corporate Governance practices are fully aligned with the legal and the regulatory requirements, the EBA guidelines and best practices as well as with Alpha Bank's corporate governance principles, while taking into consideration the local regulatory framework.

Additionally, a series of meetings with Subsidiaries took place in order to discuss issues relevant to Corporate Governance.

4. Covid-19

The emergence of Covid-19 in Europe in the first quarter of 2020 has added a major uncertainty in terms of both macroeconomic developments and the ability of businesses to operate under the regime of the restrictive measures imposed. The financial implications depend to a large extent on how long this crisis will last and vary on a case-by-case basis as each sector of the economy is affected differently.

Alpha Bank's top priority throughout the outbreak has been to ensure the health and safety of Customers and Employees. To this end, from the onset of the Covid-19 outbreak, the Bank has taken a number of measures designed to prevent the spread of the virus, while still retaining its operational readiness.

Firstly, the most vulnerable Employees (including those who have to take care of minors) have been identified and allowed to either work remotely or stay at home under the special purpose leave from work. In addition, a robust communications plan containing guidelines as to how to protect against the virus was developed for Employees and

Customers, while business trips and non-essential travel have also been restricted.

Furthermore, the Bank has taken the necessary steps to secure an adequate supply of protective equipment and medical supplies (i.e. antiseptics, hand sanitizers and over-the-counter medicine) across the Group's offices and Branches. The office buildings and Branches are regularly cleaned and sanitized to mitigate the spread of the virus.

The Bank has also reinforced its digital infrastructure. The related action plan is being regularly reassessed in order to guarantee that the Bank's Branch Network remains active to ensure that the needs of Customers can continue to be met without interruption.

In addition, weekly calls were organized, regularly updating all Employees on the guidelines and policies and at the same time increased medical care was provided through an open line of communication with the Bank's physicians and direct online access to medical advice through myAXAdoctor.

Furthermore, the Bank actively supports Retail, Small Business and Commercial Customers in the current environment through flexible propositions including debt payment deferrals for both Individuals and Businesses, extension of revolving credit lines maturity, emergency working capital and the full support of Government Schemes, including the Government Guarantee Scheme and the new Entrepreneurship Fund II "Business Funding" scheme for SMEs.

Alpha Bank is closely monitoring the situation on Covid-19 and is continuously assessing the potential impact of the pandemic on the Bank's asset quality, risk profile and the execution of its Business Plan. In response to the Covid-19 outbreak and in light of the measures announced by the Greek Government, the Bank is reassessing its procedures so that a solid operational plan is in place to guarantee business continuity and operational readiness as well as to ensure the Bank will continue to strongly support the Greek Economy.

5. 2020 Highlights

Changes in the composition of the Board of Directors and in the Management

The Board of Directors, at its meeting held on 25.6.2020, elected as Members of the Board of Directors of the Bank Mr. Dimitris C. Tsitsiragos, in replacement of Mr. Demetrios P. Mantzounis, Non-Executive Member, who resigned on 31.12.2019 and Ms. Elanor R. Hardwick, in replacement of Mr. George C. Aronis, Executive Member, who resigned on 31.1.2020. The tenure of each elected Member has been set from 2.7.2020 until the expiration of the remainder of the tenure of the Member whom he/she replaces.

Mr. Dimitris C. Tsitsiragos and Ms. Elanor R. Hardwick, who fulfill the independence conditions and criteria according to the applicable legal and regulatory framework, have been appointed Non-Executive Independent Members of the Board of Directors of the Bank by the General Meeting of Shareholders held on 31.7.2020.

Additionally, at the Board of Directors meeting held on 26.11.2020, Mr. A.Ch. Theodoridis notified his resignation from the position of General Manager of Non-Performing Loans and Treasury Management with effect as of 1.12.2020, in order to assume, as of the same date, the position of Executive Chair of Cepal, while retaining his role as Member of the Board of Directors of the Bank. The said resignation took place in the context of the transfer of the Bank's Non-Performing Exposures servicing business to Cepal, which materialized on 1.12.2020.

In light of the new Strategic Plan and the governance structure approved by the Board of Directors in November 2019, Mr. S.N. Filaretos was appointed General Manager – Growth and Innovation as of 1.12.2020 and Mr. S.N. Mytilinaios was appointed General Manager – Chief Operating Officer as well as Member of the Executive Committee as of 1.12.2020.

New structure of the Management Committees

A new structure of the Management Committees of the Bank was introduced in order for the Bank to strengthen its organizational effectiveness and to facilitate executive decision-making, while maintaining strong risk management.

Further to the above, the Charters of the Management Committees were redrafted in order to reflect the new structure and responsibilities of the Committees.

The Management Committees are presented in detail in Chapter F. Management Committees.

Transfer of the Bank's NPE Management Activities to Cepal

The Bank, in the context of the implementation of its Strategic Plan, announced on 1.12.2020 the completion of the carve-out process of its NPE management activity to Cepal Hellas S.M.S.A. ("Cepal"), its 100% subsidiary Company providing management services for loan and credit receivables.

The transfer of the NPE Management Operations to Cepal is a key pillar of Project Galaxy, the Bank's large securitization transaction.

The transfer of the Employees of the Bank's NPE Management Operations to Cepal was implemented in accordance with the applicable law (Presidential Decree No 178) and in full respect of their salary and insurance rights as well as of the additional benefits they currently enjoy.

Demerger Deed by way of hive-down with the incorporation of a new company

The Bank informed the investors that, in the context of the implementation of its Strategic Plan announced on 19.11.2019, the Board of Directors, at its meeting held on 15.9.2020, approved the Draft Demerger Deed by way of hive-down with the incorporation of a new company, pursuant to article 16 of Law 2515/1997, par. 3 of article 54, par. 3 of article 57 and articles 59-74 (inclusive) and 140 of Law 4601/2019, as in force.

Update of Corporate Governance Documents

During 2020, the Bank updated the following documents:

- the Corporate Governance Code,
- the Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders,
- the Suitability and Nomination Process for the Members of the Board of Directors,
- the Diversity Policy,
- the Induction and Training Policy for the Members of the Board of Directors,
- the Senior Executives Severance Payment Policy,
- the Remuneration Policy for Alpha Bank and the other Group Companies,
- the Benefits and Corporate Expenses Policy for Alpha Bank and the other Group Companies, and
- the Expenses Policy for the Non-Executive Members of the Board of Directors.

Remuneration Report

The Bank drew up the Remuneration Report, as per the provisions of article 112 of Law 4548/2018, which reflects the full year 2019 implementation of the Remuneration Policy that was introduced as per the provisions of articles 110 and 111 of Law 4548/2018 (implementing the relevant provisions of the Shareholders Rights Directive II).

The Remuneration Report for the year 2019, in accordance with article 112 of Law 4548/2018, was submitted to the Annual Ordinary General Meeting of Shareholders held on 31.7.2020, which cast a positive vote on it.

The Report for the year 2019 will be available on the Bank's website for a time period of ten years, as stipulated by Law, through the following link: https://www.alpha.gr/en/group/corporate-governance.

6. 2021 Goals

The main Corporate Governance goals for 2021, include but are not limited to those presented below:

- Review of the Bank's Corporate Governance documents
- Further enhancement of gender diversification in the Board of Directors and Management
- Provision of further specialized training for the Members of the Board of Directors
- Assessment of the effectiveness of the Bank's approach to corporate governance
- Integration of Environmental, Social, and Corporate Governance (ESG) principles and of sustainable finance goals into the Corporate Governance Framework and implementation thereof into the operation of the Bank.

C. RISK MANAGEMENT AND INTERNAL CONTROL SYSTEMS

1. Risk Management

The Bank places great emphasis on the identification, measurement and monitoring of all types of risks. Under the leadership of the Group Chief Risk Officer (CRO), who is a General Manager, an Executive Committee Member and a rapporteur to the Risk Management Committee, the Risk Management Unit (RMU) has developed an adequate structure to facilitate the implementation of the Risk Management Framework across the Group. The RMU exercises effective, functional oversight of risk management across the Group legal entities.

Alpha Bank's Risk Management Framework is based on an extensive set of risk policies. The most important policy underpinning this framework is the Risk and Capital Strategy. This policy outlines the Risk Appetite Framework and creates linkages to strategy and the capital allocation processes.

The Bank has an array of executive-level risk management committees addressing the various key risk types.

The Credit Risk Committee (CRC) assesses the adequacy and efficiency of the credit risk management policy and procedures of the Bank and the Group and plans the required corrective actions.

The Assets-Liabilities Management Committee (ALCo) decides on matters regarding the management of Asset-Liability and cash management issues, i.e. liquidity, hedging strategy, capital structure, proposals for new products/services or modification of existing products/services, products pricing, portfolios etc., assesses financial risks and decides on the risk hedging strategy and actions.

The Operational Risk and Internal Control Committee, established in 2020, takes cognizance of and decides on issues related to Operational Risk and the Internal Control Framework.

The Troubled Assets Committee (TAC) formulates, evaluates and approves the Wholesale and the Retail Banking NPE management strategy.

The Bank has fully complied with the provisions of the institutional framework with respect to its troubled assets. The Risk Management Committee, a Committee of the Board of Directors as described below, provides oversight of all the areas of Risk Management of the Bank.

The Audit Committee and the Risk Management Committee, in a joint session, provide oversight of certain key areas of risk and capital management and their repercussions on the Internal Control System and review issues relevant to the remediation plans related to regulatory/supervisory assessments, operational risk and other issues of importance and common interest.

2. Internal Control System

The Internal Control System, on which the Bank places great emphasis, comprises all mechanisms and procedures relating to all the activities of the Bank and is designed to ensure:

- the consistent implementation of the business strategy with an effective utilization of the available resources,
- the identification and management of all risks undertaken to achieve business objectives,
- the completeness and the reliability of the data and information required for the accurate and timely determination of the financial situation of the Bank and the generation of reliable Financial Statements,
- the compliance with the current regulatory framework, the internal regulations, the rules of ethics,
- the prevention and avoidance of erroneous actions that could jeopardize the reputation and interests of the Bank, the Shareholders and those transacting with it,
- the effective operation of the IT systems in order to support the business strategy and the secure circulation, processing and storage of critical business information.

The Internal Control System is structured along the three lines of defense model: the business and operational or support units (first line); the risk management and compliance functions (second line) and the internal audit function (third line).

The Audit Committee is responsible for the monitoring of financial reporting processes, the effective operation of the internal control and risk management systems as well as for the supervision and monitoring of the performance and independence of the Statutory Certified Auditors. The specific duties and responsibilities of the Audit Committee are set out in its Charter, which is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/commitees).

The Audit Committee cooperates with the Risk Management Committee regarding the oversight of certain key areas of risk and capital management and their repercussions on the Internal Control System. In addition, in 2020 the Bank established the Operational Risk and Internal Control Committee, a Management Committee which, among other things, develops the Internal Control Framework on a continuous basis.

The evaluation of the adequacy and effectiveness of the Internal Control System of the Bank is conducted:

a. On a continuous basis through the review of audits conducted by the Internal Audit Division at a Group level, following a risk-based audit plan, and the activity performed by the Compliance Division.

   The audit plan of the Internal Audit Division is based on appropriate risk assessment techniques supplemented by any requests or decisions of the Audit Committee, along with regulatory framework requirements.

b. On an annual basis by the Audit Committee of the Board of Directors, on the basis of the relevant data and information received through the year from the Internal Audit Division, the Compliance Division, the Risk Management Unit and the Management as well as on the basis of the findings and observations from the External Auditors and the Regulatory Authorities.

   In 2020, the Audit Committee evaluated the Internal Control System of the Bank for 2019, in accordance with the Bank of Greece Governor's Act 2577/2006 as in force, and submitted to the Bank of Greece its assessment report on the adequacy and effectiveness of the Internal Control System of the Alpha Bank Group.

c. Every three years by external auditors, other than the statutory auditor: these are highly experienced individuals in the field of internal audit (external auditors or special advisors), who are independent of the Group.

   This supports the specific policies and procedures adopted by the Board of Directors in order to formulate a recommendation for the General Meeting of Shareholders with regard to the election of the statutory auditor, intended to ensure the independence and quality of the statutory auditor of the Financial Statements of the Group.

Furthermore, the Audit Committee monitors the activity and performance of the statutory auditor responsible for the audit of the annual consolidated Financial Statements, taking into account any findings and conclusions of the competent authority, in accordance with article 26 par. 6 of Regulation (EU) No 537/2014.

The Bank has in place policies and procedures for all business and operational areas, in line with the regulatory framework, as well as policies to enforce a fully ethical culture, including a Code of Ethics and a Whistleblowing Policy.

In order to minimize IT risks, the Bank has designed and implemented strong IT Security Controls for avoiding unauthorized access, for omissions of errors during access management and for compliance with regulatory requirements and standards.

With regard to the financial reporting and accounting processes in particular, the Bank has in place policies and procedures established in accordance with the current legislation and the accounting standards in force, as defined in the International Financial Reporting Standards (IFRS), that have been adopted by the European Union, pursuant to Regulation (EC) No 1606/2002 of the European Parliament and of the Council of 19 July 2002. One of the prime procedures of the Bank in order to ensure control effectiveness and prevent errors and fraud is the segregation of duties and the four-eye principle, based on shared responsibilities for key processes to more than one persons or Divisions and approval of certain activities by at least two people.

The accounting system of the Bank and the Group is supported by appropriate IT systems which have been adapted to the business requirements of the Bank and the requirements of the accounting standards.

Accounting and control procedures have been established in order to ensure the correctness and the legitimacy of the entries in the accounting books as well as the completeness and validity of the Financial Statements.

D. SHAREHOLDERS

1. General Meeting of Shareholders

The General Meeting of Shareholders is the supreme governing body of the Bank and resolves on all corporate affairs, in accordance with the applicable legislation. The resolutions of the General Meeting, which are in accordance with the applicable law, shall be binding upon absent and dissenting Shareholders as well.

In 2020, the Annual Ordinary General Meeting of Shareholders was held on 31.7.2020. The Bank, aiming to protect the Shareholders, its Employees and the public in general, applied all the precautionary safety measures for restricting the spread of Covid-19. It is pointed out that, due to the application of the precautionary safety measures for restricting the spread of Covid-19, no third parties, apart from the Shareholders and their proxies, were allowed to enter the Meeting area and no reception for the individuals present took place, as was customary.

The Annual Ordinary General Meeting of Shareholders of Alpha Bank was attended with regard to items 1, 2, 3, 4, 5, 6, 8, 9 and 10 of the agenda, in person or by proxy, by 326 Shareholders representing 49.12% of the voting share capital of the Bank, excluding the shares with voting rights issued in favor of the Hellenic Financial Stability Fund ("HFSF") (article 7a par. 3 of Law 3864/2010, as in force) and with regard to item 7 of the agenda, it was attended, in person or by proxy, by 327 Shareholders representing 54.70% of the voting share capital of the Bank including the shares with voting rights issued in favor of the HFSF.

All the items of the agenda were approved by the Ordinary General Meeting of Shareholders. The said items were the following:

1. Approval of the Annual and Consolidated Financial Statements of the financial year 2019 (1.1.2019 - 31.12.2019), together with the relevant reports of the Board of Directors and the Statutory Certified Auditors.
2. Approval, as per article 108 of Law 4548/2018, of the overall management for the financial year 2019 (1.1.2019 - 31.12.2019) and discharge of the Statutory Certified Auditors for the financial year 2019, in accordance with article 117 of Law 4548/2018.
3. Election of Statutory Certified Auditors for the financial year 2020 (1.1.2020 - 31.12.2020) and approval of their remuneration.
4. Approval of the Members of the Board of Directors' remuneration for the financial year 2019 (1.1.2019 - 31.12.2019).
5. Approval, in accordance with article 109 of Law 4548/2018, of the advance payment of remuneration to the Members of the Board of Directors for the financial year 2020 (1.1.2020 - 31.12.2020).
6. Deliberation and advisory vote on the Remuneration

Report, in accordance with article 112 of Law 4548/2018.

7. Establishment of a stock options plan for Members of the Management and of the Personnel of the Bank and its affiliated companies, within the meaning of article 32 of Law 4308/2014, in the form of stock options rights by issuing new shares, in accordance with article 113 of Law 4548/2018 and granting of authorization to the Board of Directors to settle procedural issues and details.
8. (a) Announcement on the election of Members of the Board of Directors in replacement of Members who resigned.
   (b) Appointment of Independent Members of the Board of Directors.
   (c) Composition of the Committees of the Board of Directors apart from the Audit Committee (for which see Item 9).
9. Composition of the Audit Committee.
10. Granting of authority, in accordance with article 98 of Law 4548/2018, to Members of the Board of Directors and the General Management as well as to Managers to participate in the boards of directors or in the management of companies having purposes similar to those of the Bank.

The Resolutions adopted at the Ordinary General Meeting of Shareholders of 2020 have been posted on the Bank's website (https://www.alpha.gr/en/group/investor-relations/general-meetings).

2. Communication with Shareholders, Investor Roadshows and Corporate Governance Meetings

In order to enhance the active participation of the Shareholders in the General Meetings and the genuine interest in issues relating to its operation, the Bank applies procedures of active communication with its Shareholders and establishes the appropriate conditions so that the policies and strategies adopted are based on the constructive exchange of views with them.

The Bank enhances its relations with proxy advisors and institutional investors who focus on corporate governance, providing them, where necessary, with further information so as to facilitate their decision-making process on corporate governance matters of the Bank in view of the General Meetings of Shareholders.

In particular, given the increasing interest of institutional investors and proxy advisors in corporate governance issues, bilateral meetings were held throughout the year with representatives from proxy advisors, analysts and investors.

Through this initiative, the Bank enhanced relations with stakeholders who focus on corporate governance, providing them, where necessary, with further information so as to assist their decision-making process, leading to further improving the Bank's corporate governance scores, while also facilitating their voting recommendations on governance matters in view of the upcoming General Meetings of Shareholders.

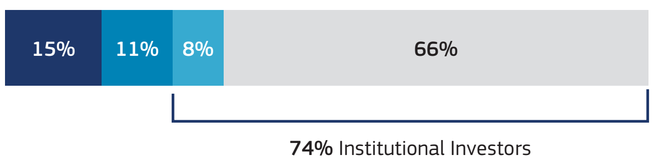
Following these meetings, the Bank enhanced the information provided in the ISS (Institutional Shareholder Services) database. As a result, the Bank's ISS rating during 2020 regarding governance has improved from 6 to 4 (1 being the best score).

In order to ensure the reliable, secure and broad dissemination of institutional information to its Shareholders, the Bank declares the "Officially Appointed Mechanism for the Central Storage of Regulated Information" of the Hellenic Exchanges – Athens Stock Exchange (ATHEX), which is currently managed by the Athens Exchange and operates through the "HERMES" communication system, in accordance with the Athens Exchange Rulebook (www.helex.gr), as the means of disclosure of regulated information and information provided by law to its Shareholders before the General Meeting. Through this disclosure, the prompt and non-discriminatory access to the relevant information is made available to the general public and particularly to the Shareholders, given that the above System, as recognized by law, is considered reliable for the effective dissemination of information to the investing public and meets the national and European range requirements of the law.

3. Shareholder Structure

Alpha Bank's shareholder base, on 31.12.2020, includes approximately **115,000** investors.

The breakdown of Alpha Bank shareholders on 31.12.2020 was, for descriptive (non-regulatory) purposes, as follows:



- **15%** Legal and Private Investors
- **11%** HFSF
- **8%** Greek Institutional Investors
- **66%** Foreign Institutional Investors

Alpha Bank shareholders, excluding the Hellenic Financial Stability Fund ("HFSF"), hold 1,374,525,214 voting shares of the Bank. On top of the above, the HFSF holds 169,174,167 common, registered, voting, dematerialized shares. The exercise of the voting rights of the HFSF shares is subject to restrictions, according to article 7a of Law 3864/2010.

E. BOARD OF DIRECTORS AND COMMITTEES

1. Board of Directors

The Board of Directors represents the Bank and is qualified to resolve on every action concerning the Bank's management, the administration of its property and the promotion of its scope of business in general. Indicatively, the Board of Directors is qualified to resolve on the issuance of all kinds of bond loans, with the exception of those which belong to the exclusive competence of the General Meeting.

The primary concern of the Board of Directors, while exercising its powers, is to promote the interests of the Bank, the Shareholders and its Employees as well as of other interested parties, as the case may be. The Board of Directors monitors the compliance and adherence to the provisions of the law within the framework of the corporate interest as well as the compliance to procedures of reliable and timely information and communication.

The Board of Directors consists of no fewer than nine and no more than fifteen Members (only odd numbers are allowed, while an even number can be accepted temporarily for a justified reason), including Executive and Non-Executive Members, in accordance with the provisions of the applicable legislation and the Relationship Framework Agreement (RFA) signed between the Bank and the Hellenic Financial Stability Fund. A legal entity may also participate in the Board of Directors as a Member, pursuant to article 77 par. 4 of Law 4548/2018.

Pursuant to the Presubscription Agreement of May 28, 2012, the Hellenic Financial Stability Fund is represented in the Board of Directors of the Bank. The representative of the Hellenic Financial Stability Fund is also a Member of the Audit Committee, the Risk Management Committee, the Remuneration Committee and the Corporate Governance and Nominations Committee of the Board of Directors.

Article 3 of Law 3016/2002 stipulates, inter alia, that the number of Non-Executive Members of the Board of Directors cannot be less than 1/3 of the total number of Members. Out of a total of thirteen Members of the Board of Directors of the Bank, the number of Non-Executive Members amounts to eleven, i.e. 84% of the total, thus exceeding by far the minimum number for such Members set by Law 3016/2002 (based on the composition of the Board of Directors for the year 2020).

In accordance with the above-mentioned article of Law 3016/2002, at least two Non-Executive Members should also be Independent and in accordance with the HFSF Law (Law 3864/2010), as in force, at least three Members should be Independent. In the Board of Directors of the Bank, the respective number exceeds the minimum requirements set by laws and amounts to seven, i.e. 54% of the total.

Board of Directors Composition 2020

15% Executive Members
54% Non-Executive Independent Members
31% Non-Executive Members

During 2020, the following changes took place pertaining to the composition of the Board of Directors:

Following the resignation of Mr. Demetrios P. Mantzounis, Non-Executive Member of the Board of Directors and Mr. George C. Aronis, Executive Member of the Board of Directors, the General Meeting of Shareholders held on 31.7.2020:

a. was informed that, in accordance with article 82 par. 1 of Law 4548/2018, the Board of Directors at its meeting held on 25.6.2020 proceeded with the election of Mr. Dimitris C. Tsitsiragos and Ms. Elanor R. Hardwick as Members of the Board of Directors of the Bank, effective as of 2.7.2020, in replacement of Mr. Demetrios P. Mantzounis and Mr. George C. Aronis who resigned on 31.12.2019 and 31.1.2020 respectively. Their tenure shall be equal to the remaining tenure of the Members who stepped down.

b. approved the appointment of Mr. Dimitris C. Tsitsiragos and of Ms. Elanor R. Hardwick, who fulfill the independence conditions and criteria, according to the applicable legal and regulatory framework, as Non-Executive Independent Members of the Board of Directors of the Bank. Their tenure shall be equal to the remainder of the tenure of the rest of the Members of the Board of Directors of the Bank, as this was determined during their election by the resolution of the Ordinary General Meeting of Shareholders dated 29.6.2018.

The Board of Directors was constituted into a body on 31.7.2020, in accordance with article 11 of the Articles of Incorporation.

The tenure of the Members of the Board of Directors is four years, even though Law 4548/2018, in force as of January 1, 2019, stipulates that the tenure can be up to six years. The Board's tenure ends at the Ordinary General Meeting of Shareholders which will take place in 2022.

The Board of Directors convenes every month or more often if necessary. The Articles of Incorporation of the Bank provide the Board of Directors with the option to meet by teleconference. The calendar of the meetings of the Board of Directors and its Committees for every year is set and notified to the Members at the end of the previous year.

The Minutes of the meetings of the Board of Directors and its Committees, on a regular basis, are signed at the next regular meeting of the Board of Directors or of the relevant Committee. During 2020 the meetings of the Board of Directors and its Committees took place via videoconference, due to precautionary and restraining safety measures for restricting the spread of Covid-19.

The Members of the Board of Directors comply with the stipulations of article 83 of Law 4261/2014 on the combination of directorships, as they do not hold more than one of the following combinations of directorships at the same time: (a) One Executive directorship and two Non-Executive directorships; (b) Four Non-Executive directorships, excluding directorships in organizations which do not pursue predominantly commercial objectives (e.g. non-profit, charities). Executive or Non-Executive directorships held within the same group are regarded as one directorship.

The Corporate Governance and Nominations Committee, at its meeting held in May 2020, after reviewing the independence criteria, confirmed that the Non-Executive Independent Members fulfill all the criteria for being Non-Executive Independent Members of the Board of Directors, in accordance with Law 3016/2002 on "Corporate Governance", the Articles of Incorporation and the Corporate Governance Code of the Bank, as in force.

The Secretariat of the Board of Directors supports the functionality of the Board of Directors, its Committees and its Members and, among others, coordinates communications between the Members of the Board of Directors and the Management of the Bank and the Group Companies in order to achieve the effective flow of information to and from the Board.

2. Composition of the Board of Directors

Chair

Vasileios T. Rapanos (Non-Executive Member)

Year of birth: 1947

Nationality: Hellenic

He is Professor Emeritus at the Faculty of Economics of the University of Athens and has been an Ordinary Member of the Academy of Athens since 2016. He studied Business Administration at the Athens School of Economics and Business (1975) and holds a Master's in Economics from Lakehead University, Canada (1977) and a PhD from Queen's University, Canada. He was Deputy Governor and Governor of the Mortgage Bank (1995-1998), Chairman of the Board of Directors of the Hellenic Telecommunications Organization (1998-2000), Chairman of the Council of Economic Advisors at the Ministry of Economy and Finance (2000-2004), member of the Board of Directors of the Public Debt Management Agency (PDMA) (2000-2004) as well as Chairman of the Board of Directors of the National Bank of Greece and of the Hellenic Bank Association (2009-2012). He has been the Chair of the Board of Directors of the Bank since May 2014.

Number of Alpha Bank shares owned on 31.12.2020: 0

EXECUTIVE MEMBERS

CEO

Vassilios E. Psaltis

Year of birth: 1968

Nationality: Hellenic

He holds a PhD and an MBA from the University of St. Gallen in Switzerland. He has worked as Deputy (acting) Chief Financial Officer at Emporiki Bank and at ABN AMRO Bank's Financial Institutions Group in London. He joined Alpha Bank in 2007. In 2010 he was appointed Group Chief Financial Officer (CFO) and in 2012 he was appointed General Manager. Through these posts, he spearheaded capital raisings of several billions from foreign institutional shareholders, diversifying the Bank's shareholder base, as well as significant mergers and acquisitions that contributed to the consolidation of the Greek banking market, reinforcing the position of the Bank. He was voted seventh best CFO among European banks (2014 and 2018) by institutional investors and analysts in the Extel international survey. He has been a Member of the Board of Directors of the Bank since November 2018 and Chief Executive Officer since January 2019.

Number of Alpha Bank shares owned on 31.12.2020: 532

Spyros N. Filaretos

Year of birth: 1958

Nationality: Hellenic

He studied Economics at the University of Manchester and at the University of Sussex. He joined the Bank in 1985. He was appointed Executive General Manager in 1997 and General Manager in 2005. From October 2009 to November 2020 he served as Chief Operating Officer (COO). In December 2020 he was appointed General Manager – Growth and Innovation. He has been a Member of the Board of Directors of the Bank since 2005.

Number of Alpha Bank shares owned on 31.12.2020: 0

George C. Aronis (until 31.1.2020)

Year of birth: 1957

Nationality: Hellenic

He studied Finance and holds an MBA from the Athens Laboratory of Business Administration. He has worked in ABN AMRO BANK both in Greece and abroad and he served for five years as General Manager Consumer Banking. In 1999 he joined the National Bank of Greece Group and served in managerial positions and in 2002 he was appointed General Manager Retail Banking. He joined Alpha Bank in 2004 as Retail Banking Manager. In 2006 he was appointed Executive General Manager and in 2008 General Manager, supervising the Retail and Wholesale Banking Business Units. He was a Member of the Board of Directors of the Bank from 2011 to January 2020.

NON-EXECUTIVE MEMBERS

Efthimios O. Vidalis

Year of birth: 1954

Nationality: Hellenic

He holds a BA in Government from Harvard University and an MBA from the Harvard Graduate School of Business Administration. He held several leadership positions for almost 20 years at Owens Corning, where he served as President of the Global Composites and Insulation Business Units. He joined S&B Industrial Minerals S.A. in 1998 as Chief Operating Officer (1998-2001), became the first non-family Chief Executive Officer (2001-2011) and served on the Board of Directors for 15 years. He was a member of the Board of Directors of Future Pipe Industries (Dubai, U.A.E.) from 2008 to 2019, Chairman of the Board of Directors of the Greek Mining Enterprises Association (2005-2009) and member of the Board of Directors of the Hellenic Federation of Enterprises (SEV) from 2006 to 2016, where he served as Vice Chairman (2010-2014) and as Secretary General (2014-2016). Furthermore, he is the founder of the SEV Business Council for Sustainable Development and was the Chairman thereof from 2008 to 2016. He was elected President of the Executive Committee of SEV during the Annual General Meeting, held in June 2020. He is a non-executive member of the Board of Directors of Titan Cement Company S.A. and Fairfield-Maxwell Ltd (U.S.A.). He has been a Member of the Board of Directors of the Bank since May 2014. He is a Member of the Audit Committee and of the Corporate Governance and Nominations Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Artemios Ch. Theodoridis

Year of birth: 1959

Nationality: Hellenic

He studied Economics at the Athens University of Economics and Business and holds an MBA from the University of Chicago. He joined the Bank as Executive General Manager in 2002 and was appointed General Manager in 2005. From 2017 to November 2020, he supervised the Non-Performing Loans and the Treasury Management Business Units. In December 2020, he stepped down from the Management of the Bank and joined Cepal as Executive Chair. He has been a Member of the Board of Directors of the Bank since 2005.

Number of Alpha Bank shares owned on 31.12.2020: 50,000

NON-EXECUTIVE INDEPENDENT MEMBERS

Dimitris C. Tsitsiragos

Year of birth: 1963

Nationality: Hellenic

He holds a BA in Economics from Rutgers University and an

MBA from the George Washington University. He completed the World Bank Group Executive Development Program at the Harvard Business School. He spent 28 years at the International Finance Corporation (IFC) – World Bank Group. He held progressive positions in the Oil, Gas and Mining and in the Central and Eastern Europe Departments, including the positions of Manager, Oil and Gas, and Manager, Manufacturing and Services, based in Washington, D.C., USA (1989-2002). Furthermore, he held director positions for South Asia (India), Global Manufacturing and Services (Washington, D.C.) and Middle East, North Africa and Southern Europe (Cairo, Egypt), overseeing IFC's global and regional investment operations (2002-2011). In 2011, he was promoted to Vice President, EMENA region (Istanbul, Turkey) and in 2014 he was appointed Vice President Investments/Operations (Istanbul/Washington). He currently sits on the Board of Directors of Titan Cement International and serves as a Senior Advisor, Emerging Markets at Pacific Investment Management Company (PIMCO) in London, UK. He previously served as a non-executive independent Board member at the Infrastructure Development Finance Company (IDFC), India and at the Commercial Bank of Ceylon (CBC), Sri Lanka. He has been a Member of the Board of Directors of the Bank since July 2020. He is a Member of the Risk Management Committee and of the Remuneration Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Jean L. Cheval

Year of birth: 1949

Nationality: French

He studied Engineering at the École Centrale des Arts et Manufactures, while he holds a DES (Diplôme d'Études Spécialisées) in Economics (1974) from the University of Paris I. Additionally he holds a DEA (Diplôme d' Études Approfondies) in Statistics and a DEA in Applied Mathematics from the University of Paris VI. After starting his career at BIPE (Bureau d'Information et de Prévisions Économiques), he served in the French public sector (1978-1983) and then worked at Banque Indosuez-Crédit Agricole (1983-2001), wherein he held various senior management positions, including the positions of Chief Economist, Head of Corporate Planning and Head of Asset-based Finance and subsequently he became General Manager. He served as Chairman and CEO of the Banque Audi France (2002-2005) as well as Chairman of the Banque Audi Suisse (2002-2004). Furthermore, he served as Head of France at the Bank of Scotland (2005-2009). As of 2009 he has been working at Natixis in various senior management positions, such as Head of the Structured Asset Finance Department and Head of Finance and Risk, second "Dirigeant effectif" of Natixis, alongside the CEO. He is currently a member of the Board of Directors of EFG-Hermes, Egypt, Chairman of the Steering Committee of Natixis Algérie and Chairman of the Natixis Foundation for Research and Innovation. He has been a Member of the Board of Directors of the Bank since June 2018. He is a Member of the Risk Management Committee and of the Remuneration Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Carolyn G. Dittmeier

Year of birth: 1956

Nationality: Italian and US

She holds a BSc in Economics from the Wharton School of the University of Pennsylvania. She is a Statutory Auditor, a Certified Public Accountant (CPA), a Certified Internal Auditor (CIA) and a Certified Risk Management Assurance (CRMA) professional, focusing on the audit and risk management sectors. Additionally, she has obtained a Qualification in Internal Audit Leadership (QIAL). She commenced her career in the US at the auditing and consulting firm Peat Marwick & Mitchell (now KPMG) where she reached the position of Audit Manager, and subsequently assumed managerial responsibilities in the Montedison Group as Financial Controller and later as Head of Internal Audit. In 1999, she launched the practice of corporate governance services in KPMG Italy. Subsequently, she took on the role of Chief Internal Audit Executive of the Poste Italiane Group (2002-2014). She has carried out various professional and academic activities focusing on risk and control governance and has written two books. She was Vice Chair (2013-2014) and Director of the Institute of Internal Auditors (2007-2014), Chair of the European Confederation of Institutes of Internal Auditing (2011-2012) and Chair of the Italian Association of Internal Auditors (2004-2010). Furthermore, she served as Independent Director and Chair of the Risk and Control Committee of Autogrill SpA (2012-2017) as well as of Italmobiliare SpA (2014-2017). Since 2014 she has been Chair of the Board of Statutory Auditors of Assicurazioni Generali SpA and a member of the Boards and/or the Audit Committees of some non-financial companies (Moncler, Illycaffè). She has been a Member of the Board of Directors of the Bank since January 2017 and is currently Chair of the Audit Committee and a Member of the Corporate Governance and Nominations Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Richard R. Gildea

Year of birth: 1952

Nationality: British

He holds a BA in History from the University of Massachusetts (1974) and an MA in International Economics, European Affairs from the Johns Hopkins University School of Advanced International Studies (1984). He served in JP Morgan Chase, in New York and London, from 1986 to 2015, wherein he held various senior management positions throughout his career. He was Emerging Markets Regional Manager for the Central and Eastern Europe Corporate Finance Group, London (1993-1997) and Head of Europe, Middle East and Africa (EMEA) Restructuring, London (1997-2003). He also served as Senior Credit Officer in EMEA Emerging Markets, London (2003-2007) and Senior Credit Officer for JP Morgan's Investment Bank Corporate Credit in EMEA Developed Markets, London (2007-2015), wherein, among others, he was Senior Risk Representative to senior committees. He is currently a member of the Board of Advisors at the Johns Hopkins University School of Advanced International Studies, Washington D.C., where he chairs the Finance Committee, as well as a member of Chatham House (the Royal Institute of International Affairs), London. He has been a Member of the Board of Directors of the Bank since July 2016. He is the Chair of the Remuneration Committee and a Member of the Risk Management Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Elanor R. Hardwick

Year of birth: 1973

Nationality: British

She holds an MA (Cantab) from the University of Cambridge and an MBA from the Harvard Business School. She commenced her career in 1995 at the UK Government's Department of Trade and Industry, focusing on the Communications and Information Industries policy, and subsequently held roles as a strategy consultant with Booz Allen Hamilton's Tech, Media and Telco practice and with the Institutional Equity Division of Morgan Stanley. Since 2005, she has held various roles, including Global Head of Professional Publishing and Global Head of Strategy, Investment Advisory at Thomson Reuters (now Refinitiv). Afterwards, she joined the team founding FinTech startup Credit Benchmark, becoming its CEO (2012-2016). Then, she served as Head of Innovation at Deutsche Bank (2016-2018) and as Chief Digital Officer at UBS (2019-2020). Since 2018 she has served as a non-executive member of the Board of Directors of specialty (re)insurer Axis Capital, while she is also a member of the Risk Committee, the Compensation Committee and the Corporate Governance and Nominating Committee. She is a non-executive member of the Board of Directors of Itiviti Group AB and as of January 2021 she is an external member of the Audit Committee of the University of Cambridge. She has been a Member of the Board of Directors of the Bank since July 2020. She is a Member of the Audit Committee and of the Corporate Governance and Nominations Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Shahzad A. Shahbaz

Year of birth: 1960

Nationality: British

He holds a BA in Economics from Oberlin College, Ohio, U.S.A. He has worked at various banks and investment firms, since 1981, including the Bank of America (1981-2006), from which he left as Regional Head (Corporate and Investment Banking, Continental Europe, Emerging Europe, Middle East and Africa). He served as Chief Executive Officer (CEO) of NBD Investment Bank/Emirates NBD Investment Bank (2006-2008), and of QInvest (2008-2012). He is currently the Group CIO of Al Mirqab Holding Co. He is also a member of the Board of Directors of El Corte Inglés and of Seafox. He has been a Member of the Board of Directors of the Bank since May 2014. He is the Chair of the Corporate Governance and Nominations Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

Jan A. Vanhevel

Year of birth: 1948

Nationality: Belgian

He studied Law at the University of Leuven (1971), Financial Management at Vlekho (Flemish School of Higher Education in Economics), Brussels (1978) and Advanced Management at INSEAD (The Business School for the World), Fontainebleau. He joined Kredietbank in 1971, which became KBC Bank and Insurance Holding Company in 1998. He acquired a Senior Management position in 1991 and joined the Executive Committee in 1996. In 2003 he was in charge of the non-Central European branches and subsidiaries, while in 2005 he became responsible for the KBC subsidiaries in Central Europe and Russia. In 2009 he was appointed CEO and implemented the Restructuring Plan of the group until 2012, when he retired. From 2008 to

2011 he was President of the Fédération belge du secteur financier (Belgian Financial Sector Federation) and a member of the Verbond van Belgische Ondernemingen (Federation of Enterprises in Belgium), while he has been the Secretary General of the Institut International d'Études Bancaires (International Institute of Banking Studies) since May 2013. He was also a member of the Liikanen Group on reforming the structure of the EU banking sector. Currently, he is a Board member of a private industrial multinational company and of a private equity company. He has been a Member of the Board of Directors of the Bank since April 2016. He is the Chair of the Risk Management Committee and a Member of the Audit Committee.

Number of Alpha Bank shares owned on 31.12.2020: 0

NON-EXECUTIVE MEMBER PURSUANT to the provisions of Law 3864/2010

Johannes Herman Frederik G. Umbgrove

Year of birth: 1961

Nationality: Dutch

He holds an LL.M. in Trade Law (1985) from Leiden University and an MBA from INSEAD (The Business School for the World), Fontainebleau (1991). Additionally, he attended the IN-BOARD Non-Executive Directors Program at INSEAD. He worked at ABN AMRO Bank N.V. (1986-2008), wherein he held various senior management positions throughout his career. He served as Chief Credit Officer Central and Eastern Europe, Middle East and Africa (CEEMEA) of the Global Markets Division at The Royal Bank of Scotland Group (2008-2010) and as Chief Risk Officer and member of the Management Board at Amsterdam Trade Bank N.V. (2010-2013). From 2011 until 2013 he was Group Risk Officer at Alfa Bank Group Holding and as of 2014 he has been a Risk Advisor at Sparrenwoude B.V. He has been a member of the Supervisory Board of Demir Halk Bank (Nederland) N.V. since 2016 and in 2018 he became the Chairman of the Supervisory Board thereof. He is currently the Chair of the Supervisory Board, of the Nomination and Remuneration Committee as well as a member of the Risk and Audit Committee, of the Related Party Transactions Committee and of the Supervisory Board Credit Committee of Demir Halk Bank N.V. Furthermore, he has been an independent member of the Supervisory Board of Lloyds Bank GmbH since December 2019. He has been a Non-Executive Member of the Board of Directors of the Bank, representing the Hellenic Financial Stability Fund, since April 2018. He is a Member of all the Committees of the Board of Directors.

Number of Alpha Bank shares owned on 31.12.2020: 0

Secretary

George P. Triantafyllides

He was born in Athens in 1963. He holds a BSc from Oregon State University. He has served as a Naval Officer in the United States Navy. He joined the Bank in 1994 and has worked in various areas of responsibility, while in 2001 he was assigned to the Secretariat of the Board of Directors. He has been the Manager of the Secretariat of the Board of Directors and the Secretary of the Board of Directors of the Bank since 2014.

3. Profile of the Board of Directors and Committee Membership for the year 2020

Board of Directors		Gender	Age	Tenure	Term ends	Committees			
						Audit	Risk Management	Remuneration	Corporate Governance and Nominations
Chair (Non-Executive Member)									
Vasileios T. Rapanos		M	73	6	2022	-	-	-	-
Executive Members									
Vassilios E. Psaltis	CEO	M	52	2	2022	-	-	-	-
Spyros N. Filaretos	General Manager	M	62	15	2022	-	-	-	-
George C. Aronis [1]		M	63	9	2022	-	-	-	-
Non-Executive Members									
Efthimios O. Vidalis		M	66	6	2022	M	-	-	M
Artemios Ch. Theodoridis [2]		M	61	15	2022	-	-	-	-
Non-Executive Independent Members									
Dimitris C. Tsitsiragos		M	57	6 months	2022		M	M	
Jean L. Cheval		M	71	2	2022	-	M	M	-
Carolyn G. Dittmeier		F	64	3	2022	C	-	-	M
Richard R. Gildea		M	68	4	2022	-	M	C	-
Elanor R. Hardwick		F	47	6 months	2022	M	-	-	M
Shahzad A. Shahbaz		M	60	6	2022	-	-	-	C
Jan A. Vanhevel		M	72	4	2022	M	C	-	-
Non-Executive Member (pursuant to the provisions of Law 3864/2010)									
Johannes Herman Frederik G. Umbgrove		M	59	2	2022	M	M	M	M

C: Chair / M: Member / - : The Member does not participate in this Committee

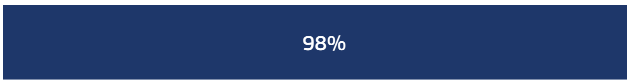
[1] Member of the Board of Directors until 31.1.2020

[2] Executive Member until 1.12.2020 and Non-Executive Member as of 1.12.2020

4. Board and Committees attendance

In 2020, the Board of Directors convened twenty one (21) times. The average participation rate of the Members of the Board of Directors in the meetings stood at 98% (based on the composition of the Board of Directors on 31.12.2020).

Board Meetings Average Attendance



The Board has established an attendance objective which stipulates that the Members should attend more than 85% of the Board of Directors meetings physically or by videoconference/teleconference. The Corporate Governance and Nominations Committee deemed that there were no Member absences from Board meetings without a valid reason. The Members of the Board of Directors who were absent had informed the Bank in time of the relevant reasons.

The table of the attendance rates of the Members of the Board of Directors is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/administrative-structure/board-of-directors).

5. 2020 Board Members' Individual Attendance Rates at Meetings

Board of Directors		Audit Committee	Risk Management Committee	Remuneration Committee	Corporate Governance and Nominations Committee
Number of meetings	**21**	**13**	**12**	**12**	**11**
Chair (Non-Executive Member)					
Vasileios T. Rapanos	100%	-	-	-	-
Executive Members					
Vassilios E. Psaltis CEO	100%	-	-	-	-
Spyros N. Filaretos General Manager	100%	-	-	-	-
George C. Aronis [1]	100%	-	-	-	-
Non-Executive Members					
Efthimios O. Vidalis [2]	100%	100%	-	86%	100%
Artemios Ch. Theodoridis [3]	95%	-	-	-	-
Non-Executive Independent Members					
Dimitris C. Tsitsiragos [4]	100%	-	100%	100%	-
Jean L. Cheval [5]	95%	100%	100%	100%	100%
Carolyn G. Dittmeier [6]	95%	100% / C	86%	-	100%
Richard R. Gildea	100%	-	100%	100% / C	-
Elanor R. Hardwick [7]	100%	100%	-	-	100%
Shahzad A. Shahbaz	86%	-	-	-	100% / C
Jan A. Vanhevel	100%	100%	100% / C	-	-
Non-Executive Member (pursuant to the provisions of Law 3864/2010)					
Johannes Herman Frederik G. Umbgrove	95%	85%	83%	92%	100%

C: Chair / - : The Member does not participate in this Committee

1. Member until 31.1.2020
2. Member of the Remuneration Committee until 31.7.2020
3. Executive Member until 1.12.2020 and Non-Executive Member as of 1.12.2020
4. Non-Executive Member of the Board of Directors from 2.7.2020 until 31.7.2020 and Non-Executive Independent Member of the Board of Directors as of 31.7.2020
   - Member of the Risk Management Committee as of 31.7.2020
   - Member of the Remuneration Committee as of 31.7.2020
5. - Member of the Risk Management Committee as of 31.7.2020
   - Member of the Audit Committee until 31.7.2020
   - Member of the Corporate Governance and Nominations Committee until 31.7.2020
6. - Member of the Corporate Governance and Nominations Committee as of 31.7.2020
   - Member of the Risk Management Committee until 31.7.2020
7. Non-Executive Member of the Board of Directors from 2.7.2020 until 31.7.2020 and Non-Executive Independent Member of the Board of Directors as of 31.7.2020
   - Member of the Audit Committee as of 31.7.2020
   - Member of the Corporate Governance and Nominations Committee as of 31.7.2020

6. Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders

The Bank has adopted the Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders (the "Policy") which sets the principles and the framework for the selection, appointment and re-appointment of Members of the Board of Directors as well as the criteria to be used in their assessment. It also addresses the appointment and re-appointment of the Key Function Holders of the Bank, i.e. the Chief Financial Officer, the Chief Risk Officer, the Head of the Internal Audit Division and the Head of the Compliance Division.

The Policy complies with the legislative and regulatory framework in force, including the relevant Joint ESMA and EBA Guidelines on "the assessment of the suitability of members of the management body and key function holders", as well as with European best practices in corporate governance. It also meets the requirements stipulated in the Relationship Framework Agreement (RFA) signed between the Bank and the Hellenic Financial Stability Fund (HFSF).

The objectives of the Policy are to:

- Set general principles that provide guidance to the Corporate Governance and Nominations Committee (the "CGNC") and its Chair on selecting, vetting and proposing candidates to the Board of Directors.
- Set criteria for the selection and suitability assessment of Board of Directors candidates.
- Set criteria for the assessment of the ongoing individual suitability of the Members of the Board of Directors as well as the collective suitability of the Board of Directors.
- Set criteria for the selection and the appointment of Key Function Holders.
- Establish a transparent, effective and time-efficient suitability and nomination process.

The Policy is approved by the Board of Directors and reviewed annually by the Corporate Governance and Nominations Committee.

The CGNC will not propose candidates which it deems not suitable to become Members of the Board of Directors according to the criteria set out in the Policy. Suitability is determined in relation to the Policy's criteria for candidates (fit and proper and general suitability) and current composition needs. For the purposes of the Policy, it is defined as the degree to which an individual is deemed to have good repute and to have, individually and collectively with other individuals, adequate knowledge, skills and experience to perform his/her duties. Suitability also covers the honesty, integrity and independence of mind of each individual and his or her ability to commit sufficient time to perform his or her duties.

In order to be considered as suitable candidates by the Board and its CGNC, prospective nominees must: meet the fit and proper requirements, meet individual and collective suitability requirements, have no systematic conflict of interests with the Bank, be able to devote sufficient time to the Board of Directors. All nominees must submit a declaration stating that they meet the relevant requirements.

7. External Evaluation of the Board of Directors

The Board of Directors, in accordance with the Corporate Governance Code and the Policy for the Annual Evaluation of the Alpha Bank Board of Directors it has adopted, assesses on an annual basis its effectiveness as well as that of its Committees. Every three years, the Board of Directors may appoint an external consultant to conduct these assessments.

The overall evaluation of the Board of Directors and its Committees, for the year 2019, was conducted by Nestor Advisors Limited, a London-based corporate governance consulting firm, with the assistance of the Corporate Governance and Nominations Committee. The Individual Evaluation of the Members of the Board of Directors was conducted by the Chair of the Board of Directors.

The main highlights of the overall evaluation for the year 2019 are the following:

- The Board of Directors' overall score has increased considerably compared to 2018 and 2017.
- The effectiveness of the Committees of the Board of Directors is the highest scoring area, showing a significant improvement compared to 2018.

Additionally, the Corporate Governance and Nominations Committee ascertained that the current composition of all the Committees of the Board of Directors, namely the Audit Committee, the Risk Management Committee, the Remuneration Committee and the Corporate Governance and Nominations Committee, meets the requirements of the regulatory framework, is consistent with the principles of Corporate Governance of the Bank and contributes to the effective and smooth operation of the Committees and the Bank.

The composition of the Board of Directors reflects the knowledge, skills and experience necessary to fulfill its responsibilities. This entails that the Board of Directors collectively has an appropriate understanding of those areas for which the Members are collectively accountable and the skills to effectively manage and oversee the Bank.

While the Executive Members have a high level of managerial skills, the Non-Executive Members have sufficient management skills to organize the Board of Directors' tasks effectively and to be able to understand and challenge the management practices applied and the decisions taken by the Executive Members.

The Corporate Governance and Nominations Committee also ascertained that the Members of the Board of Directors represent different business sectors as well as different geographical areas and are acknowledged for their character, integrity, ability of leadership, management, thought and constructive collective operation in a team environment as well as for their financial knowledge and other professional and business experience. The level of experience and knowledge of all the Members of the Board of Directors and its Committees was evaluated by the Board of Directors as very high, while their work was evaluated as extremely effective.

8. Reassessment of the Board Members' collective suitability based on ESMA/EBA Guidelines

During 2020, further to the aforementioned evaluation of the Board of Directors, a reassessment of the Board Members' collective suitability in terms of knowledge, skills and experience based on the Joint ESMA/EBA Guidelines on "the assessment of the suitability of members of the management body and key function holders" (the "Joint ESMA/EBA Guidelines") was conducted with the support of the Corporate Governance and Nominations Committee.

In this context and for the purposes of preparing the assessment of the collective suitability, each Member of the Board of Directors conducted an Individual Self-Assessment based on the criteria listed in the Joint ESMA/EBA Guidelines. The Chair of the Board of Directors completed the Collective Suitability Matrix of the Joint ESMA/EBA Guidelines based on the Individual Self Assessments and examining, among others, the areas of governance, risk management, compliance, audit, management, strategy, decision-making and past experience, as suggested by the said Guidelines.

Based on the approved Collective Suitability Matrix, the Board of Directors resolved that in order to enhance the collective suitability of the Board, emphasis should be given on continuous training and informative sessions.

9. Cooperation of the Non-Executive Members with the Executive Members

The Non-Executive Members of the Board of Directors reviewed issues of potential conflict of interests between the Bank and the Executive Members.

Additionally, the good cooperation between all the Executive Members of the Board of Directors and their Non-Executive peers was highlighted.

The Executive Members stand out for their professional expertise, their quality of character, their integrity and their team spirit. They devote sufficient time and demonstrate the required commitment in order to fully comply with the constantly increasing regulatory reporting requirements.

The Non-Executive Members of the Board of Directors expressed their satisfaction to the Executive Members about their positive contribution to the management of the Bank.

10. Induction and Training

10.1 Induction and Training Policy for the Members of the Board of Directors

The Induction and Training Policy for the Members of the Board of Directors sets the principles and the approach for the induction and training programs addressed to the Members of the Board of Directors in accordance with the legislative and regulatory framework in force, including the relevant Joint ESMA and EBA Guidelines on "the assessment of the suitability of members of the management body and key function holders", as well as with European best practices in corporate governance.

The Policy applies to the Members of the Board of Directors individually and/or collectively.

The objectives of the induction and training programs provided to the Board of Directors are to:

- facilitate the Board of Directors' clear understanding of the Bank's structure, business model, risk profile and governance arrangements as well as the role of the Member(s) within them,
- facilitate the Board of Directors' clear understanding of the international, European and national economic and regulatory developments in the financial sector and their impact on the Bank,
- promote the Board of Directors' awareness regarding the benefits of diversity in the Board of Directors and the Bank, and
- improve the skills, knowledge or competence of the Members of the Board of Directors to fulfil their responsibilities on an ongoing or on an ad hoc basis.

10.2. Induction and Training Programs for the Members of the Board of Directors

The Bank offers to the new Members of the Board of Directors an induction program on Legal and Regulatory requirements, Corporate Governance principles, Risk Management, Internal Audit, Compliance, Capital Adequacy, Financial and Accounting Services, Information Technology and Security, and Strategic Planning as well as the possibility for relevant informative sessions.

During 2020 and in accordance with the Induction and Training Policy for the Members of the Board of Directors, an Induction Program for the new Members of the Board of Directors, Mr. D.C. Tsitsiragos and Ms. E.R. Hardwick, took place. During this Induction Program the new Members also met with the Chair of the Board of Directors, the CEO, General Managers, Executive General Managers and the Secretary of the Board of Directors.

Additionally, the Bank provides continuous informative sessions to the Members of the Board of Directors in order to update them on current issues of the banking market and on the regulatory developments in the financial sector.

The Bank also provides its Board Members with the opportunity to participate in training and education sessions offered by external institutions. Upon request by any Member, the Bank may offer tailor-made programs to further enhance the Members' knowledge and competences.

11. Committees of the Board of Directors

The Board of Directors may establish permanent or ad hoc Committees to assist it in the discharge of its responsibilities, facilitate its operations and effectively support its decision-making. The Committees have an advisory role but may also assume delegated authorities, as determined by the Board. Each Committee has its dedicated Charter prescribing its composition, tenure, functioning and responsibilities.

Four Committees operate at Board level, namely the Audit Committee, the Risk Management Committee, the Remuneration Committee and the Corporate Governance and Nominations Committee. Each Committee consists of no fewer than three Members and shall be deemed in quorum when at least three Members are present, whether physically or by teleconference.

The Members of the Committees are appointed by the Board of Directors, following recommendations by the Corporate Governance and Nominations Committee. The Committees consist of Non-Executive Members. The Chairs of the Committees are Non-Executive Independent Members of the Board of Directors. They may be assisted in their work by other persons, including external advisors.

The major focus of the Committees is placed on the oversight and diligence of policies, practices and procedures within their specific area of mandate, in the preparation of draft resolutions to be approved by the Board of Directors and in the submission of relevant briefings, reports, key information and recommendations to the Board. The Committees report regularly to the Board of Directors about their work.

Audit Committee

The Board of Directors, at its meeting held on 23.11.1995, resolved on the establishment of an Audit Committee for Alpha Bank and the Group Companies. The Audit Committee of the Bank currently constitutes a Committee of the Board of Directors and the Members were appointed by a resolution of the Annual Ordinary General Meeting of Shareholders of 31.7.2020.

Chair:	Carolyn G. Dittmeier
Number of Members:	5
Number of meetings in 2020:	13
Average participation rate of the Members:	97.5% (based on the Committee's composition on 31.12.2020)

Audit Committee Composition

60% Non-Executive Independent Members

40% Non-Executive Members

(Based on the composition of the Audit Committee on 31.12.2020)

The main responsibilities of the Audit Committee include but are not limited to those presented below.

The Committee:

- Performs the oversight of the financial reporting processes and procedures for drawing up the Annual and the Interim Financial Statements of the Bank and the Group.
- Reviews the quarterly Financial Statements of the Bank and of the Group, together with the annual Statutory Auditors' Report and the Board of Directors' Annual Management Report prior to their submission to the Board of Directors for approval.
- Oversees the establishment of accounting policies and focuses on the compliance with the accounting principles and practices.

- Monitors and assesses, on an annual basis, the adequacy, effectiveness and efficiency of the Internal Control System of the Bank and the Group.
- Assists the Board of Directors in ensuring the independent, objective and effective conduct of internal and external audits of the Bank.
- Assists the Board of Directors in overseeing the effectiveness and performance of the Internal Audit Division and the Compliance Division of the Bank.
- Reviews the activity and performance of the Statutory Certified Auditors of the Bank and the Group on a regular basis.
- Is responsible for the procedure pertaining to the selection of the Statutory Certified Auditor of the Bank and the Group and makes recommendations to the Board of Directors on the appointment or dismissal, rotation, tenure and remuneration of the Statutory Certified Auditors, according to the relevant regulatory and legal provisions.
- Monitors the independence of the Statutory Certified Auditors in accordance with the applicable laws, a procedure which includes reviewing, inter alia, the provision by them of Non-Audit Services to the Bank and the Group. In relation to this, the Committee examines or approves all proposals regarding the provision by the Statutory Certified Auditor of Non-Audit Services to the Bank and the Group, based on the relevant Bank policy that the Audit Committee oversees and recommends to the Board of Directors for approval.

The specific duties and responsibilities of the Audit Committee are set out in its Charter, which is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/commitees).

During 2020 the main activities of the Committee, among others, were the following:

The Committee:

- Evaluated the following annual reports for the year 2019 which were submitted to the Bank of Greece:
  - the Regulatory Compliance Report,
  - the evaluation of the adequacy and effectiveness of the Anti-Money Laundering and Combating the Financing of Terrorism Policy,
  - the evaluation of the adequacy and effectiveness of the Internal Control System of the Alpha Bank Group by the Internal Audit Division,
  - the Independent Assessment Report regarding the custody of Alpha Bank customer assets.
- Reviewed the report conducted by an external auditor for the "Evaluation of the System of Internal Controls of Alpha Bank and the Group for the years 2017-2019", in accordance with the Bank of Greece Governor's Act 2577/2006 and submitted it to the Bank of Greece. The Committee was also informed of the external auditor's report on the External Quality Assessment (EQA) of the Internal Audit Division.
- Was informed of the monthly and the quarterly activity reports of the Internal Audit Division and the Compliance Division, based on the annual plans previously endorsed by the Committee.
- Was informed about the re-assessment of the annual audit plan of the Internal Audit Division, in light of the Covid-19 pandemic, and reviewed the incorporation therein of newly-emerged risks, following a risk-based approach. In the context of the Covid-19 pandemic, the Bank adjusted its way of operations in order to ensure business continuity, to comply with emergency state requirements and to ensure the safety of its Personnel. The Internal Audit Division assessed the emerging risks and the impact on the Bank's control environment and responded with new audits and adjustments to the Group Annual Audit Plan, in accordance with the respective standards. In particular, the Internal Audit Division successfully performed a mid-year high-level risk assessment in order to incorporate the emerging risks of Covid-19.
- Reviewed the general evaluation conducted by a well-known advisory firm regarding the compliance perimeter and the overall scope of activities.
- Submitted to the Board of Directors for approval the fees of Deloitte Certified Public Accountants S.A. and of SOL S.A. for the statutory audit of the Financial Statements of the Bank and the Group Companies for the year 2020.
- Reviewed the annual Financial Statements preparation for the Bank and the Group for the year 2019 as well as the quarterly Financial Statements of the Group and the semi-annual Financial Statements for the Bank and the Group for the year 2020, prior to their submission to the Board of Directors for approval.
- Monitored the impact of the Covid-19 pandemic on the Financial Statements of the Bank and the Group as well as on the quarterly progress reports of the Internal Audit Division and of the Compliance Division.
- Was informed of the impact of Covid-19 on operational risk.

- Performed the oversight of the Statutory Certified Auditors' (Deloitte) activity, performance and independence and reviewed the Statutory Certified Auditors' Audit Plan for 2020.
- Monitored the independence of statutory auditors, in accordance with the laws in force, and, in particular, as regards the provision of non-audit services to the Bank and the Group.
- Monitored the procedure followed for the drafting of the Non-Financial Report and the Corporate Responsibility Report.
- Supervised the selection process of the new Head of Internal Audit and assisted the Remuneration Committee regarding her remuneration.
- Reviewed the organization, independence and capacity of the Internal Audit Division and the Compliance Division.
- Was updated on the Whistleblowing Committee meetings.
- Acquired a full understanding of the Risk Management Unit through the participation of some of its Members in the Risk Management Committee and reviewed the operational risk reports with regard to the relevant impact on the Internal Control System.

Regarding the Subsidiaries, the Committee:

- Met on a regular basis with the Subsidiaries' Audit Committees and reviewed their Annual and Semi-Annual Activity Reports regarding the fulfillment of their responsibilities.

Risk Management Committee

The Board of Directors, at its meeting held on 19.9.2006, resolved on the establishment of a Risk Management Committee for Alpha Bank and the Group Companies. The Members of the current Risk Management Committee of the Bank were appointed by a resolution of the Annual Ordinary General Meeting of Shareholders of 31.7.2020.

Chair:	Jan A. Vanhevel
Number of Members:	5
Number of meetings in 2020:	12
Average participation rate of the Members:	95% (based on the Committee's composition on 31.12.2020)

Risk Management Committee Composition

80% Non-Executive Independent Members

20% Non-Executive Members

(Based on the composition of the Risk Management Committee on 31.12.2020)

The main responsibilities of the Risk Management Committee include but are not limited to those presented below.

The Committee:

- Assists the Board of Directors in promoting a sound risk culture at all levels throughout the Bank and the Group, fostering risk awareness and encouraging open communication and challenge across the Organization.
- Assists the Board of Directors in monitoring the achievement of objectives in risk management, especially in the areas of NPEs and capital ratio.
- Reviews and recommends to the Board of Directors for approval the risk and capital management strategy.
- Reviews and recommends annually to the Board of Directors for approval the Group's risk appetite framework and statement, ensuring alignment with the Group's strategic objectives and capital allocation. In this context, the Committee sets the Bank's risk capacity, portfolio limits and tolerance in all key areas of the Bank's activity.
- Determines the principles which govern risk management across the Bank and the Group in terms of the identification, measurement, monitoring, control, and mitigation of risks.
- Evaluates on an annual basis or more frequently, if necessary, the appropriateness of risk identification and measurement systems, methodologies and models, including the capacity of the Bank's IT infrastructure to record, report, aggregate and process risk-related information.
- Reviews regularly, at least annually, the Group's Internal Capital Adequacy Assessment Process (ICAAP) and the Internal Liquidity Adequacy Assessment Process (ILAAP) as well as the related target ratios and recommends their approval to the Board of Directors.
- Assesses the overall effectiveness of capital planning, allocation processes and systems, and the allocation of

capital requirements to risk types.

- Keeps itself informed of recent regulatory developments, emerging supervisory expectations, the results of supervisory requests and the Supervisory Review and Evaluation Process (SREP) conclusions.
- Reviews and recommends to the Board of Directors for approval the Group's Risk Policies.

At least one Member of the Committee should be familiar with the NPE/NPL management framework, policies, practices and procedures. At least one Member (the NPL Expert) should have solid risk and capital management experience as well as familiarity with the local and the international regulatory framework.

The specific duties and responsibilities of the Risk Management Committee are set out in its Charter, which is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/commitees).

During 2020 the main activities of the Committee, among others, were the following:

The Committee:

- Endorsed and proposed to the Board of Directors the approval of:
  - the new Lending Policy for the businesses affected by the Covid-19 pandemic,
  - the updated Group Loan Impairment Policy and the new Group Loan Default Classification Policy.
- Was informed of the loans eligible for payment moratoria due to the Covid-19 pandemic and implementations thereof.
- Was updated on the ICAAP/ILAAP submission to the Single Supervisory Mechanism (SSM).
- Was updated on the SREP results and the SREP Action Plan.
- Was informed of the Group Recovery Plan Assessment by the European Central Bank (ECB).
- Was informed of the Group Resolution Plan as well as of the Single Resolution Board (SRB) Action Plan and Working Priorities.
- Was updated on the Group's activity in terms of Real Estate Owned (REO) properties.
- Reviewed the implementation of the carve-out of the Wholesale and Retail Non-Performing Loans (NPLs) to Cepal.
- Reviewed the Letters on the "Operational Capacity to Deal with Distressed Debtors in the Context of the Covid-19 Pandemic" as well as on the "Coordinated statement on operational resilience" and on the "Identification and Measurement of Credit Risk in the Context of the Covid-19 Pandemic" sent by Mr. A. Enria, Chair of the Supervisory Board of the ECB.

Regarding the Subsidiaries, the Committee reviewed:

- the 2019 Annual and the 2020 Semi-Annual Activity Reports prepared by the Risk Management Committees of the Subsidiaries.

Joint Meeting of the Audit Committee and the Risk Management Committee

Number of meetings in 2020:	9

Responsibilities:

- Oversight of certain key areas of risk and capital management and their repercussions on the Internal Control System.
- Review of issues relevant to the remediation plans related to regulatory/supervisory assessments, operational risk and other issues of importance and common interest.

During 2020 the Members of the Audit Committee and the Risk Management Committee:

- Were informed about the Bank's Data Governance Framework.
- Discussed the Single Supervisory Mechanism (SSM)'s On-Site Inspection (OSI) results regarding the IFRS 9 collective provisioning framework for SMEs. Subsequently, they endorsed the Bank's respective Action Plan and resolved to submit it to the Board of Directors for approval.
- Endorsed the Bank's response to the Letter sent by Mr. A. Enria, Chair of the Supervisory Board of the ECB on the "Operational Capacity to Deal with Distressed Debtors in the Context of the Covid-19 Pandemic" and proposed its approval by the Board of Directors.
- Endorsed the updated Write-off Policy and proposed its approval by the Board of Directors.
- Participated in a materiality analysis process, in the context of the 2020 Corporate Responsibility Report, in order to obtain an in-depth understanding of the individual areas identified by prior analyses conducted by the Management and to perform scoring on the basis of each Member's perception of the significance and maturity of the Company processes for each. The process followed the GRI (Global Reporting Initiative) guidelines.

Remuneration Committee

The Board of Directors, at its meeting held on 23.11.1995, resolved on the establishment of a Remuneration Committee for Alpha Bank. At the Board of Directors meeting held on 31.5.2012, the Committee's responsibilities were expanded to cover the Group Companies. The Members of the current Remuneration Committee of the Bank were appointed by a resolution of the Annual Ordinary General Meeting of Shareholders of 31.7.2020.

Chair:	Richard R. Gildea
Number of Members:	4
Number of meetings in 2020:	12
Average participation rate of the Members:	96% (based on the Committee's composition on 31.12.2020)

Remuneration Committee Composition

75% Non-Executive Independent Members

25% Non-Executive Members

(*Based on the composition of the Remuneration Committee on 31.12.2020*)

The main responsibilities of the Remuneration Committee include but are not limited to those presented below.

The Committee:

- Assists the Board of Directors in ensuring that the Remuneration Policies are consistent with the values, culture, business strategy, risk appetite and strategic objectives of the Bank and the Group.
- Provides its support and advice to the Non-Executive Members of the Board of Directors on the design of the Remuneration Policies for the Bank and the Group Companies according to the relevant legislative and regulatory provisions.
- Recommends to the Non-Executive Members the remuneration of the Members of the Board of Directors.
- Reviews and advises on fixed salaries, benefits and the total compensation within the Bank.
- Reviews the variable remuneration framework. Advises on variable remuneration schemes, where these are permitted, for Personnel and Executives across the Bank and the Group, and proposes the total envelope for variable remuneration across the Bank and the Group.
- Oversees the evaluation process for Senior Executives and Key Function Holders, ensuring that it is implemented adequately and in accordance with the provisions of the Bank's respective Policy.

At least one Member of the Committee should have sufficient professional experience in risk management.

The specific duties and responsibilities of the Remuneration Committee are set out in its Charter, which is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/commitees).

During 2020 the main activities of the Committee, among others, were the following:

The Committee:

- reviewed and proposed to the Board of Directors the approval of:
  - the Senior Executives Severance Payment Policy,
  - the amendment to the Savings Plan for Senior Executives of the Bank,
  - the Remuneration Policy for Alpha Bank and the other Group Companies,
  - the Benefits and Corporate Expenses Policy for Alpha Bank and the other Group Companies,
  - the Expenses Policy for the Non-Executive Members of the Board of Directors.
- endorsed, as part of the material to be submitted to the Ordinary General Meeting of Shareholders, the Remuneration Report as per Law 4548/2018.
- endorsed and recommended to the Board of Directors the approval of the Stock Options Plan Regulation.
- endorsed and recommended to the Board of Directors the approval of the 2019 Sales Incentive Program Bonus Allocation to Branch Employees as well as the 2020 Sales Incentive Program Bonus Pool Allocation.
- endorsed and recommended to the Board of Directors the approval of the 2019 Performance Incentive Program Bonus Allocation to Division Employees.
- reviewed the 2019 Performance Evaluation of the Bank's Senior Executives and Key Function Holders as well as the 2020 Evaluation Scorecards of the General Managers and of the Key Function Holders.

Regarding the Subsidiaries, the Committee reviewed:

- the Annual Activity Reports for the year 2019 of the Remuneration Committees of Subsidiaries.

- the annual remuneration amounts of the Non-Executive Members of the Boards of Directors of Subsidiaries for the year 2019.

Corporate Governance and Nominations Committee

The Board of Directors, at its meeting held on 27.6.2014, resolved on the establishment of a Corporate Governance and Nominations Committee for Alpha Bank and the Group Companies. The Members of the current Corporate Governance and Nominations Committee of the Bank were appointed by a resolution of the Annual Ordinary General Meeting of Shareholders of 31.7.2020.

Chair:	Shahzad A. Shahbaz
Number of Members:	5
Number of meetings in 2020:	11
Average participation rate of the Members:	100% (based on the Committee's composition on 31.12.2020)

Corporate Governance and Nominations Committee Composition

60% Non-Executive Independent Members

40% Non-Executive Members

(Based on the composition of the Corporate Governance and Nominations Committee on 31.12.2020)

The main responsibilities of the Corporate Governance and Nominations Committee include but are not limited to those presented below.

The Committee:

- Ensures that the corporate governance principles of the Bank and the Group, as embedded in the Corporate Governance Code of the Bank, as well as the implementation of these principles reflect the legislation in force, regulatory expectations and international corporate governance best practices.
- Regularly reviews the Corporate Governance Code of the Bank and makes appropriate recommendations to the Board of Directors on its update.
- Facilitates the regular review of the Charters of Board Committees, in consultation with the relevant Committees, by providing input to each Committee in order to ensure that the Charters remain fit-for-purpose and align with the Bank's Corporate Governance Code as well as with corporate governance best practices.
- Assists the Board of Directors in establishing the conditions required for effective succession and continuity in the Board of Directors.
- Develops and regularly reviews the selection criteria and the appointment process for the Members of the Board of Directors.
- Identifies and recommends for the approval of the Board of Directors candidates to fill vacancies, evaluates the balance of knowledge, skills, diversity and experience of the Board of Directors and prepares a description of the roles and capabilities for a particular appointment and assesses the time commitment expected.
- Assesses periodically, and at least annually, the structure, size, composition and performance of the Board of Directors and makes recommendations to the Board of Directors with regard to any changes.
- Assesses periodically, and at least annually, the knowledge, skills and experience of each Member of the Board of Directors and of the Board of Directors collectively and reports to the Board of Directors accordingly.
- Oversees the design and implementation of the induction program for the new Members of the Board of Directors as well as the ongoing knowledge and skills development for Members that support the effective discharge of their responsibilities.

The specific duties and responsibilities of the Corporate Governance and Nominations Committee are set out in its Charter, which is posted on the Bank's website (https://www.alpha.gr/en/group/corporate-governance/commitees).

During 2020 the main activities of the Committee, among others, were the following:

The Committee:

- reviewed and proposed to the Board of Directors the approval of:
  - the Corporate Governance Code,
  - the Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders,
  - the Suitability and Nomination Process for the Members of the Board of Directors,
  - the Diversity Policy,
  - the Induction and Training Policy for the Members of the Board of Directors,

  - the Corporate Governance Statement for the year 2019.
- recommended to the Board of Directors the appointment of Mr. D.C. Tsitsiragos and Ms. E.R. Hardwick.
- proposed to the Board of Directors the approval of a new structure of the Management Committees.
- proposed to the Board of Directors the appointment of Ms. A.C. Sakellariou as General Manager - Chief Transformation Officer and of Mr. S.N. Mytilinaios as General Manager - Chief Operating Officer (COO) as well as their appointment as Members of the Executive Committee.
- recommended to the Board of Directors the approval of changes to the Organizational Chart of the Bank.

Regarding the Subsidiaries, the Committee reviewed:

- the 2019 Annual and the 2020 Semi-Annual Activity Reports of the Subsidiaries' Nomination Committees and Boards of Directors.
- the composition of the Subsidiaries' Boards of Directors and their Committees.

Non-Executive Members' Meeting

Number of meetings in 2020:	4

The main responsibilities of the Non-Executive Members include but are not limited to those presented below.

- Exchanging views on any matter that they deem pertinent.
- Reviewing potential issues of conflict of interests between the Bank and the Executive Members of the Board of Directors.
- Assessing the overall performance of the Bank's executive leadership team.
- Verifying that the Board and its Committees have developed effective procedures.
- Reviewing the general principles of the Remuneration Policy periodically and monitoring its implementation.

F. MANAGEMENT COMMITTEES

1. Executive Committee

In accordance with Law 4548/2018, the Board of Directors has established as of 2.12.2019 an Executive Committee.

The Executive Committee acts as a collective corporate body of the Bank. The Committee's powers and authorities are determined by way of a CEO act, delegating powers and authorities to the Committee.

The indicative main responsibilities of the Committee include but are not limited to the following.

The Committee:

- prepares the strategy, business plan and annual Budget of the Bank and the Group for submission to and approval by the Board of Directors as well as the annual and quarterly Financial Statements,
- decides on and manages the capital allocation to the Business Units,
- prepares the Internal Capital Adequacy Assessment Process (ICAAP) Report and the Internal Liquidity Adequacy Assessment Process (ILAAP) Report,
- monitors the performance of each Business Unit and Subsidiary of the Bank against the Budget and ensures that corrective measures are taken,
- reviews and approves the policies of the Bank, informing the Board of Directors accordingly,
- approves and manages any collective program proposed by the Human Resources Division for the Personnel and ensures the adequacy of Resolution Planning governance, process and systems,
- is responsible for the implementation of the overall risk strategy, including the institution's risk appetite and its risk management framework, an adequate and effective internal governance and internal control framework, the selection and suitability assessment process for Key Function Holders, the amounts, types and distribution of both internal capital and regulatory capital and the targets for the liquidity management of the Bank.

The composition of the Executive Committee of the Bank as of 1.12.2020 is as follows:

Chair	
V.E. Psaltis	Chief Executive Officer
Members	
S.N. Filaretos	General Manager – Growth and Innovation
S.A. Andronikakis	General Manager – Chief Risk Officer
L.A. Papagaryfallou	General Manager – Chief Financial Officer
S.A. Oprescu	General Manager of International Network
N.V. Salakas	General Manager – Chief Legal and Governance Officer
I.M. Emiris	General Manager of Wholesale Banking
I.S. Passas	General Manager of Retail Banking
A.C. Sakellariou	General Manager – Chief Transformation Officer
S.N. Mytilinaios	General Manager – Chief Operating Officer

Chair

Vassilios E. Psaltis - CEO

He was born in Athens in 1968 and holds a PhD and an MBA from the University of St. Gallen in Switzerland. He has worked as Deputy (acting) Chief Financial Officer at Emporiki Bank and at ABN AMRO Bank's Financial Institutions Group in London. He joined Alpha Bank in 2007. In 2010 he was appointed Group Chief Financial Officer (CFO) and in 2012 he was appointed General Manager. Through these posts, he spearheaded capital raisings of several billions from foreign institutional shareholders, diversifying the Bank's shareholder base, as well as significant mergers and acquisitions that contributed to the consolidation of the Greek banking market, reinforcing the position of the Bank. He was voted seventh best CFO among European banks (2014 and 2018) by institutional investors and analysts in the Extel international survey. He has been a Member of the Board of Directors of the Bank since November 2018 and Chief Executive Officer since January 2019.

Member

Spyros N. Filaretos - General Manager – Growth and Innovation

He was born in Athens in 1958. He studied Economics at the University of Manchester and at the University of Sussex. He joined the Bank in 1985. He was appointed Executive General Manager in 1997 and General Manager in 2005. In October 2009 he was appointed Chief Operating Officer (COO). He has been a Member of the Board of Directors of the Bank since 2005. As of December 2020 he is General Manager – Growth and Innovation.

Member

Spiros A. Andronikakis - General Manager – Chief Risk Officer

He was born in Athens in 1960. He holds a BA in Economics and Statistics from the Athens University of Economics and Business and an MBA in Financial Management and Banking from the University of Minnesota, U.S.A. He has worked in the Corporate Banking Units of Greek and multinational banks since 1985. He joined Alpha Bank in 1998. He was Corporate Banking Manager from 2004 to 2007. In 2007 he was appointed Chief Credit Officer and in 2012 General Manager and Chief Risk Officer.

Member

Lazaros A. Papagaryfallou - General Manager – Chief Financial Officer

He was born in Athens in 1971. He studied Business Administration at the Athens University of Economics and Business and holds an MBA in Finance from the University of Wales, Cardiff Business School. He started his career in Citibank and ABN AMRO and he joined Alpha Bank in 1998, having served as Manager of the Corporate Development, International Network and Strategic Planning Divisions. On 1.7.2013 he was appointed Executive General Manager of the Bank and has contributed to the implementation of the Group's Restructuring Plan, the capital strengthening of the Bank, the design and closing of mergers, acquisitions and portfolio transactions. On 2.1.2019 he was appointed as General Manager and CFO for the Group. During his career he served as Chairman and member in the Board of Directors of various group companies, in Greece and abroad, in banking, insurance, financial services, industry and real estate sectors.

Member

Sergiu – Bogdan A. Oprescu - General Manager of International Network

He was born in 1963. He holds a MEng Graduate degree with concentration in Avionics from the Aeronautical Faculty, Politehnica University of Bucharest. He acquired a postgraduate degree in Banking from the University of Colorado and followed multiple executive program studies at Harvard Business School, Stanford and London Business School. He joined Alpha Bank Romania in 1994 and held several senior positions before he was appointed Executive President in 2007. He served as Chairman of the Bucharest Stock Exchange from 2000 to 2006 and is currently President of the Board of Directors of the Romanian Association of Banks. On 11.2.2019 he was also appointed as General Manager of International Network of the Bank.

Member

Nikolaos V. Salakas - General Manager – Chief Legal and Governance Officer

He was born in 1972. He has studied Law at the National and Kapodistrian University of Athens and holds a postgraduate degree (LL.M. in International Business Law) from the University College London. He is joining the Bank after having worked for Koutalidis Law Firm, where he was leading the Banking and Finance Department as of 2010. He has more than 20 years of experience in domestic and international Banking, Financing, Restructuring and Securities transactions and he is ranked amongst the leading Greek lawyers by the IFLR, Legal 500 and Chambers and Partners. He has supported Alpha Bank in regulatory, M&A, strategic and finance transactions since 1999. On 1.3.2019 he was appointed as General Manager – Chief Legal and Governance Officer of the Bank.

Member

Ioannis M. Emiris - General Manager of Wholesale Banking

He was born in Athens in 1963. He studied Economics and Business Administration at the Athens University of Economics and Business (former Athens School of Economics and Business) and holds an MBA from Columbia Business School as well as a US Certified Public Accounting degree. He started his career as a certified public accountant in PricewaterhouseCoopers in New York. From 1991 to 2012 he worked for the Alpha Bank Group, initially as an Investment Banker in Alpha Finance and from 2004 as Head of the Investment Banking and Project Finance Division of Alpha Bank. From 2012 to 2014, he was the Chief Executive Officer of the Hellenic Republic Asset Development Fund (HRADF). On 5.11.2014, he was appointed Executive General Manager of the Bank and on 19.11.2019 he was appointed General Manager of Wholesale Banking.

Member

Isidoros S. Passas - General Manager of Retail Banking

He was born in Thessaloniki in 1967. He holds an MSc in Mechanical Engineering from the National Technical University of Athens, an MBA from at the City University Business School and has attended the Advanced Management Program (AMP) at INSEAD. He started his career in Procter & Gamble and held Director Positions in Marketing and Sales functions of multinational consumer goods companies. In 2000, he started his banking career in Eurobank. He had been Deputy General Manager of Retail Banking Network for several years. In 2013, he worked as a Senior Advisor to the CEO for retail marketing distribution in Hellenic Petroleum. He joined Alpha Bank in 2014. He held the positions of Manager of Deposit and Investment Products and Greek Branch Network Division. He is Vice President at the Board of Directors of AlphaLife Insurance Company S.A. and holds the position of Counselor at the Board of Directors of Alpha Finance. On 4.1.2016, he was appointed Executive General Manager of the Bank and on 19.11.2019 he was appointed General Manager of Retail Banking.

Member

Anastasia Ch. Sakellariou - General Manager – Chief Transformation Officer

She was born in 1973. She holds postgraduate degrees from the University of Reading in International Banking and from the University of Warwick in International Studies. She joined the Bank with 25 years of experience in international banking. She began her career in London in the mid-90s, having worked at bulge bracket investment banking firms. In her latest international role, she was a Managing Director in investment banking at Credit Suisse. In 2009 she repatriated; she held a public sector role as the CEO of the Hellenic Financial Stability Fund at a critical time for the reshaping of the banking landscape. Before joining Alpha Bank, she was the CEO and driving force behind the creation of the first digital banking platform in Greece, Praxiabank. On 1.4.2020 she was appointed General Manager – Chief Transformation Officer.

Member

Stefanos N. Mytilinaios - General Manager – Chief Operating Officer

He was born in Athens in 1973. He holds a First Class degree in Aerospace Engineering from the University of Bristol, UK, and an MBA with Distinction from INSEAD in Fontainebleau, France. He brings onboard extensive international and Greek experience in technology, operations and business, having assumed managerial positions in Greece and abroad. He has been the Chief Technology Officer at Commercial Bank of Qatar and later on he was appointed General Manager, Digital Business at Piraeus Bank. Previously, he served as the Deputy Group CIO at Eurobank and a business consultant with McKinsey & Company, based in Athens and London. On 1.12.2020 he was appointed General Manager – Chief Operating Officer of the Bank.

2. General Manager-level Management Committees

2.1 Operational Risk and Internal Control Committee

Frequency:	At least quarterly

The Committee:

- takes cognizance of and decides upon issues related to Operational Risk and the Internal Control Framework.

2.2 Credit Risk Committee

Frequency:	Every month

The Committee:

- assesses the adequacy and efficiency of the credit risk management policy and procedures of the Bank and the Group and plans the required corrective actions.

2.3 Troubled Assets Committee

Frequency:	At least quarterly

The Committee:

- formulates, evaluates and approves the Wholesale and the Retail Banking NPE management strategy.

2.4 Assets-Liabilities Management Committee (ALCo)

Frequency:	Once a fortnight

The Committee:

- Decides on matters regarding the management of Asset-Liability and cash management issues, i.e. liquidity, hedging strategy, capital structure, proposals for new products/services or modification of existing products/services, products pricing, portfolios, etc.
- Assesses financial risks and decides on the risk hedging strategy and actions.

2.5 REO Committee I

Frequency:	Quarterly

The Committee:

- determines and monitors the strategy of acquisition, management, development and sale of Real Estate which is either under the Bank's or the Group's ownership, or is examined to be acquired by the Bank or the Group.

2.6 Cost Control Committee

Frequency:	Once a fortnight

The Committee:

- approves the cost control policies,
- validates the proposed CapEx/OpEx budget prior to its submission to the Executive Committee for approval and the formulation proposal for the projects portfolio,
- examines and approves expense requests/projects' costs within the Committees' limits,
- reviews the cost evolution versus the Budget as well as mitigation actions in case of overruns,
- evaluates proposals on cost containment initiatives,
- assesses options to promote the Bank's cost-efficient operation and
- validates cost allocation rules among the Bank's Business Units.

2.7 Credit Committee I

Frequency:	At least twice a week

The Committee:

- decides, within its delegation limits on the following:
  - Credit requests to companies or groups of connected companies, under the supervision of the General Manager of Wholesale Banking.
  - Risk issues of Credit Institutions, Central Governments, Transnational Organizations and Mediators under the responsibility of the Divisions supervised by the Executive General Manager of Treasury Management.
  - Retail Banking credit requests for new credits and periodic reviews of credit limits.
  - Credit requests of Individuals for personal/consumer and housing loans, for which an application is submitted through the Private Banking Division.
  - Credit requests of companies or groups of connected companies, with performing exposures under the management of the Private Banking Division.
  - Lending to companies or groups of connected companies of the International Network with Performing Exposures.

2.8 Arrears Committee I

Frequency:	At least once a week

The Committee:

- decides on Customers' requests under the management of the Arrears Units in Greece and in the countries where the Group operates, regarding the following portfolios:
  - Wholesale Banking – Greece,
  - Retail Banking - Greece and
  - Wholesale Banking - International Network.

G. DESCRIPTION OF THE DIVERSITY POLICY APPLIED TO THE MEMBERS OF THE BOARD OF DIRECTORS AND EMPLOYEES

The Bank has adopted the Diversity Policy that sets the principles and the approach for the achievement of diversity in both the Board of Directors and the Employees in accordance with the legislative and regulatory framework in force, including the relevant Joint ESMA and EBA Guidelines on "the assessment of the suitability of members of the management body and key function holders" as well as with European best practices in corporate governance.

The objectives of the Policy are to support and promote diversity as well as to engage a broad set of qualities and competences when recruiting Members of the Board of Directors and Employees, to achieve a variety of views and experiences and to facilitate independent opinions.

1. Board of Directors

Taking into account the existing framework, the Bank embraces the benefits of having a diverse Board of Directors. It recognizes that diversity can help achieve maximum team performance and effectiveness, enhance innovation and creativity and promote critical thinking and team cooperation within the Board. In this context, a diversified Board of Directors fosters constructive challenge and discussion on the basis of different points of view. It can help improve decision-making regarding strategies and risk-taking by encompassing a broader range of views, opinions, experience, perception, values and backgrounds. It reduces the phenomena of “group think” and “herd behavior”.

A truly diverse Board of Directors allows and makes good use of differences in skills, regional and industry experience, background, abilities, qualifications, professional training, gender and other distinctions between the Members. All Board appointments at the Bank are made on merit in the context of the skills, experience, knowledge and independence which the Board as a whole requires in order to be effective.

At least the following diversity aspects shall be taken into consideration for all Board appointments, without prejudice to the legislative and regulatory framework and to the Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders:

- **Educational and professional background, skills and knowledge as well as experience** in accordance with the Suitability and Nomination Policy for the Members of the Board of Directors and Key Function Holders.
- **Gender:** The Bank strives to enhance gender diversity in its Board of Directors and Senior Management.
- **Age:** the same applies to age, as the time period in which a person has grown up influences his or her values and risk culture.
- **Geographical provenance:** the region where a person has gained a cultural, educational or professional background. Diversity regarding geographical provenance improves the experience of the Board of Directors with regard to the business activities pursued in a business area and enables the Board of Directors to better take into account the cultural values and the legal and market specificities relevant to those areas.

Nationality of the Members of the Board of Directors

- 46% Hellenic
- 23% British
- 7.75% Belgian
- 7.75% Dutch
- 7.75% French
- 7.75% US

Educational Profiles of the Members of the Board of Directors

- 62% Business Administration/Economics
- 15% Law
- 8% Engineering
- 15% Degree in another field of study

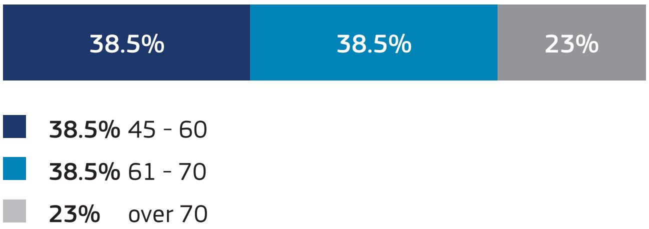
Gender Diversity

- 85% Male
- 15% Female

The Board of Directors’ actual target in relation to the female gender representation on the Board is to reach at least 30% in the next three years, while always considering industry trends and best practices. The Corporate Governance and Nominations Committee has informed the Board of Directors accordingly and has made the achievement of the said target a priority when nominating candidates.

All the candidates for the Board of Directors are assessed on the basis of the same criteria, irrespective of gender, since the eligible Members for the Board of Directors must fulfill all the conditions set in relation to their qualifications. In this context, men and women have equal opportunities to be nominated, under the condition that they fulfill all the other prerequisites. The Bank does not nominate Members to the Board of Directors with the sole purpose of increasing diversity to the detriment of the functioning and suitability of the Board of Directors collectively or at the expense of the suitability of individual Members of the Board of Directors.

Age Range



2. Employees

To the Bank, the provision of equal opportunities for employment and advancement to all its Employees is not merely a legal obligation, but also a cornerstone of its Human Resources policy. This Policy is incorporated in the Human Resources management procedures and practices and ensures the implementation thereof in every country where the Bank is present.

Seeking to implement gender equality in action and to address the issue of the low percentage of women in positions of responsibility, issues which are typical of the Greek labor market, the Bank takes a number of measures which help its Employees balance their professional and family life, while also promoting equitable treatment and merit-based Personnel advancement, with equal advancement opportunities for female Employees.

The Bank applies a uniform, gender-neutral salary policy to all categories of Personnel.

The Bank respects and defends the diversity of its Employees irrespective of gender, age, nationality, political and religious convictions or any other discrimination. Further to the above-mentioned principles, the Bank recognizes the need for diversity pertaining to skills, background, knowledge and experience in order to facilitate constructive discussion and independent thinking. It ensures top-quality work conditions and opportunities for advancement that are based on merit and equitable treatment. It offers fair remuneration, based on contracts which are in agreement with the conditions of the corresponding national labor market and ensures compliance with the respective national regulations, inter alia, on minimum pay, working hours and the granting of leave.

Further to the above, the Bank defends human rights and opposes all forms of child, forced or compulsory labor. The Bank respects employee rights and is committed to safeguarding them fully, in accordance with the national and the European Union Law and the Conventions of the International Labor Organization.

Employees in Management positions* as of 31.12.2020

Gender	Age Breakdown as of 31.12.2020				Percentage(%)
	26-40	41-50	51+	Total	
Male	30	196	161	387	63.13
Female	10	131	85	226	36.87
Total:	40	**327**	**246**	**613**	**100**
Percentage (%)	6.53	53.34	40.13	100	

Educational level	Breakdown as of 31.12.2020	Percentage(%)
Postgraduate Studies (Master's, PhD)	289	47.15
Tertiary Education (graduates of Universities or Technological Education Institutes)	174	28.38
High School (Lyceum) graduates	150	24.47
Total	**613**	**100**

* *Management positions are defined as the positions from Branch Manager and above.*

The percentage and number of Employees in managerial positions per educational level point out that Employees in managerial positions holding postgraduate degrees represent in 2020 the highest percentage, i.e. 47%.

H. REMUNERATION

1. Remuneration Policy for Alpha Bank and the Group Companies

The Remuneration Policy is consistent with the values, business strategy, objectives and, in general, the long-term interests of the Bank and the Group Companies and complies, inter alia, with the dictates of Law 4261/2014, Law 4548/2018, Bank of Greece Executive Committee Act 158/10.5.2019 and Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013.

In particular, in the context of effective risk management, the Policy discourages excessive risk taking and prevents or minimizes the emergence of conflicts of interest which are to the detriment of the proper, wise and moral management of risks. In addition to fixed remuneration, the Bank's variable remuneration framework, which is linked to Key Performance Indicators, has been created (i) to reward performance that meets or exceeds the business plan, (ii) to discourage excess risk taking across all lines of business and (iii) to lessen the risk of conflicts of interest emerging when the pursuit of short-term goals at the individual or divisional level is at variance with the long-term business objectives and financial sustainability of the Bank as a whole.

Fixed remuneration takes into account the implementation of the provisions of labor law and the collective labor agreements (at national, sectoral, bank level). In addition, in order to ensure that the Bank can attract from the market, or maintain highly skilled key Employees and Executives, it also takes into consideration market trends and dynamics. A key factor in defining the fixed remuneration is the seniority level of each position as well as an assessment of its significance. This is achieved by applying an analysis, description and evaluation of job positions across the Bank in order to establish an objective and fair Remuneration Policy.

Insofar as variable remuneration is concerned, the performance management system motivates the achievement of outstanding long-term results without encouraging excessive risk taking. More specifically, the evaluation of the performance of an Executive takes into account the achievement of the goals set, which include financial results and KPIs, operational efficiency, customer relations and people management. Variable remuneration is considered a necessary tool of Human Resources Management and is required for attracting and/or keeping key Employees and Executives at Bank and Group level, thus contributing significantly to the achievement of the long-term business objectives.

As of 2010, however, payment of any performance-related reward (bonus) to the Members of the Board of Directors, General Managers and Deputy General Managers is prohibited by the statutory provisions of the HFSF Law (Law 3864/2010).

2. Remuneration of the Non-Executive Members of the Board of Directors for the year 2020

(Amounts in Euro)

Members of the Board of Directors	Total Members' remuneration	Committees			
		Audit	Risk Management	Remuneration	Corporate Governance and Nominations
Chair (Non-Executive Member)					
Vasileios T. Rapanos	259,000.00	-	-	-	-
Non-Executive Members					
Efthimios O. Vidalis [1]	103,791.67	M	-	-	M
Non-Executive Independent Members					
Dimitris C. Tsitsiragos [2]	45,125.00	-	M	M	-
Jean L. Cheval [3]	103,791.67	-	M	M	-
Carolyn G. Dittmeier [4]	128,791.67	C	-	-	M
Richard R. Gildea	109,000.00	-	M	C	-
Elanor R. Hardwick [5]	45,125.00	M	-	-	M
Shahzad A. Shahbaz	84,000.00	-	-	-	C
Jan A. Vanhevel	134,000.00	M	C	-	-
Non-Executive Member (pursuant to the provisions of Law 3864/2010)					
Johannes Herman Frederik G. Umbgrove	109,000.00	M	M	M	M
Total	**1,121,625.00**				

C: Chair / M: Member / - : The Member does not participate in this Committee

[1] Member of the Remuneration Committee until 31.7.2020

[2] Non-Executive Member of the Board of Directors from 2.7.2020 until 31.7.2020 and Non-Executive Independent Member of the Board of Directors as of 31.7.2020
- Member of the Risk Management Committee as of 31.7.2020
- Member of the Remuneration Committee as of 31.7.2020

[3]
- Member of the Risk Management Committee as of 31.7.2020
- Member of the Audit Committee until 31.7.2020
- Member of the Corporate Governance and Nominations Committee until 31.7.2020

[4]
- Member of the Corporate Governance and Nominations Committee as of 31.7.2020
- Member of the Risk Management Committee until 31.7.2020

[5] Non-Executive Member of the Board of Directors from 2.7.2020 until 31.7.2020 and Non-Executive Independent Member of the Board of Directors as of 31.7.2020
- Member of the Audit Committee as of 31.7.2020
- Member of the Corporate Governance and Nominations Committee as of 31.7.2020

In particular, as regards the remuneration amounts, as of 1.1.2020, the following apply:

A. The remuneration of the Non-Executive Chair of the Board of Directors amounts to Euro 259,000 annually.

B. The remuneration, per beneficiary, for the Non-Executive Members of the Board of Directors, in their capacity as Members of the Board of Directors of the Bank, amounts to Euro 59,000 annually.

C. The remuneration, per beneficiary, for the Non-Executive Members of the Audit Committee of the Board of Directors of the Bank amounts to Euro 25,000 annually. The remuneration for the Chair of the Audit Committee of the Board of Directors of the Bank amounts to Euro 50,000 annually.

D. The remuneration, per beneficiary, for the Non-Executive Members of the Risk Management Committee of the Board of Directors of the Bank amounts to Euro 25,000 annually. The remuneration for the Chair of the Risk Management Committee of the Board of Directors of the Bank amounts to Euro 50,000 annually.

E. The remuneration, per beneficiary, for the Non-Executive Members of the Corporate Governance and Nominations Committee of the Board of Directors of the Bank amounts to Euro 12,500 annually. The remuneration for the Chair of the Corporate Governance and Nominations Committee of the Board of Directors of the Bank amounts to Euro 25,000 annually.

F. The remuneration, per beneficiary, for the Non-Executive Members of the Remuneration Committee of the Board of Directors of the Bank amounts to Euro 12,500 annually. The remuneration for the Chair of the Remuneration Committee of the Board of Directors of the Bank amounts to Euro 25,000 annually.

G. No Member is paid for participation in more than three Committees of the Board of Directors.

H. A Member of the Board of Directors who is at the same time a Member of the Audit Committee and of the Risk Management Committee is paid for participation in only one of these Committees. Only if the Member of the Board of Directors is the Chair in one of the above-mentioned Committees, may he/she be paid for participation in both.

I. Taking into account B. to H. above, the annual remuneration for the representative of the Hellenic Financial Stability Fund (HFSF) who is a Member of the Board of Directors and also a Member of all the Board Committees amounts to Euro 109,000.

J. The Executive Members of the Board of Directors do not receive any remuneration in their capacity as Members of the Board of Directors, as per the standard practice of the Bank.

Athens, 23 March 2021

THE CHAIRMAN OF THE BOARD OF DIRECTORS	THE CHIEF EXECUTIVE OFFICER
VASILEIOS T. RAPANOS ID No AI 666242	VASSILIOS E. PSALTIS ID No AI 666591

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TRUE TRANSLATION FROM THE ORIGINAL IN GREEK

INDEPENDENT AUDITOR'S REPORT

To the Shareholders of Alpha Bank S.A.

Report on the Audit of the Separate and Consolidated Financial Statements

Opinion

We have audited the accompanying separate and consolidated financial statements of Alpha Bank S.A. (the Bank) and its subsidiaries (the Bank and the Group), which comprise the separate and consolidated balance sheet as at 31 December 2020, and the separate and consolidated statements of income and comprehensive income, changes in equity and cash flows for the year then ended, and notes to the separate and consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the separate and consolidated financial position of Alpha Bank S.A. and its subsidiaries as at 31 December 2020 and its separate and consolidated financial performance and its separate and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs), as endorsed by the European Union.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) as these have been incorporated into Greek legislation. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements" section of our report. We have been independent of the Bank and the Group during the whole period of our appointment in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) as incorporated into Greek legislation and the ethical requirements in Greece relevant to the audit of the separate and consolidated financial statements and we have fulfilled our ethical requirements in accordance with the applicable legislation and the above mentioned Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the separate and consolidated financial statements of the current year. These matters and the assessed risks of material misstatements were addressed in the context of our audit of the separate and consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key audit matters	How our audit addressed the Key audit matters

Allowance for expected credit losses (ECL) for loans at amortized cost

Loans at amortized cost of the Bank and the Group amounted to € 34,715 million for the Bank and € 38,792 million for the Group at 31 December 2020 (€34,317 million for the Bank and € 38,788 million for the Group at 31 December 2019) and allowance for expected credit losses amounted to € 7,469 million for the Bank and € 9,080 million for the Group at 31 December 2020 (€7,070 million for the Bank and € 8,682 million for the Group at 31 December 2019).

Measurement of ECL on loans is deemed a key audit matter as the determination of assumptions used, involves critical Management judgments and accounting estimates with high level of subjectivity and complexity. Such subjectivity and complexity has increased in the current year due to uncertainty associated with COVID-19 and its consequent implications to the economy.

The most significant Management judgements and estimates, relate to:

- The criteria used for the staging assessment of loans, considering the impact of COVID-19 and relief measures, such as payment deferrals and government guarantee programs.
- Modeling assumptions and data used to build and run the models that calculate the ECL considering also the impact of COVID-19.
- Assumptions of expected future cash flows of individually assessed credit impaired exposures, including assessment approach and valuation of collaterals, particularly considering the uncertainty due to COVID-19 around the expected cash flows of the most severely impacted industries and the time to liquidate the collaterals.
- Inputs, assumptions and weightings used to estimate the impact of multiple economic scenarios, especially when considering impact of COVID-19.
- Appropriateness, identification and valuation of post model adjustments raised by Management to address known impairment model limitations as well as risks not captured by the models. These adjustments are inherently uncertain and significant management judgment is involved, especially in relation to economic uncertainty as a result of COVID-19.

Based on our risk assessment and following a risk-based approach, we have evaluated the impairment methodologies applied and assumptions made by Management in relation to this key audit matter, and we performed, inter alia, the following audit procedures:

- With the support of our financial risk modeling specialists where appropriate, we assessed the design and implementation of relevant internal controls over the ECL estimate included the controls around:
  - assumptions used in the ECL models
  - model monitoring and model validation
  - governance and approval of post model adjustments
  - allocation of loans into stages
  - selection and implementation of macro-economic variables and the controls over the selection of macro-economic scenarios and probability weightings.

- We assessed the design and tested the operating effectiveness of relevant controls over the ECL measurement of credit impaired loans assessed on an individual basis, including controls around the determination of the appropriate approach, the valuation of collaterals and the estimation of the expected future cash flows.

- We involved our financial risk modelling specialists in:
  - evaluating the appropriateness of the Group's IFRS9 impairment methodologies
  - inspecting model code and reperforming the calculation of certain components of the ECL models (including the stage allocation)
  - evaluating Management's design of models and the appropriateness of assumptions and parameters used in the models (i.e. Exposure at Default – EAD. Probability of Default – PD, Probability of Forbearance – PF, Loss Given Default- LGD), especially for new models developed in the year.
  - evaluating the criteria used to allocate loans to stages in accordance with IFRS9. This included an evaluation of the ability of the models to appropriately reflect the impact of COVID-19 on certain model assumptions, as well as the criteria set by management for determining whether there had been a Significant Increase in Credit Risk (SICR) or an Unlikeness to Pay (UTP).

Key audit matters	How our audit addressed the Key audit matters
Allowance for expected credit losses (ECL) for loans at amortized cost – *(continued)*	
Management has provided further information about principles and accounting policies for determining the ECL on loans and management of credit risk in Notes 1.2.12, 11, 19 and 40.3 to the separate and Notes 1.2.13, 11, 19 and 43.3 to the consolidated financial statements.	- assessing the reasonableness and appropriateness of the macroeconomic variables, scenarios and weightings used in the models by comparing them to macroeconomic variables included in a variety of external market sources. We also assessed how management has incorporated the impact of COVID-19 into the macroeconomic scenarios. We obtained and substantively tested evidence of timely identification of exposures with significant increase in credit risk and timely identification of credit impaired exposures. For debtors granted relief measures we performed test of details on a sample basis to assess the appropriateness of the eligibility criteria and staging. We performed substantive procedures to test the accuracy and completeness of critical data used in the ECL models by agreeing a sample of ECL calculation data points to source systems or documentation, including balance sheet data used to run the models. On a sample basis we assessed whether the approach used in the measurement of impairment for the individually assessed credit impaired exposures is appropriate, and we tested the reasonableness of significant assumptions used, including valuation of collaterals (where we also made use of our real estate specialists), time to liquidate collaterals, and estimation of the discounted future cash flows where we also assessed the incorporation of the impact of COVID-19. We assessed the appropriateness of post model adjustments, including those which were applied as a result of COVID-19 and as a result of the expected sale of certain loan portfolios, by considering the data, judgements, methodologies and governance of these adjustments. Given the complexity and granularity of the related disclosures, we assessed their completeness and accuracy in accordance with the provisions of the relevant accounting standards and regulatory expectations of COVID-19 specific disclosures.

Key audit matters	How our audit addressed the Key audit matters
Recoverability of Deferred Tax Asset (DTA)	
The Bank and the Group have recognized a deferred tax asset of € 5,277 million and € 5,293 million respectively as at 31 December 2020 compared to € 5,233 million and € 5,174 million respectively as at 31 December 2019. The recognition and measurement of the deferred tax asset is considered a key audit matter as it is involves a high degree of judgment and significant accounting estimates to be made by Management regarding the ability to generate sufficient future taxable profits. The most significant judgements and estimates used by Management regarding future profit forecasts and recoverability of deferred tax assets include: - Revenue and Cost forecasts for the preparation of the annual budget and the 3 year business plan taking into account the impact of the Group's strategic plan. - Macroeconomic assumptions and management projections used to extend the period covered under the business plan to the time when the deferred tax assets can be utilized for tax purposes. - Conversion of accounting profits to taxable profits. Management has provided further information about the deferred tax asset in Notes 1.2.15, 13 and 25 to the separate and Notes 1.2.16, 13 and 25 to the consolidated financial statements.	Based on our risk assessment, we evaluated the method used to determine the amount of deferred tax asset recognized and examined the budgets and assumptions prepared by Management relating to the future taxable profits. Our examination included the following elements where we also made use of our tax specialists: • Assessed the design and implementation of the relevant internal controls over the preparation and approval of budgets and forecasts, including the internal controls over the significant assumptions, inputs, calculation and methodologies used for this purpose. • We compared significant assumptions used by management in the DTA exercise with the approved budget and the three year business plan for consistency and assessed their reasonability by evaluating the underlying business strategies. • We compared previous management forecasts to actual results, to evaluate the reasonableness of the forecasting process. • We assessed whether assumptions used beyond the business plan period were reasonable. • With the support of our tax specialists we assessed the appropriateness of the adjustments made by Management to convert accounting profits into tax profits. We evaluated the adequacy of the disclosures in the financial statements including the appropriateness of the assumptions disclosed.

Key audit matters	How our audit addressed the Key audit matters
Information Technology General Controls and controls over financial reporting	
The Bank's and the Group's financial reporting processes are highly dependent on Information Technology ("IT") systems supporting automated accounting and reconciliation procedures, thus leading to a complex IT environment, pervasive in nature and in which a significant number of transactions are processed daily, across numerous locations. This is a key audit matter since it is important that controls over access security, cyber risks, system change control and datacenter and network operations, are designed and operate effectively to ensure complete and accurate financial records and information. Management has provided further information about General Information Technology Controls under the header "Internal Control System" in Section C of the Corporate Governance Statement for the year 2020.	Based on our risk assessment, we have tested the design and operating effectiveness of General Information Technology Controls (GITCs) relevant for financial reporting. Our assessment included the evaluation of user access over applications, operating systems and databases, the process followed over changes made to information systems, as well as the evaluation of datacenter and network IT operations. In summary, our key audit activities included, among others, testing of: • User access provisioning and de-provisioning process. • Privileged access to applications, operating systems and databases. • Periodic review of user access rights. • Change management process over applications, operating systems and databases (i.e. user request, user acceptance testing and final approval for promotion to production). • Datacenter and network operations.
Parent Company accounting for Group reorganization and carve out of operations	
The Bank in line with its Strategic Plan, carved-out and sold its Non-Performing Loans unit to its subsidiary CEPAL Hellas S.A. Further to that, the Bank in 2020 completed the reorganization of the Group and transferred certain subsidiaries to three intermediate parent companies grouping them based on common business areas. These transactions were considered complex in terms of accounting and involved significant management judgements and estimates with the result that these were considered a key audit matter. The most significant judgments and estimates made by management were: • the assumptions used in the fair valuation of the subsidiaries transferred • the judgments made in relation to the accounting recognition of the result from the transfer of the subsidiaries and the sale of the of the NPL servicing unit. Management has provided further information about the aforementioned transactions in Notes 21, 32, 44 and 48 to the separate financial statements.	Based on our risk assessment our procedures involved the following: • We assessed the design and implementation of controls around the review and approval of these transactions, as well as the determination of the appropriate accounting treatment. • With the assistance of our fair value experts, we assessed the reasonableness of management's methodology and assumptions in the determination of the fair values of the subsidiaries transferred. • We reviewed relevant documentation to assess the substance and related accounting recognition of the transactions. We evaluated whether the disclosures include significant judgements and estimates and assessed their adequacy against the relevant accounting standards.

Other Information

Management is responsible for the other information. The other information, included in the Annual Report prepared in accordance with Law 3556/2007, comprises the Board of Directors' Annual Management Report, referred to in the section "Report on Other Legal and Regulatory Requirements", the Statement by the Members of the Board of Directors, the Explanatory Report of the Board of Directors and the Corporate Governance Statement but does not include the separate and consolidated financial statements and our auditor's report thereon.

Our opinion on the separate and consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the separate and consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the separate and consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement in this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the separate and consolidated financial statements

Management is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with IFRSs, as endorsed by the European Union, and for such internal control as Management determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, Management is responsible for assessing the Bank's and the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless Management either intends to liquidate the Bank and the Group or to cease operations, or has no realistic alternative but to do so.

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

Deloitte.

Auditor's Responsibilities for the audit of the separate and consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs, as these have been incorporated into Greek legislation, will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate and consolidated financial statements.

As part of an audit in accordance with ISAs, as these have been incorporated into Greek legislation, we exercise professional judgment and maintain professional scepticism throughout the audit.
We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's and Group's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by Management.

- Conclude on the appropriateness of Management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's and Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate and consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank and the Group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the separate and consolidated financial statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the separate and consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate and consolidated financial statements of the current year and are therefore the key audit matters.

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Report on Other Legal and Regulatory Requirements

1) Board of Directors' Annual Management Report

Taking into consideration that Management is responsible for the preparation of the Board of Directors' Annual Management report which also includes the Corporate Governance Statement, according to the provisions of paragraph 5 of article 2 of Law 4336/2015 (part B) we note the following:

a) The Board of Directors' Annual Management report includes the Corporate Governance Statement which provides the information required by article 152 of Law 4548/2018.
b) In our opinion, the Board of Directors' Annual Management report has been prepared in accordance with the applicable legal requirements of articles 150 - 151 and 153 - 154 and paragraph 1 (cases c and d) of article 152 of Law 4548/2018 and its content is consistent with the accompanying consolidated financial statements for the year ended 31 December 2020.
c) Based on the knowledge we obtained during our audit of the Bank and the Group and its environment, we have not identified any material inconsistencies in the Board of Directors' Annual Management Report.

2) Additional Report to the Audit Committee

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

3) Non-audit Services

We have not provided to the Bank and the Group any prohibited non-audit services referred to in Article 5 of EU Regulation 537/2014.

The allowable non-audit services provided to the Bank and the Group by Deloitte Certified Public Accountants S.A., which is a member firm of Deloitte Touche Tohmatsu Limited ("DTTL"), during the year ended 31 December 2020 are disclosed in Note 43 and 46 to the separate and consolidated financial statements respectively. In addition, allowable non-audit services amounting to € 0.28 million and € 0.46 million have been provided to the Bank and the Group respectively by other member firms of DTTL and their respective affiliates.

4) Appointment

We were first appointed as statutory auditors by the general assembly of the shareholders of Alpha Bank S.A. on 30 June 2017. The year ended 31 December 2020 is the fourth consecutive year that we serve as statutory auditors.

Athens, 23 March 2021

The Certified Public Accountant

Alexandra V. Kostara
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Group Financial Statements as at 31.12.2020

ALPHA BANK

Consolidated Income Statement

(Amounts in thousands of Euro)

	Note	From 1 January to 31.12.2020	31.12.2019*
Interest and similar income		2,073,382	2,109,035
Interest expense and similar charges		(531,745)	(561,767)
Net interest income	2	1,541,637	1,547,268
Fee and commission income		388,688	432,022
Commission expense		(53,361)	(91,893)
Net fee and commission income	3	335,327	340,129
Dividend income	4	2,958	1,072
Gains less losses on derecognition of financial assets measured at amortised cost	6	173,202	(16,054)
Gains less losses on financial transactions	5	516,771	425,652
Other income	7	22,496	35,851
Total other income		715,427	446,521
Total income		**2,592,391**	**2,333,918**
Staff costs	8	(459,519)	(459,938)
Expenses for separation schemes	8	(26,214)	(49,615)
General administrative expenses	9	(471,729)	(474,645)
Depreciation and amortization	22, 23, 24	(161,397)	(144,532)
Other expenses	10	(38,939)	(45,946)
Total expenses before impairment losses and provisions to cover credit risk		**(1,157,798)**	**(1,174,675)**
Impairment losses and provisions to cover credit risk	11,12	(1,319,511)	(990,415)
Share of profit/(loss) of associates and joint ventures	21	(1,014)	(12,603)
Profit/(loss) before income tax		**114,068**	**156,225**
Income tax	13	(10,123)	(50,814)
Profit/(loss) for the year		**103,945**	**105,411**
Profit/(loss) attributable to:			
Equity holders of the Bank		**103,737**	**105,296**
Non-controlling interests		208	115
Earnings/(losses) per share			
Basic (€ per share)	14	0.0672	0.0682
Diluted (€ per share)	14	0.0672	0.0682

* Certain figures of the previous year have been restated as described in note 50

The attached notes (pages 95-352) form an integral part of these consolidated financial statements

Consolidated Statement of Comprehensive Income

(Amounts in thousands of Euro)

		From 1 January to	
	Note	31.12.2020	31.12.2019*
Profit/(loss) for the year, recognized in the Income Statement		**103,945**	**105,411**
Other comprehensive income			
Items that may be reclassified subsequently to the Income Statement			
Net change in reserve of investment securities' measured at fair value through other comprehensive income		(363,946)	523,929
Net change in cash flow hedge reserve		20,841	(130,463)
Foreign currency translation net of investment hedges of foreign operations		(2,951)	(1,486)
Income tax	13	95,551	(114,779)
Items that may be reclassified to the Income Statement		**(250,505)**	**277,201**
Items that will not be reclassified to the Income Statement			
Premeasurement of defined benefit liability/(asset)	31	(2,814)	(11,325)
Gains/(losses) from investments in equity securities measured at fair value through other comprehensive income		3,619	(20,355)
Income tax	13	686	9,437
Items that will not be reclassified to the Income Statement		**1,491**	**(22,243)**
Other comprehensive income, after income tax		(249,014)	254,958
Total comprehensive income for the year		**(145,069)**	**360,369**
Total comprehensive income for the year attributable to:			
Equity holders of the Bank		(145,267)	360,261
Non controlling interests		198	108

* Certain figures of the previous year have been restated as described in note 50.

The attached notes (pages 95-352) form an integral part of these consolidated financial statements

Consolidated Balance Sheet

(Amounts in thousands of Euro)

	Note	31.12.2020	31.12.2019*
ASSETS			
Cash and balances with central banks	15	7,467,316	2,028,335
Due from banks	16	2,741,547	3,332,690
Trading securities	17	30,014	18,751
Derivative financial assets	18	1,267,083	1,009,193
Loans and advances to customers	19	39,380,002	39,266,269
Investment securities	20		
- Measured at fair value through other comprehensive income	20a	6,577,698	7,519,930
- Measured at amortized cost	20c	3,335,733	1,070,730
- Measured at fair value through profit or loss	20b	137,675	93,110
Investments in associates and joint ventures	21	30,716	13,385
Investment property	22	569,876	485,836
Property, plant and equipment	23	796,331	852,332
Goodwill and other intangible assets	24	601,818	492,346
Deferred tax assets	25	5,292,612	5,174,297
Other assets	26	1,587,943	1,536,898
		69,816,364	**62,894,102**
Assets classified as held for sale	48	240,343	563,519
Total Assets		**70,056,707**	**63,457,621**
LIABILITIES			
Due to banks	27	13,106,681	10,261,283
Derivative financial liabilities	18	1,768,357	1,446,915
Due to customers	28	43,830,940	40,364,284
Debt securities in issue and other borrowed funds	29	1,222,869	1,088,693
Liabilities for current income tax and other taxes	30	70,141	39,873
Deferred tax liabilities	25	34,679	31,865
Employee defined benefit obligations	31	94,386	90,932
Other liabilities	32	891,580	1,057,844
Provisions	33	703,630	599,541
		61,723,263	**54,981,230**
Liabilities related to assets classified as held for sale	48	251	801
Total Liabilities		**61,723,514**	**54,982,031**
EQUITY			
Equity attributable to holders of the Bank			
Share capital	34	463,110	463,110
Share premium	35	10,801,029	10,801,029
Reserves	36	492,791	739,676
Amounts directly recognized in equity and associated with assets classified as held for sale			(122)
Retained earnings	37	(3.467.818)	(3,572,126)
		8,289,112	**8,431,567**
Non-controlling interests		29,382	28,951
Hybrid securities	38	14,699	15,072
Total Equity		**8,333,193**	**8,475,590**
Total Liabilities and Equity		**70,056,707**	**63,457,621**

* Certain figures of the previous year have been restated as described in note 50.

The attached notes (pages 95-352) form an integral part of these consolidated financial statements

Consolidated Statement of Changes in Equity

(Amounts in thousands of Euro)

	Note	Share capital	Share premium	Reserves	Amounts recognized directly in Equity related to assets held for sale	Retained earnings*	Total	Non-controlling interests	Hybrid securities	Total
Balance 1.1.2019		**463,110**	**10,801,029**	**460,025**	**(122)**	**(3,652,777)**	**8,071,265**	**28,814**	**15,107**	**8,115,186**
Changes for the year 1.1 - 31.12.2019										
Profit/(loss) for the year, after income tax						105,296	**105,296**	115		**105,411**
Other comprehensive income for the year, after income tax				277,208		(22,243)	**254,965**	(7)		**254,958**
Total comprehensive income for the year		**-**	**-**	**277,208**	**-**	**83,053**	**360,261**	**108**	**-**	**360,369**
Acquisitions/ Disposals/Share capital increase and other changes of ownership interests in subsidiaries							-	29		**29**
Appropriation of reserves				2,443		(2,443)	-			
(Purchases), (redemption)/sales of hybrid securities, after income tax									(35)	**(35)**
Other						41	41			41
Balance 31.12.2019		**463,110**	**10,801,029**	**739,676**	**(122)**	**(3,572,126)**	**8,431,567**	**28,951**	**15,072**	**8,475,590**

* Certain figures of the previous year have been restated as described in note 50.

The attached notes (pages 95-352) form an integral part of these consolidated financial statements

(Amounts in thousands of Euro)

	Note	Share capital	Share premium	Reserves	Amounts recognized directly in Equity related to assets held for sale	Retained earnings	Total	Non-controlling interests	Hybrid securities	Total
Balance 1.1.2020		463,110	10,801,029	739,676	(122)	(3,572,126)	8,431,567	28,951	15,072	8,475,590
Changes for the year 1.1 - 31.12.2020										
Profit/(loss) for the year, after income tax						103,737	103,737	208		103,945
Other comprehensive income for the year, after income tax				(250,495)		1,491	(249,004)	(10)		(249,014)
Transfer of reserves related to the valuation of shares measured at fair value through other comprehensive income				(122)	122		-			-
Total comprehensive income for the year		-	-	(250,617)	122	105,228	(145,267)	198	-	(145,069)
Acquisitions, Disposals, Share capital increase and other changes of ownership interests in subsidiaries							-	223		223
Valuation reserve of employee stock option program	8			1,667			1,667			1,667
Appropriation of reserves				2,067		(2,067)	-	10		10
(Purchases), (redemption)/sales of hybrid securities, after income tax							-		(373)	(373)
Expenses for share capital increase						74	74			74
Other				(2)		1,073	1,071			1,071
Balance 31.12.2020		463,110	10,801,029	492,791	-	(3,467,818)	8,289,112	29,382	14,699	8,333,193

The attached notes (pages 95-352) form an integral part of these consolidated financial statements

Consolidated Statement of Cash Flows

(Amounts in thousands of Euro)

		From 1 January to	
	Note	31.12.2020	**31.12.2019***
Cash flows from operating activities			
Profit/(loss) before income tax		114,068	156,225
Adjustments of profit/(loss) before income tax for:			
Depreciation, impairment, write-offs and net result from disposal of property, plant and equipment		105,708	98,646
Amortization, impairment, write-offs of intangible assets		74,333	63,068
Impairment losses on financial assets and other provisions		1,386,448	1,106,872
Gains less losses on derecognition of financial assets measured at amortised cost		(173,202)	16,054
Fair value (gains)/losses on financial assets measured at fair value through profit or loss		90,590	25,247
(Gains)/losses from investing activities		(722,133)	(563,060)
(Gains)/losses from financing activities		49,415	39,860
Share of (profit)/loss of associates and joint ventures		1,014	12,603
		926,241	**955,515**
Net (increase)/decrease in assets relating to operating activities:			
Due from banks		(259,266)	182,394
Trading securities and derivative financial instruments		(957)	(91,485)
Loans and advances to customers		(1,532,877)	(459,334)
Other assets		310,269	(115,621)
Net increase/(decrease) in liabilities relating to operating activities:			
Due to banks		2,845,398	(195,077)
Due to customers		3,466,656	1,627,638
Other liabilities		(146,215)	(123,486)
Net cash flows from operating activities before income tax		**5,609,249**	**1,780,544**
Income tax paid		(2,313)	(27,743)
Net cash flows from operating activities		**5,606,936**	**1,752,801**
Cash flows from investing activities			
Acquisition of a subsidiary		(41,967)	
Investments in associates and joint ventures		(15,978)	(2,794)
Proceeds from disposals of subsidiaries		15,403	118,186
Dividends received		2,958	1,072
Acquisitions of investment property, property, plant and equipment and intangible assets	22, 23, 24	(159,681)	(244,770)
Disposals of investment property, property, plant and equipment and intangible assets		6,695	54,029
Interest received from investment securities		209,046	169,076
Purchases of Greek Government Treasury Bills		(1,111,102)	(464,596)
Proceeds from disposal and redemption of Greek Government Treasury Bills		615,629	1,061,524
Purchases of investment securities (excluding Greek Government Treasury Bills)		(6,827,505)	(6,436,552)
Disposals/maturities of investment securities (excluding Greek Government Treasury Bills)		6,235,740	5,064,161
Net cash flows from investing activities		**(1,070,762)**	**(680,664)**
Cash flows from financing activities			
Issuance of debt securities in issue and other borrowed funds		495,363	416,906
Interest paid on debt securities in issue and other borrowed funds		(391,666)	(281,492)
Repayments of debt securities in issue and other borrowed funds		(17,367)	(24,620)
Finance lease payments		(42,765)	(39,746)
Net cash flows from financing activities		**43,565**	**71,048**
Effect of foreign exchange changes on cash and cash equivalents		8,833	11,999
Net increase/(decrease) in cash flows		**4,588,572**	**1,155,184**
Cash and cash equivalents at the beginning of the year		3,402,328	2,247,144
Cash and cash equivalents at the end of the year		**7,990,900**	**3,402,328**

* Certain figures of the previous year have been restated as described in note 50.

The attached notes (pages 95-352) form an integral part of these consolidated financial statements

Notes to the Financial Statements

GENERAL INFORMATION

The Alpha Bank Group (hereinafter the "Group"), which includes companies in Greece and abroad, offers the following services: corporate and retail banking, financial services, investment banking and brokerage services, real estate management, hotel services.

The parent company of the Group is Alpha Bank S.A. (hereinafter the "Bank") which operates under the name of Alpha Bank S.A. and the brand name Alpha Bank. The Bank's registered office is 40 Stadiou Street, Athens and is listed in the General Commercial Register with registration number 223701000 (ex societe anonyme registration number 6066/06/B/86/05). The Bank's duration is until 2100 but may be extended by the General Meeting of Shareholders.

In accordance with article 4 of the Articles of Incorporation, the Bank's objective is to engage, on its own account or on behalf of third parties, in Greece and abroad, independently or collectively, including joint ventures with third parties, in any and all (main and secondary) operations, activities, transactions and services allowed to credit institutions, in conformity with whatever rules and regulations (domestic, community, foreign) may be in force each time. In order to serve this objective, the Bank may perform any kind of action, operation or transaction which, directly or indirectly, is pertinent, complementary or auxiliary to the purposes mentioned above.

The Bank is managed by the Board of Directors, which represents the Bank and has the authority to take actions relating to the Bank's management, the management of its assets and the pursuit of its purpose. The tenure of the Board of Directors which was elected by the Ordinary General Meeting of Shareholders on 29.6.2018 expires with the Ordinary General Meeting of Shareholders that will take place in 2022.

The Board of Directors as at December 31, 2020, consisted of:

CHAIRMAN (Non Executive Member)

Vasileios T. Rapanos

EXECUTIVE MEMBERS

Vassilios E. Psaltis, Chief Executive Officer (CEO)
Spyros N. Filaretos, General Manager - Growth and Innovation Officer

NON-EXECUTIVE MEMBER

Efthimios O. Vidalis */****
Artemios Ch.Theodoridis

NON-EXECUTIVE INDEPENDENT MEMBERS

Dimitris K. Tsitsiragkos **/***
Jean L. Cheval **/***
Carolyn Adele G. Dittmeier */****
Richard R. Gildea **/***
Elanor R.Hardwick */****
Shahzad A. Shahbaz ****
Jan Oscar A. Vanhevel */***

NON-EXECUTIVE MEMBER (in accordance with the requirements of Law 3864/2010)

Johannes Herman Frederik G. Umbgrove */**/***/****

SECRETARY

George P. Triantafyllides

The Board of Directors may set up the Executive Committee in order to delegate certain powers and responsibilities. The Executive Committee (the "Committee") acts as the collective corporate body of the Bank. The powers and responsibilities of the Committee are set out in an Act of the Chief Executive Officer, which delegates powers and responsibilities to the Committee. Indicatively, the Committee's main responsibilities include, but are not limited to, the involvement in the

* Member of the Audit Committee
** Member of the Remuneration Committee
*** Member of the Risk Management Committee
**** Member of Corporate Governance and Nominations Committee

preparation of the strategy, business plan and annual budget of the Bank and the Group in order to be submitted to the Board of Directors for approval, as well as the preparation of the annual and interim financial statements, management of the funding allocation to the Business Units including decision making, the preparation of the Reports for the Internal Capital Adequacy Assessment Process (ICAAP) and the Internal Liquidity Adequacy Assessment Process (ILAAP), the review and approval of the Bank's policies, approval and management of any employee schemes proposed by the Human Resources Department and ensuring the effectiveness of corporate governance, processes and systems related to Recovery Plan. Furthermore, the Committee is responsible for the implementation of the overall risk strategy – including risk appetite and the Bank's risk management framework- of a robust and effective corporate governance and internal control framework, for the selection process and for the evaluation of the key management personnel, for the distribution of both internal and regulatory funds, as well as for the determination of the amount and type and for the achievement of the Bank's liquidity management objectives.

The composition of the Executive Committee at 31.12.2020 was:

CHAIRMAN

Vassilios E. Psaltis, Chief Executive Officer

EXECUTIVE MEMBERS

Spyros N. Filaretos, General Manager - Growth and Innovation Officer
Spyridon A. Andronikakis, General Manager - Chief Risk Officer (CRO)
Lazaros A. Papagaryfallou, General Manager - Chief Financial Officer (CFO)
Sergiu-Bogdan A. Oprescu - General Manager of International Network
Nikolaos V. Salakas, General Manager - Chief Legal and Governance Officer
Ioannis M. Emiris, General Manager Wholesale Banking
Isidoros S. Passas, General Manager Retail Banking
Anastasia Ch. Sakellariou, General Manager - Chief Transformation Officer
Stefanos N. Mytilineos, General Manager - Chief Operating Officer (COO)

The Bank's share are listed in the Athens Exchange since 1925 and included among the companies with the higher market capitalization. Additionally, the Bank's share is included in a series of international indices, such as the FTSE All World, the FTSE4 Good Emerging Index and MSCI Small Cap Index. Apart from the Greek Listing, the shares of the Bank are traded over at the counter market (OTC) in New York stock exchange as American Depository Receipts (ADR's).

Total ordinary shares in issue as at 31 December 2020 were 1,543,699,381. An amount of 1,374,525,214 ordinary shares of the Bank are traded in the Athens Stock Exchange, while the Hellenic Financial Stability Fund ("HFSF") holds the remaining 169,174,167 ordinary voting shares or a percentage of 10.96% of the total ordinary shares issued by the Bank. The exercise of the voting rights for the shares of HFSF is subject to restrictions according to the article 7a of Law 3864/2010.

During the year of 2020, the average volume of shares trade stood at € 6.535.

The credit rating of the Bank has been assessed by four international credit rating agencies is as follows:

• Moody's: Caa1

• Fitch Ratings: CCC+

• Standard & Poor's: B

• Capital Intelligence: B+

These annual consolidated financial statements of the Group have been approved by the Board of Directors on 23 March, 2021.

ACCOUNTING POLICIES APPLIED

1.1 Basis of presentation

The financial statements for the current period ending at 31.12.2020 have been prepared in accordance with International Financial Reporting Standards (IFRS), as adopted by the European Union, in accordance with Regulation 1606/2002 of the European Parliament and the Council of the European Union on 19 July 2002.

The accounting policies applied by the Group in preparing the financial statements are the same as those stated in the published financial statements for the year ended on 31.12.2019, after taking into account the amendments to standards which were issued by the International Accounting Standards Board (IASB), adopted by the European Union and applied on 1.1.2020, regarding which further analysis is provided in note 1.1.2.

The financial statements have been prepared on the historical cost basis. However, some assets and liabilities are measured at fair value. Those assets are the following:

- Securities held for trading
- Derivative financial instruments
- Loans and advances to customers measured at fair value through profit or loss
- Investment securities measured at fair value through other comprehensive income
- Investment securities measured at fair value through profit or loss
- The contingent consideration recognized either as a result of a business combination in which the Group is the acquirer or in the context of asset disposal transactions in which the Group is the seller.

The financial statements are presented in Euro, rounded to the nearest thousand, unless otherwise indicated.

1.1.1 Going concern

The financial statements as at 31.12.2020 have been prepared based on the going concern principle. For the application of this principle, the Board of Directors took into account current economic developments and made estimates for the formation, in the near future, of the economic environment in which it operates. In this context, the Board of Directors assessed the following areas which are considered important during its assessment:

Developments in the macroeconomic environment

In 2020, the emergence and rapid spread of the Covid-19 pandemic overturned the growth prospects of the global economy, exacerbated the uncertainty of economic developments and worsened labor market conditions. Many governments, in an effort to boost the resilience of their national economies, have been forced to take emergency fiscal measures to support national health systems and ensure employment and entrepreneurship. During the first wave of the pandemic, in March and April, Greece, which is the main country where the Group operates, managed to curb the exponential spread of infections, due to the timely introduction of restrictive measures. Following the gradual easing of the first lockdown from May onwards, economic activity gradually returned to normal in the third quarter of 2020, which was reflected in real GDP growth of 2.3% on a quarterly basis. However, Greece recorded milder growth on a quarterly basis, compared to the Eurozone, as the low performance of tourism-related activities in the third quarter negatively affected growth dynamics. The recovery of economic activity in the summer months was interrupted by the resurgence of the Covid-19 pandemic in the fall, with the result that the recovery in 2021 due to the second wave of the pandemic is expected to be milder than original forecast. The European Commission (Economic Forecasts, Autumn 2020) forecasts a sharp decline in real GDP in 2020 (-9%) and an incomplete recovery in 2021 (5%). Similarly, the latest IMF forecasts, which are included in its latest report (Report on Greece No. 20/308, November 2020) predict a large decline in real GDP in 2020 (-9.5%) and a partial recovery in 2021 (5.7%). The forecasts of the Ministry of Finance, included in the State Budget 2021, predict a recession of 10.5% in 2020 and a slight recovery in 2021 by 4.8%.

It is noted that the Covid-19 pandemic continues to create uncertainty while in the coming period its financial impact is expected to lead to a deterioration in the creditworthiness of individuals and corporates. To date, these effects have been mitigated by banking industry repayment deferrals and government incentives.

The significant fiscal support of the Greek government is estimated to partially offset the negative consequences of the recession. In particular, according to the estimates of the State Budget of 2021, the recession in 2020 could reach 17.5% (support measures for 7.0% of GDP) without fiscal interventions. In addition, of the 4.8% growth rate projected for 2021, 2.5% is attributed to the extension of fiscal support measures and the remaining 2.1% is attributed to the European Union Recovery and Sustainability Fund (RRF). On the other hand, the progress made in the development and distribution of effective vaccines will improve the outlook and strengthen the climate of trust, leading to a virtuous cycle from 2021.

In this context, the key factors that are expected to determine the course of economic activity in 2021 are: First, the extent to which vaccination programs will free up travel and boost private consumption, and second, the activation of the EU Recovery Plan -27 ("Next Generation EU", NGEU).

The prospect of access to the funds of the European Recovery and Resilience Facility (RRF), from the second half of 2021, can significantly enhance the growth potential of the country. The investments that are expected to be made will be mainly focused on green and digital development. In total, during the period 2021-2026, the Greek economy is expected to benefit with Euro 32 billion, of which Euro 19.3 billion relate to grants and Euro 12.7 billion relate to loans on favorable terms. Especially for 2021, Euro 2.6 billion are expected to be raised from the Recovery and Sustainability Mechanism in the form of grants and Euro 1.6 billion from the React-EU initiative, as well as Euro 1.3 billion with the form of loans.

Liquidity

Regarding the liquidity levels of the Group, it is noted that there was no adverse change due to Covid-19 in terms of the ability to draw liquidity from the Eurosystem Mechanisms and from repos interbank transactions. In addition, the Group made use of the TLTRO III program of the European Central Bank and ensured long-term liquidity with negative interest rates. In this context, the total financing from the European Central Bank on 31.12.2020 amounts to € 11.9 billion (note 27). In addition, it is important that the European Central Bank, in its decisions in March, April and December 2020, accepted the securities of the Hellenic Republic as collateral for liquidity operations. It is noted that the available amount of eligible collaterals through which the drawing of liquidity from the Eurosystem Mechanisms and / or from third sources is ensured, to the extent required, amounts to € 7.9 billion. In addition to the financing from the European Central Bank, the Bank has no liabilities from bond maturities in 2021 and the net amount of repo / reverse repo transactions with other banks as counterparty is very low which means that there is no dependence on a specific counterparty. Also, the Bank completed within the first quarter of 2020 the issuance of a ten-year Tier 2 bond, callable in 5 years, amounting to € 500 million, the interest rate of which rose to 4.25%, gathering high demand. Within 2021, to the extent permitted by the conditions in capital markets, the Bank plans to issue bonds, senior and subordinated. In this context, in order to strengthen its capital, the Bank issued on 4.3.2021 a new Tier 2 bond, amounting to € 500 million, with a 10.25-year maturity callable anytime between year 5 and year 5.25 and with a coupon of 5.5%. In addition, in 2020 there was an increase in private sector deposits of € 4 billion. As a result of the above, the liquidity ratios (liquidity coverage ratio and net stable funding ratio) exceed the supervisory limits that have been set while it is noted that they have been improved compared to last year. Finally, taking into account the situation of the Greek economy and the new conditions due to the pandemic of Covid-19, stress test exercises are carried out regularly for liquidity purposes, in order to assess possible outflows (contractual or potential). The result of the exercises shows that the Group has sufficient liquidity reserves to meet its needs.

Capital Adequacy

On 31.12.2020, the Common Equity Tier I was 17.3% and the Total Capital Adequacy Ratio was 18.4%. These levels are significantly higher than the levels set by the European Central Bank as further described in note 44. It is also important that due to the spread of Covid-19, the European Central Bank decided to temporarily deviate from the minimum limits of regulatory capital for European Banks at least until the end of 2022. In this context, it is estimated that for the next 12 months the Total Capital Adequacy Ratio is expected to be higher than the limits that have been set.

Strategic Plan 2020-2022

In November 2019, the Bank announced the Strategic Plan (note 51) for the return of the Group to sustainable profitability. The main pillars of the Plan were a) the drastic reduction of non-performing exposures (NPEs), with a particularly significant contribution to it from the Galaxy transaction namely the securitization transaction and subsequent sale of an NPE portfolio b) the transformation of the Group's operating model, c) the creation of additional value through customer-centric development and d) the focus on the efficiency of the organization's operation through the corporate governance system.

During 2020, and despite the unfavorable conditions for the economic environment, the implementation of the Galaxy transaction continued and on 22.2.2021 a definitive agreement was signed with an investor. At the same time, the Bank continued its actions for the organic management of the NPE portfolio, achieving the organic reduction of the NPE balances within 2020, despite the particularly negative developments for the economy. Finally, the efficiency and flexibility of NPE management was further enhanced by the transfer of related activities to Cepal, in the context of the Galaxy transaction. The Bank maintains its strategic target for de-escalation of the ratio NPE to total loan portfolio below 10% in the medium term, as well as for de-escalation of credit risk cost to levels below 100 basis points.

During 2020, the project of transformation of the Bank and its operating model also began, as the design and implementation of a number of interventions and projects aimed at enhancing the efficiency of the organization, optimizing the business model and further strengthening the systems measuring and rewarding performance in all functions were started. The actions are expected to bring significant benefits to a number of Bank operations and at the same time further enhance profitability, reducing operating costs and enhancing the effectiveness of the business model. The Bank takes actions under the strategic plan to reduce the ratio of operating expenses to income at levels below 50% in the medium term.

Based on the above and taking into account:

- the Group's high capital adequacy,
- the satisfactory liquidity of the Group,
- the actions taken by the Group for the management and decrease of the amount of non-performing loans,
- the measures taken by the Group to protect its employees from coronavirus, the implementation of actions under the Business Continuity Plan and the activation of the ability for teleworking at a large scale whilst ensuring that critical operations are performed,
- the decisions of the eurozone countries to adopt a series of fiscal and other measures to stimulate the economy, according to which Greece is expected to receive € 32 bln from the recovery package for Europe "Next Generation EU"

the Board of Directors estimates that, at least for the next 12 months from the date of approval of the financial statements, the conditions for the application of the going concern principle for the preparation of financial statements are met.

1.1.2 Adoption of new standards and of amendments to standards

▸ **Amendment to International Financial Reporting Standard 3** "Business Combinations": Definition of a Business (Regulation 2020/551/21.4.2020)

On 22.10.2018 the International Accounting Standards Board issued an amendment to IFRS 3 aimed at resolving the difficulties that arise when an entity determines whether it has acquired a business or a group of assets. The amendments:

- clarify the minimum requirements required in order a business to have been acquired,
- the assessment for the acquisition of either a business or a group of assets is simplified and it is based on current condition of acquired elements rather than on the market participant's ability to integrate them into his own processes,
- the definition of outputs is amended so that apart from the revenue arising from ordinary activities falling within the scope of IFRS 15, it also includes other income from main activities such as income from investment services,
- guidance is added to assess whether a production process is substantive both in cases where a product is produced at the date of acquisition and in cases where there is no product produced,
- an optional exercise is introduced based on the fair value of the assets acquired to assess whether a business or group of assets has been acquired.

The adoption of the above amendment had no impact on the financial statements of the Group.

▸ **Amendment to International Financial Reporting Standard 9** "Financial Instruments", to **International Accounting Standard 39** "Financial Instruments" and to **International Financial Reporting Standard 7** "Financial instruments: Disclosures": Interest rate benchmark reform (Regulation 2020/34/15.1.2020)

On 26.9.2019 the International Accounting Standards Board issued amendments to IFRS 9, IAS 39 and IFRS 7, according to which temporary exceptions from the application of specific hedge accounting requirements are provided in the context of interest rate benchmark reform.

In accordance with the exceptions, entities applying those hedge accounting requirements may assume that the interest rate benchmark is not altered as a result of the interest rate benchmark reform. Relief is provided regarding the following requirements:

- the highly probable requirement in cash flow hedge,
- prospective assessments,
- designating a component of an item as the hedged item only at the inception of the hedging relationship.

The adoption of the above amendment had no impact on the financial statements of the Group.

▸ **Amendments to International Accounting Standard 16** "Leases": Covid-19 Related rent concessions (Regulation 2020/1434/9.10.2020)

On 28.10.2020 the International Accounting Standards Board issued amendment to IFRS16 in regards to the accounting treatment of rent concessions occurring as a direct consequence of the Covid-19 pandemic.

According to this amendment, a lessee may elect (practical expedient) not to assess whether a rent concession is a lease modification. The practical expedient is applied for any reduction in lease payments that affects only payments due on or before 30 June 2021.

If the practical expedient is applied, it is assumed that no lease modification has occurred and the lessee may account for the concession as a negative variable lease payment, by recognizing the variable payment in the statement of profit loss and making a corresponding adjustment to the lease liability.

The aforementioned practical expedient is not applicable for the lessors, who continue to apply the existing requirements of the Standard.

The adoption of the above amendment had no impact on the financial statements of the Group.

▸ **Amendments to International Accounting Standard 1** "Presentation of Financial Statements" and to **International Accounting Standard 8** "Accounting Policies, Changes in Accounting Estimates and Errors: Definition of material (Regulation 2019/2104/29.11.2019)

On 31.10.2018 the International Accounting Standards Board, as part of the Disclosure Initiative, issued amendments to IAS 1 and IAS 8 to align the definition of 'material' across the standards and to clarify certain aspects of the definition.

The new definition states that information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. The amendments include examples of circumstances that may result in material information being obscured. The IASB has also amended the definition of material in the Conceptual Framework to align it with the revised definition of material in IAS 1 and IAS 8.

The adoption of the above amendment had no impact on the financial statements of the Group.

▸ **Amendments to references in the conceptual Framework in International Financial Reporting Standards** (Regulation 2019/2075/29.11.2019)

On 29.3.2018 the International Accounting Standards Board issued a revised Conceptual Framework for Financial Reporting, which has been used immediately by the Board and the Interpretations Committee in the issuance of new Standards and Interpretations and become effective for the preparation of Financial Statements for annual periods beginning 1 January 2020. The revised Conceptual Framework includes a) new chapters for adding guidance regarding measurement, derecognition, presentation and disclosure and the definition of the reporting entity, b) update of the definition for assets and liabilities and recognition criteria and c) clarifications regarding the necessity of information for management stewardship in order to meet the objective of financial reporting, as well as the roles of prudence, measurement uncertainty and substance over form in assessing whether information is useful.

Together with the revised Conceptual Framework the IASB has also issued Amendments to references to the Conceptual Framework in IFRS Standards in order to ensure the consistency of the related references with the revised Conceptual

Framework. The Conceptual Framework does not override the requirements of the IFRS Standards but is used by the Group to assist for the development of consistent accounting policies for transactions or other events when no Standard applies.

The adoption of the above amendments had no impact on the financial statements of the Group.

Except for the standards mentioned above, the European Union has adopted the following amendments to standards which are effective for annual periods beginning after 1.1.2020 and have not been early adopted by the Group.

▸ **Amendment to International Financial Reporting Standard 4** "Insurance Contracts": Extension of the temporary exception from applying IFRS 9 (Regulation 2020/2097/15.12.2020):

Effective for annual periods beginning on or after 1.1.2021

On 25.6.2020 the International Accounting Standards Board issued an amendment to IFRS 4 with which extended the temporary exception from applying IFRS 9 by two years. In this context, companies that have used the temporary exception from applying IFRS 9 shall apply the standard by 1.1.2023.

The adoption of the above amendment will have no impact on the financial statements of the Group.

▸ **Amendment to International Financial Reporting Standard 9** "Financial Instruments", to the **International Accounting Standard 39** "Financial Instruments: Recognition and measurement", to **International Financial Reporting Standard 7** "Financial Instruments: Disclosures", to **International Financial Reporting Standard 4** "Insurance Contracts" and **International Financial Reporting Standard 16** "Leases": Interest rate benchmark reform – phase 2 (Regulation 2021/25/13.1.2021)

Effective for annual periods beginning on or after 1.1.2021

On 27.10.2020 the International Accounting Standard Board issued amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 in the context of Phase 2 of the IBOR project that address issues that arise following the reform of an interest rate benchmark rate, including the replacement of one benchmark rate with an alternative one. The key reliefs provided by the Phase 2 amendments are as follows:

- Changes to contractual cash flows. When changing the basis for determining contractual cash flows for financial assets and liabilities (including lease liabilities), the reliefs have the effect that the changes that are required by an interest rate benchmark reform will not result in an immediate gain or loss in the income statement but in the recalculation of the interest rate. The same practical expedient applies for insurers that are applying the temporary exemption from IFRS 9.
- Hedge accounting. The hedge accounting reliefs ensure that changes to the hedge documentation do not result in the discontinuation of hedge accounting nor the designation of a new hedge relationship, as long as the only changes are those permitted by the Phase 2 Amendments. Permitted changes include redefining the hedged risk to reference a risk-free rate and redefining the description of the hedging instruments and/or the hedged items to reflect the risk-free rate. However, additional ineffectiveness might need to be recorded in profit or loss statement.

The Group is examining the impact from the adoption of the above amendments on its financial statements.

In addition, the International Accounting Standards Board has issued the following standards and amendments to standards which have not yet been adopted by the European Union and they have not been early applied by the Group.

▸ **Amendment to the International Financial Reporting Standard 3** "Business Combinations": Reference to the Conceptual Framework

Effective for annual periods beginning on or after 1.1.2022

On 14.5.2020 the International Accounting Standards Board amended IFRS 3 in order to update references to the Conceptual Framework. More specifically:

- amended IFRS 3 in order to refer to the latest version of the Conceptual Framework,
- added a requirement that for transactions within the scope of IAS 37 or IFRIC 21 an acquirer applies IAS 37 or IFRIC 21 instead of the Conceptual Framework to identify liabilities it has assumed in a business combination,
- added an explicit statement that an acquirer does not recognise contingent assets acquired in a business combination.

The adoption of the above amendment is not expected to have any impact on the financial statements of the Group.

▸ **Amendment to International Financial Reporting Standard 10** "Consolidated Financial Statements" and to

International Accounting Standard 28 "Investments in Associates and Joint Ventures": Sale or contribution of assets between an investor and its associate or joint venture.

Effective date: To be determined.

On 11.9.2014 the International Accounting Standards Board issued an amendment to IFRS 10 and IAS 28 in order to clarify the accounting treatment of a transaction of sale or contribution of assets between an investor and its associate or joint venture. In particular, IFRS 10 was amended in order to be clarified that in case that as a result of a transaction with an associate or joint venture, a parent (investor) loses control of a subsidiary, which does not constitute a business, as defined in IFRS 3, it shall recognise to profit or loss only the part of the gain or loss which is related to the unrelated investor's interests in that associate or joint venture. The remaining part of the gain from the transaction shall be eliminated against the carrying amount of the investment in that associate or joint venture. In addition, in case the investor retains an investment in the former subsidiary and the former subsidiary is now an associate or joint venture, it recognises the part of the gain or loss resulting from the remeasurement at fair value of the investment retained in that former subsidiary in its profit or loss only to the extent of the unrelated investor's interests in the new associate or joint venture. The remaining part of the gain is eliminated against the carrying amount of the investment retained in the former subsidiary.

In IAS 28, respectively, it was clarified that the partial recognition of the gains or losses shall be applied only when the involved assets do not constitute a business. Otherwise, the total of the gain or loss shall be recognised.

On 17.12.2015, the International Accounting Standards Board deferred the effective date for the application of the amendment that had been initially determined. The new effective date will be determined by the International Accounting Standards Board at a future date after taking into account the results of its project relating to the equity method.

▸ **International Financial Reporting Standard 14** "Regulatory deferral accounts"

Effective for annual periods beginning on or after 1.1.2016

On 30.1.2014 the International Accounting Standards Board issued IFRS 14. The new standard, which is limited-scope, addresses the accounting treatment and the disclosures required for regulatory deferral accounts that are maintained in accordance with local legislation when an entity provides rate-regulated goods or services. The scope of this standard is limited to first-time adopters that recognized regulatory deferral accounts in their financial statements in accordance with their previous GAAP. IFRS 14 permits these entities to capitalize expenditure that non-rate-regulated entities would recognize as expense.

It is noted that European Union has decided not to launch the endorsement of this standard and to wait for the final standard.

The above standard does not apply to the financial statements of the Group.

▸ **International Financial Reporting Standard 17** "Insurance Contracts" and **Amendment to International Financial Reporting Standard 17** "Insurance Contracts"

Effective for annual periods beginning on or after 1.1.2023

On 18.5.2017 the International Accounting Standards Board issued IFRS 17 which replaces IFRS 4 "Insurance Contracts". In contrast to IFRS 4, the new standard introduces a consistent methodology for the measurement of insurance contracts. The key principles in IFRS 17 are the following:

An entity:

- identifies as insurance contracts those contracts under which the entity accepts significant insurance risk from another party (the policyholder) by agreeing to compensate the policyholder if a specified uncertain future event adversely affects the policyholder;
- separates specified embedded derivatives, distinct investment components and distinct performance obligations from the insurance contracts;
- divides the contracts into groups that it will recognise and measure;
- recognises and measures groups of insurance contracts at:
    i. a risk-adjusted present value of the future cash flows (the fulfilment cash flows) that incorporates all of the available information about the fulfilment cash flows in a way that is consistent with observable market information; plus (if this value is a liability) or minus (if this value is an asset)

ii. an amount representing the unearned profit in the group of contracts (the contractual service margin);

- recognises the profit from a group of insurance contracts over the period the entity provides insurance cover, and as the entity is released from risk. If a group of contracts is or becomes loss-making, an entity recognises the loss immediately;
- presents separately insurance revenue, insurance service expenses and insurance finance income or expenses; and
- discloses information to enable users of financial statements to assess the effect that contracts within the scope of IFRS 17 have on the financial position, financial performance and cash flows of an entity.

On 25.6.2020 the International Accounting Standards Board issued an amendment to IFRS 17 which aimed to ease implementation of the standard and make it easier for entities to explain their financial performance. Additionally, with the amendment the effective date of the standard was postponed to 1.1.2023.

The Group is examining the impact from the adoption of the above standard on its financial statements.

▸ **Amendment to the International Accounting Standard 1** "Presentation of Financial Statements": Classification of liabilities as current or non-current

Effective for annual periods beginning on or after 1.1.2023

On 23.1.2020, the International Accounting Standards Board issued amendments to IAS 1 relating to the classification of liabilities as current or non-current. More specifically:

- The amendments specify that the conditions which exist at the end of the reporting period are those which will be used to determine if the liability must be classified as current or non-current.
- Management expectations about events after the balance sheet date must not be taken into account.
- The amendments clarify the situations that are considered settlement of a liability.

On 15.7.2020 the International Accounting Standards Board extended effective date by one year taking into account the impact of Covid-19.

The above amendment will have no impact on the financial statements of the Group since in Group's balance sheet liabilities are not classified as current and non-current.

▸ **Amendment to the International Accounting Standard 1** "Presentation of Financial Statements": Disclosure of accounting policies

Effective for annual periods beginning on or after 1.1.2023

On 12.2.2021 the International Accounting Standards Board issued an amendment to IAS 1 with which it clarified that:

- The definition of accounting policies is provided by paragraph 5 of IAS 8.
- An entity shall disclose material accounting policy information. Accounting policy information is material if, when considered together with other information included in an entity's financial statements, it can reasonably be expected to influence decisions that the primary users of financial statements make.
- Accounting policy information that relates to immaterial transactions is immaterial and need not be disclosed. Accounting policy information may nevertheless be material because of the nature of the related transactions even if the amounts are immaterial. However, not all accounting policy information relating to material transactions and other events is itself material.
- Accounting policy information is material if users of an entity's financial statements would need it to understand other material information in the financial statements.
- Accounting policy information that focuses on how an entity has applied an accounting policy is more useful to users of financial statements than standardized information or information that only summarizes the requirements of IFRSs.
- If an entity discloses immaterial accounting policy information, such information shall not obscure material accounting policy information.

The Group is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Amendment to the International Accounting Standard 8** "Accounting Policies, Changes in Accounting Estimates and Errors": Definition of accounting estimates

Effective for annual periods beginning on or after 1.1.2023

On 12.2.2021 the International Accounting Standards Board issued an amendment to IAS 8 with which:

- Defined accounting estimates as monetary amounts in financial statements that are subject to measurement uncertainty.
- Clarified that an accounting policy may require items in financial statements to be measured in a way that involves measurement uncertainty. In such a case, an entity develops an accounting estimate. Developing accounting estimates involves the use of judgements and assumptions.
- An entity uses measurement techniques and inputs to develop an accounting estimate.
- An entity may need to change an accounting estimate. By its nature, a change in an accounting estimate does not relate to prior periods and is not the correction of an error. A change in an input or a change in a measurement technique are changes in accounting estimates unless they result from the correction of prior period errors.

The Group is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Amendment to International Accounting Standard 16** "Property, plant and equipment": Proceeds before intended use

Effective for annual periods beginning on or after 1.1.2022

On 14.5.2020 the International Accounting Standards Board issued an amendment to IAS 16 according to which prohibits deducting from the cost of an item of property, plant and equipment any proceeds from selling items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, the proceeds from selling such items and the cost of producing them must be recognized in profit or loss.

The Group is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Amendment to International Accounting Standard 37** "Liabilities, Contingent Liabilities and Contingent Assets": Onerous Contracts – Cost of fulfilling a contract

Effective for annual periods beginning on or after 1.1.2022

On 14.5.2020 the International Accounting Standards Board issued an amendment to IAS 37 in order to clarify that the cost of fulfilling a contract comprises the costs that relate directly to the contract. These costs are both the incremental costs of fulfilling a contract – for example direct labour and materials- and an allocation of other costs that relate directly to fulfilling a contract – for example the depreciation charge of an item of property plant and equipment used in fulfilling that contract.

The Group is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Annual Improvements** – cycle 2018-2020

Effective for annual periods beginning on or after 1.1.2022

As part of the annual improvements project, the International Accounting Standards Board issued on 14.5.2020 non-urgent but necessary amendments to IFRS 1, IFRS 9, IFRS 16 and IAS 41.

The above amendments are not expected to have any impact on the financial statements of the Group.

1.2 Accounting policies

1.2.1 Basis of consolidation

The consolidated financial statements include the parent company Alpha Bank, its subsidiaries, associates and joint ventures. The financial statements used to prepare the consolidated financial statements have been prepared as at 31.12.2020 and the accounting policies applied in their preparation, when necessary, were adjusted to ensure consistency with the Group accounting policies.

a. Subsidiaries

Subsidiaries are entities controlled by the Group.

The Group takes into account the following factors, in assessing control:

- 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 return.

Power arises from currently exercisable rights that provide the Group with the current ability to direct the relevant activities of the investee. In a straightforward case, rights that provide power are derived from voting rights granted by equity instruments such as shares. In other cases, power results from contractual arrangements.

The Group's returns are considered variable, when these returns have the potential to vary as a result of the investee's performance. Variability of returns is judged based on the substance of the arrangement, regardless of their legal form.

The Group, in order to evaluate the link between power and returns, assesses whether it exercises its power for its own benefit or on behalf of other parties, thus acting as either a principal or an agent, respectively. If the Group determines that it acts as a principal, then it controls the investee and consolidation is required. Otherwise, control does not exist and there is no requirement to consolidate.

In cases where the power over an investee arises from voting rights, the Group primarily assesses whether it controls the investee through holding more than 50% of the voting rights. However, the Group can have power even if it holds less than 50% of the voting rights of the investee, through:

- a contractual arrangement between the investors and other vote holders,
- rights arising from other contractual arrangements,
- the size of the investor's holding of voting rights relative to the size and dispersion of holdings of the other vote holders,
- potential voting rights.

In cases of structured entities where the voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual arrangements (i.e. securitization vehicles or mutual funds), the Group assesses the existence of control based on the following:

- the purpose of the entity and the contractual rights of the parties involved,
- the risks to which the investee was designed to be exposed, the risks it was designed to pass on to the parties involved with the investee and the degree of exposure of the Group to those risks,
- indications of a special relationship with the entity, which suggests that the Group has more than a passive interest in the investee.

Furthermore, regarding the structured entities that are managed by the Group, the Group assesses if it acts as principal or an agent based on the extent of its decision – making authority over the entity's activities, the rights of third parties and the degree of its exposure to variability of returns due to its involvement with the entity.

The Group, based on the above criteria, controls structured entities established for the securitization of loan portfolios.

The Group reassess whether it controls an investee if facts and circumstances indicate that there are changes to one or more of the elements of control.

The financial statements of subsidiaries are fully consolidated from the date that control commences until the date that control ceases.

The acquisition method is applied when the Group obtains control of other companies or units that meet the definition of a business. Application of the acquisition method requires identifying the acquirer, determining the acquisition date and measuring the consideration transferred, the identifiable assets acquired, the liabilities assumed and any non controlling interest in the acquiree, in order to determine the amount of goodwill or gain arising from the business combination.

The consideration transferred is measured at fair value on acquisition date. Consideration includes also the fair value of any contingent consideration. The obligation to pay contingent consideration is recognized as a liability or as an equity component, in accordance with IAS 32. The right to the return of a previously transferred consideration is classified as an asset, if specified conditions are met. Subsequently, and to the extent that changes in the value of the contingent consideration do not constitute measurement period adjustments, contingent consideration is measured as follows:

- In case it has been classified in equity, it is not re-measured.
- In all other cases it is measured at fair value through profit or loss.

The identifiable assets acquired and liabilities assumed are initially recognised on acquisition date at their fair value, except from specific assets or liabilities for which a different measurement basis is required. Any non controlling interests are recognised at either fair value or at their proportionate share in the acquiree's identifiable net assets, as long as they are present ownership interests and entitle their holders to a proportionate share of the entity's net assets in the event of liquidation. Otherwise, they are measured at their acquisition date fair values.

Any difference between:

a. the sum of the consideration transferred, the fair value of any previously held equity interest of the Group in the acquiree and the amount of any non – controlling interests, and

b. the net of the acquisition date amounts of the identifiable assets acquired and the liabilities assumed,

is recognised as goodwill if the above difference is positive or as a gain in profit or loss if the difference is negative.

During the measurement period, the provisional amounts recognized at the acquisition date are adjusted in order to reflect new information obtained about facts and circumstances that existed as of the acquisition date and, if known, would have affected the measurement of the amounts recognized as of that date. These adjustments affect accordingly the amount of goodwill. The measurement period ends as soon as the information about facts and circumstances existed as of the acquisition date has been obtained. However, the measurement period shall not exceed one year from the acquisition date.

When the Group's interest in a subsidiary increases as a result of an acquisition, the difference between the consideration paid and the share of net assets acquired is recognized directly in retained earnings.

Sales of ownership interests in subsidiaries that do not result in a loss of control for the Group are accounted for as equity transactions and the gain or loss arising from the sale is recognized directly in retained earnings.

Intercompany transactions are eliminated, unless the transaction provides evidence of impairment of the asset transferred, in which case, it is recognized in the consolidated balance sheet.

b. Associates

Associates are entities over which the Group has significant influence but not control. Significant influence is generally presumed to exist when the Group holds, directly or indirectly, more than 20% of the share capital of the company concerned without having control or joint control, unless the ownership of more than 20% does not ensure significant influence, e.g. due to lack of representation of the Group in the company's Board of Directors or due to the Group's non-participation in the policy making process.

Investments in associates are accounted for using the equity method of accounting. The investment is initially recognised at cost and adjusted thereafter for the post acquisition change in the Group's share of net assets of the associate. In case the losses according to the equity method exceed the investment in ordinary shares, they are recognized as a reduction of other elements that are essentially an extension of the investment in the associate.

The Group's share of the associate's profit or loss and other comprehensive income is separately recognized in the income statement and in the statement of comprehensive income, accordingly.

c. Joint ventures

The Group applies IFRS 11 which deals with the accounting treatment of interests in joint arrangements. All joint arrangements in which the Group participates and has joint control are joint ventures, which are accounted for by using the equity method.

A detailed list of all Group subsidiaries, associates and joint ventures, as well as the Group's ownership interest in them, is provided in note 40.

1.2.2 Operating Segments

Operating segments are determined and measured based on the information provided to the Executive Committee of the Bank, which is the body responsible for the allocation of resourses between the Group's operating segments and the assessment of their performance.

Based on the above, and given the Group's administrative structure and activities, the following operating segments have been determined:

- Retail Banking
- Corporate Banking
- Asset Management and Insurance
- Investment Banking and Treasury
- South Eastern Europe
- Other

Since the Group operates in various geographical areas, apart from the operating segments identified above, the financial statements contain information based on the below distinction:

- Greece
- Other Countries

It is noted that the methods used to measure operating segments for the purpose of reporting to the Executive Committee are not different from those required by the International Financial Reporting Standards.

Detailed information relating to operating segments is provided in note 42.

1.2.3 Transactions in foreign currency and translation of foreign operations

a. Transactions in foreign currency

The consolidated financial statements are presented in Euro, which is the functional currency and the currency of the country of incorporation of the parent company Alpha Bank.

Items included in the financial statements of the subsidiaries are measured in the functional currency of each subsidiary which is the currency of the company's country of incorporation or the currency used in the majority of the transactions held.

Transactions in foreign currencies are translated into the functional currency of each subsidiary at the closing exchange rate at the date of the transaction.

Monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the closing exchange rate at the balance sheet date. Foreign exchange differences arising from the translation are recognized in the income statement.

Non-monetary assets and liabilities are translated using the rate of exchange at the transaction date, except for non-monetary items denominated in foreign currencies that are measured at fair value which are translated at the exchange rate of the date that the fair value is determined. The exchange differences relating to these items are part of the change in fair value and they are recognized in the income statement or recorded directly in equity depending on the classification of the non-monetary item.

b. Translation of foreign operations

The financial statements of all group entities that have a functional currency that is different from the presentation currency of the Group financial statements are translated as follows:

i. Assets and liabilities are translated to Euro at the closing rate applicable on the balance sheet date. The comparative figures presented are translated to Euro at the closing rates at the respective date of the comparative balance sheet.

ii. Income and expense items are translated to Euro at average exchange rates applicable for each period presented.

The resulting exchange difference from the retranslation and those arising from other monetary items designated as a part of the net investment in the entity are recorded in equity. When a foreign entity is sold, the exchange differences are reclassified to the income statement as part of the gain or loss on sale.

1.2.4 Cash and cash equivalents

For the purposes of the consolidated cash flow statement, cash and cash equivalents consists of:

a. Cash on hand

b. Non-restricted balances with Central Banks and

c. Short-term balances due from banks and Reverse Repo agreements

Short-term balances are amounts that mature within three months of the balance sheet date.

Non-restricted placements with Central Banks, short-term balances due from banks and Reverse Repo agreements are measured at amortised cost.

1.2.5 Classification and measurement of financial instruments

Initial recognition

The Group recognises financial assets or financial liabilities in its statement of financial position when it becomes a party to the terms of the contract.

At initial recognition the Group measures financial assets and liabilities at fair values. Financial instruments not measured at fair value through profit or loss are initially recognised at fair value plus or minus transaction costs and income or fees that are directly attributable to the acquisition or issue of the financial instrument.

Regular way purchases and sales of financial instruments are recognized at the settlement date with the exception of equity shares and derivatives that are recognized on trade date. For bonds that are measured at fair value, the change in fair value during the period between the trade date and the settlement date is recognized in profit or loss or in other comprehensive income based on the bond's classification category.

Subsequent measurement of financial assets

The Group classifies its financial assets as:

- Financial assets measured at amortised cost
- Financial assets measured at fair value through other comprehensive income, with gains or losses reclassified in profit or loss on derecognition
- Equity instruments measured at fair value through other comprehensive income, with no reclassification in gains or losses to profit or loss on derecognition
- Financial assets measured at fair value through profit or loss.

For each of the above categories the following apply:

a) Financial assets measured at amortised cost

In this category are classified the financial assets that satisfy both of the following criteria:

- are held within a business model whose objective is to hold financial assets in order to collect contractual cash flows,
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

The above category is measured at amortised cost using the effective interest method and is periodically assessed for expected credit losses, as it is further described in notes 1.2.13 and 1.2.14.

b) Financial assets measured at fair value through other comprehensive income, with gains or losses reclassified in profit or loss on derecognition

In this category are classified the financial assets that satisfy both of the following criteria:

- are held within a business model whose objective is a both to collect contractual cash flows and selling financial assets,
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

The above category is periodically assessed for expected credit losses, as it is further described in notes 1.2.13 and 1.2.14.

c) Equity instruments measured at fair value through other comprehensive income, with no reclassification in gains or losses to profit or loss on derecognition

In this category are classified equity instruments that are neither held for trading nor contingent consideration recognised by an acquirer in a business combination and that Group decides, at initial recognition, to measure at fair value through other comprehensive income. This decision is irrevocable. With the exception of dividends, which are directly recognized in profit or loss, all other gains and losses arising from those instruments are directly recognized in other comprehensive income and are not reclassified to profit or loss. For those equity instruments there is no impairment assessment.

d) Financial assets measured at fair value through profit or loss

Financial assets included in this category are:

i. those acquired principally for the purpose of selling in the near term to obtain short term profit (held for trading).The Group has included in this category bonds, treasury bills and a limited number of shares.

ii. those that do not meet the criteria to be classified into one of the above categories

iii. those the Group designated, at initial recognition, as at fair value through profit or loss. This classification option, which is irrevocable, is used when the designation eliminates an accounting mismatch which would otherwise arise from measuring financial assets and liabilities on a different basis (i.e. amortised cost) in relation to another financial asset or liability (i.e. derivatives which are measured at fair value through profit or loss).

As at the reporting date, the Group had not designated, at initial recognition, any financial assets as at fair value through profit or loss.

Business Model assessment

The business model reflects how the Group manages its financial assets in order to generate cash flows. That is, the Group's business model determines whether cash flows will result from collecting contractual cash flows, selling financial assets or both. The Group's business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. Accordingly, business model does not depend on management's intentions for an individual instrument but it is determined on a higher level of aggregation.

The business models of the Group are determined by the Asset Liability Committee (ALCO) or the Executive Committee (ExCo) which decide on the determination of the business model both for the loans and advances to customers and the securities portfolio. In this context:

- Loans and advances to customers and due from banks are included in the business model whose objective is to hold financial assets in order to collect contractual cash flows (hold to collect)
- For bonds and in general for fixed income investments, the Group has identified the following business models:
  - Business model whose objective is to hold financial instruments in order to collect their contractual cash flows (hold to collect)
  - Business model that aims both at collecting contractual cash flows and selling (hold to collect and sell)
  - Trading portfolio.

The determination of the above business models has been based on:

- The way the performance of the business model and the financial assets held within that business model are evaluated and reported to the Group key management personnel.
- The risks that affect the performance of the business model (and the financial assets held within that business model) and, specifically, the way those risks are managed.
- The way the managers are evaluated (e.g., whether the evaluation is based on the fair value of the assets managed or the contractual cash flows collected).
- Past and expected frequency and value of sales from the portfolio

The Group, at each reporting date, reassesses its business models in order to confirm that there has been no change compared to the prior period or application of a new business model. In the context of the reassessment of the hold to collect business model past sales as well as expected future sales are taken into account. In this assessment, the following cases of sales are considered consistent with a hold to collect business model:

a) Sales of non performing loans due to the credit deterioration of the debtor, excluding those sales of loans considered as credit impaired at origination.

b) Sales made close to the maturity of the financial assets so that the proceeds from the sales approximate the collection of the remaining contractual cash flows. In these cases, the Group defines as 'close', what is less than 5% of the total life of the instrument remaining at the time of sale.

c) Sales (excluding a and b) which are infrequent (even if significant in value) or insignificant in value both individually and in aggregate (even if frequent). The Group has defined the following thresholds:

   - Significance: Sales exceeding 5% the previous reporting period gross balance of the respective portfolio
   - Frequency: Significant sale transactions occurring more than twice a year.

In addition, for bond portfolio the following sales are considered consistent with a hold to collect business model:

- Sales of bonds that do not longer meet the requirements stated in the investment policy due to a significant increase in issuer's credit risk.
- Infrequent sales under liquidity stress conditions.

Solely Payments of Principal and Interest (SPPI) assessment of the contractual cash flows

For the purposes of applying the SPPI assessment:

- Principal is the fair value of the asset at initial recognition, which may change over the life of the financial asset (for example if there are repayments of principal).
- Interest is the consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks (i.e. liquidity risk) and costs, as well as a profit margin.

Contractual terms that introduce exposure to risks and volatility in the contractual cash flows that are not related to a basic lending arrangement, such as exposure to changes in equity prices or commodity prices, do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding.

In this context, in assessing whether contractual cash flows are SPPI, the Group assesses whether the instrument contain contractual terms that change the timing or amount of contractual cash flows. More specifically, the following are taken into account:

- Leveraged payments
- Payments linked with the variability in exchange rates
- Conversion to equity terms
- Interest rates indexed to non-interest variables
- Prepayment or extension options
- Terms that limit the Group's claim to the cash flows from specified assets or based on which the Group has no contractual right to unpaid amounts
- Interest-free deferred payments
- Terms based on which the performance of the instruments is affected by equity or commodity prices

Especially in the case of financing of a special purpose vehicle, in order for the loan to meet the criterion that its cash flows are solely payments of principal and interest on the principal amount outstanding, among other, at least one of the following conditions should apply:

- At initial recognition, LTV (Loan to Value) shall not exceed the threshold of 80% or LLCR (Loan Life Coverage Ratio) shall be at least equal to the threshold of 1.25.
- The equity of the special purpose vehicle shall amount to at least 20% of its total assets.
- There are sufficient collaterals that are not related to the asset being funded.

In addition, in determining whether contractual cash flows are solely payments of principal and interest on the principal amount outstanding, it is assessed whether time value of money element has been modified. Time value of money is the element of interest that provides consideration for only the passage of time. That is, the time value of money element does not provide consideration for other risks or costs associated with holding the financial asset. However, in some cases, the time value of money element may be modified. That would be the case, for example, if a financial asset's interest rate is periodically reset but the frequency of that reset does not match the tenor of the interest rate or if a financial asset's interest rate is periodically reset to an average of particular short- and long-term interest rates. In such cases, the Group assesses the modification to determine whether the contractual cash flows represent solely payments of principal and interest on the principal amount outstanding. The objective of the assessment is to determine how different the contractual (undiscounted) cash flows could be from the (undiscounted) cash flows that would arise if the time value of money element was not modified (benchmark test). The effect of the modified time value of money element must be considered in each reporting period and cumulatively over the life of the instrument. If the Group concludes that the contractual (undiscounted) cash flows could be significantly different from the (undiscounted) benchmark cash flows, the contractual cash flows are not solely payments of principal and interest on the principal amount outstanding. According to the policy set by the Group, the above assessment test does not result in significant different contractual cash flows when the cumulative difference over the life of the instrument does not exceed 10% and at the same time the number of individual cash flows with a difference of more than 10% do not exceed 5% of total reporting periods of the asset until maturity.

Reclassification of financial assets

Reclassifications of financial assets between measurement categories occur when, and only when, the Group changes its business model for managing the assets. In this case the reclassification is applied prospectively. Changes in the business model of the Group are expected to be rare. They arise from decisions of the Asset Liability Committee (ALCO) or the Executive Committee (ExCo) as a result of external or internal changes which must be significant to the entity's operations and demonstrable to external parties.

If the Group reclassifies a financial asset out of the amortised cost measurement category and into the fair value through profit or loss measurement category, its fair value is measured at the reclassification date. Any gain or loss arising from a difference between the previous amortised cost of the financial asset and fair value is recognized in profit or loss. The same happens if the Group reclassifies a financial asset out of the amortised cost measurement category and into the fair value through other comprehensive income measurement category, however in this case the difference between the previous amortised cost of the financial asset and fair value is recognized in other comprehensive income. The effective interest rate and the measurement of expected credit losses are not adjusted as a result of the reclassification. However, the loss allowance would be derecognized (and thus would no longer be recognized as an adjustment to the gross carrying amount) but instead would be recognized as an accumulated impairment amount in other comprehensive income.

If the Group reclassifies a financial asset out of the fair value through profit or loss measurement category and into the amortised cost measurement category, its fair value at the reclassification date becomes its new gross carrying amount. At this date, the effective interest rate of the asset is calculated while the date of the reclassification is treated as the date of initial recognition for impairment calculation purposes.

If the Group reclassifies a financial asset out of the fair value through profit or loss measurement category and into the fair value through other comprehensive income measurement category, the financial asset continues to be measured at fair value. As in the above case, at this date, the effective interest rate of the asset is calculated while the date of the reclassification is treated as the date of initial recognition for impairment calculation purposes.

If a financial asset is reclassified out of the fair value through other comprehensive income measurement category and into the amortised cost measurement category, the asset is reclassified at its fair value at the measurement date. However, the cumulative gain or loss previously recognized in other comprehensive income is reversed and adjusted against the fair value of the financial asset at the reclassification date. As a result, the financial asset is measured at the reclassification date as if it had always been measured at amortised cost. This reversal affects other comprehensive income but does not affect profit or loss and therefore is not a reclassification adjustment under IAS 1. The effective interest rate and the calculation of expected credit losses are not affected. However, the loss allowance is recognized as an adjustment to the gross carrying amount of the financial asset from the reclassification date.

If the Group reclassifies a financial asset out of the fair value through other comprehensive income measurement category and into the fair value through profit or loss measurement category, the financial asset continues to be measured at fair value. The cumulative gain or loss previously recognised in other comprehensive income is reclassified from equity to profit or loss as a reclassification adjustment (in accordance with IAS 1) at the reclassification date.

Derecognition of financial assets

The Group derecognizes financial assets when:

- the contractual rights to the assets cash flows expire,
- the contractual right to receive the cash flows of the financial assets are transferred and at the same time all the risks and rewards of ownership are substantially transferred,
- loans or investments in securities are no longer recoverable and consequently are written off,
- the contractual cash flows of the assets are significantly modified.

In the case of transactions where despite the transfer of the contractual right to receive the cash flows from financial assets both the risk and rewards remain with the Group, no derecognition of these financial assets occurs. The amount received by the transfer is recognized as a financial liability. The accounting practices followed by the Group in such transactions are discussed in notes 1.2.21 and 1.2.22.

In the case of transactions, whereby the Group neither retains nor transfers risks and rewards of the financial assets, but retains control over them, the financial assets are recognized to the extent of the Group's continuing involvement. If the Group does not retain control of the assets then they are derecognised, and in their position the Group recognizes, distinctively, the assets and liabilities which are created or retained during the transfer. No such transactions occurred upon balance sheet date. In case of a change in the contractual terms of a financial asset, the change is considered significant and therefore it results in the derecognition of the original financial asset and the recognition of a new one when one of the following criteria is met:

- Change of issuer/debtor
- Change in denomination currency
- Consolidation of different types of contracts
- Consolidation of contracts that do not entirely satisfy the criterion that cash flows are solely payments of principal and interest on the principal amount outstanding
- Addition or deletion of equity conversion terms
- Separation of a non-SPPI debt instrument into two or more new instruments so that the reason that leads to SPPI failure of the original instrument is not included in all of the new instruments.
- Significant modifications occurring due to the commercial renegotiation of the contractual terms of performing borrowers.

In case of derecognition due to significant modification, the difference between the carrying amount of the original asset and the fair value of the new asset is directly recognized in the Income Statement, as specifically mentioned in notes 1.2.27 and 1.2.28. Additionally, in case the original asset was measured at fair value through other comprehensive income, the cumulative gains or losses recognized in other comprehensive income is transferred to profit or loss.

In contrast, if the change in contractual cash flows is not significant, the gross carrying amount of the asset is recalculated by discounting new contractual cash flows with the original effective interest rate and the difference compared to the current gross carrying amount is directly recognized in profit or loss (modification gain or loss) in the line item "Impairment losses and provisions to cover credit risk". Fees related to the modification adjust the carrying amount of the asset and are amortised over the remaining term of the modified financial asset through the effective interest method.

Subsequent measurement of financial liabilities

The Group classifies financial liabilities in the following categories for measurement purposes:

a) Financial liabilities measured at fair value through profit or loss

i. This category includes financial liabilities held for trading, that is:

  - financial liabilities acquired or incurred principally with the intention of selling or repurchasing in the near term for short term profit, or
  - derivatives not used for hedging purposes. Liabilities arising from either derivatives held for trading or derivatives used for hedging purposes are presented as "derivative financial liabilities" and are measured according to the principles set out in note 1.2.6.

ii. this category also includes financial liabilities which are designated by the Group as at fair value through profit or loss upon initial recognition, when:
   - doing so results in more relevant information, because either:
     - it eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases; or
     - a group of financial liabilities or financial assets and financial liabilities is managed and its performance is evaluated on a fair value basis, in accordance with a documented risk management or investment strategy, and information about the group is provided internally on that basis to the Group's key management personnel; or
   - the contract contains one or more embedded derivatives and the Group measures the compound financial instrument as a financial liability measured at fair value through profit or loss unless:
     - the embedded derivative does not significantly modify the cash flows that otherwise would be required by the contract or
     - it is clear with little or no analysis when a similar hybrid instrument is first considered that the separation of the embedded derivative(s) is prohibited.

   It is noted that in the above case, the amount of the change in fair value attributable to the Group's credit risk is recognized in other comprehensive income, unless this treatment would create or enlarge an accounting mismatch in profit or loss. Amounts recognized in other comprehensive income are never tranferred to profit or loss.

As at the reporting date, the Group had not designated, at initial recognition, any financial liabilities as at fair value through profit or loss.

b) Financial liabilities carried at amortised cost

The liabilities classified in this category are measured at amortised cost using the effective interest method.

Liabilities to credit institutions and customers, debt securities issued by the Group and other loan liabilities are classified in this category.

In cases when financial liabilities included in this category are designated as the hedged item in a hedge relationship, the accounting principles applied are those set out in note 1.2.6.

c) Liabilities arising from financial guarantees and commitments to provide loans at a below market interest rate

A financial guarantee contract is a contract that requires the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make a payments when due in accordance with the agreed terms.

The financial guarantee contracts and the commitments to provide loans at a below market interest rate are initially recognized at fair value, and measured subsequently at the higher of:

- the amount of the provision determined during expected credit loss calculation (note 1.2.13),
- the amount initially recognised less cumulative amortization which is calculated based on the term of the instrument.

d) Financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition or when the continuing involvement approach applies

In the first case the liability should be equal to the amount received during the transfer while in the second case it should measured in such a way that the net carrying amount of the transferred asset and the associated liability is:

- The amortised cost of the rights and obligations retained by the Group, if the transferred asset is measured at amortised cost or
- Equal to the fair value of the rights and obligations retained by the Group when measured on a stand-alone basis, if the transferred asset is measured at fair value.

e) Contingent consideration recognized by an acquirer in a business combination

Such contingent consideration is subsequently measured at fair value with changes recognized in profit or loss.

Derecognition of financial liabilities

Financial liabilities (or part thereof) are derecognized when the contractual obligation is been discharged, cancelled or expires.

When a financial liability is exchanged for another liability with substantially different terms, the exchange is accounted for as an extinguishment of the original financial liability and the recognition of a new one. The same applies in cases of a substantial modification of the terms of an existing financial liability or a part of it (whether or not attributable to the financial difficulty of the debtor). The terms are considered substantially different if the discounted present value of the cash flows under the new terms (including any fees paid net of any fees received), discounted using the original effective interest rate, is at least 10% different from the present value of the remaining cash flows of the original financial liability.

In cases of derecognition, the difference between the carrying amount of the financial liability (or part of the financial liability) extinguished or transferred to another party and the consideration paid, including any non-cash assets transferred or liabilities assumed, is recognised in profit or loss.

Offsetting financial assets and financial liabilities

Financial assets and liabilities are offset and the amount are reported net on the balance sheet, only in cases when the Group has the legally enforceable right to offset recognized amounts and there is the intention to settle on a net basis, or to realize the asset and settle the liability simultaneously.

1.2.6 Derivative financial instruments and hedge accounting

Derivative financial instruments

Derivatives are financial instruments that upon inception have a minimal or zero fair value that subsequently changes in accordance with a particular underlying instrument or indices defined in the contract (foreign exchange, interest rate, index or other variable).

All derivatives are recognized as assets when their fair value is positive and as liabilities when their fair value is negative.

Derivatives are entered into for either hedging or trading purposes and they are measured at fair value irrespective of the purpose for which they have been transacted.

The change in the fair value of the interest and currency derivatives, excluding options, is separated into interest, foreign exchange differences and other gains or losses from financial transactions.

In case a derivative is embedded in a financial asset, the embedded derivative is not separated and the hybrid contract is accounted for based on the classification requirements mentioned in note 1.2.5.

In case a derivative is embedded in a host contract, other than a financial asset, the embedded derivative is separated and measured at fair value through profit or loss when the following conditions are met:

- the economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host,
- a separate instrument with the same terms as the embedded derivative would meet the definition of a derivative; and
- the hybrid contract is not measured at fair value with changes in fair value recognised in profit or loss.

The Group uses derivatives as a means of exercising Asset-Liability management within the guidelines established by the Asset-Liability Committee (ALCO).

In addition the Group uses derivatives for trading purposes to exploit short-term market fluctuations, within the Group risk level set by the Asset-Liability Committee (ALCO).

Valuation differences arising from derivatives are recognized in Gains less losses on financial transactions except when derivatives participate in hedging relationships in which case the principles for hedge accounting mentioned below apply.

When the Group uses derivatives for hedging purposes hedge relationships are formally designated and documented at inception and effectiveness is monitored on an ongoing basis at each balance sheet date.

We emphasize the following:

a. Synthetic Swaps

The parent company (Alpha Bank), in order to increase the return on deposits to selected customers, uses synthetic swaps.

This involves the conversion of a Euro deposit to JPY or other currency with a simultaneous forward purchase of the related currency to cover the foreign exchange exposure.

The result arising from the forward transaction is recognized as interest expense, which is included in deposits' interest expense, foreign exchange differences and other gains less losses on financial transactions.

b. FX Swaps

These types of swaps are entered into primarily to economically hedge the exposures arising from customer loans and deposits.

For those cases for which no hedge accounting is applied, swaps are accounted for as trading instruments.

The result arising from these derivatives is recognized as interest and foreign exchange differences, in order to match with the interest element and foreign exchange differences resulting from the deposits and loans, and as other gains less losses on financial transactions.

Hedge accounting

Hedge accounting establishes the valuation rules to offset the gain or loss of the fair value of a hedging instrument and a hedged item which would not have been possible if the normal measurement principles were applied. It is noted that the Group has opted to continue to apply the provisions for hedge accounting of IAS 39.

Documentation of the hedging relationship upon inception and of the effectiveness of the hedge on an on-going basis are the basic requirements for the adoption of hedge accounting.

The hedge relationship is documented upon inception and the hedge effectiveness test is carried out upon inception and is repeated at each reporting date.

A hedge is regarded as highly effective only if both of the following conditions are met:

- at the inception of the hedge and in subsequent periods the hedge is expected to be highly effective in achieving offsetting changes in fair value or cash flows attributable to the hedged risk during the period for which the hedge is designated,
- the results of the hedge are within a range of 80%-125% of the results of the hedged item.

a. Fair value hedges

A fair value hedge of a financial instrument offsets the change in the fair value of the hedged item in respect of the risks being hedged.

Changes in the fair value of both the hedging instrument and the hedged item, in respect of the specific risk being hedged, are recognized in the income statement.

When the hedging relationship no longer exists, the hedged items continue to be measured based on the classification and valuation principles set out in note 1.2.5. Specifically any adjustment, due to the fair value change of a hedged item for which the effective interest method is used, up to the point that the hedging relationship ceases to be effective, is amortised to interest income or expense based on a recalculated effective interest rate, over its remaining life.

The Group uses interest rate swaps (IRS's) to hedge risks relating to borrowings and loans.

b. Cash flow hedge

A cash flow hedge changes the cash flows of a financial instrument from a variable rate to a fixed rate.

The effective portion of the gain or loss on the hedging instrument is recognized directly in other comprehensive income, in cash flow hedge reserve, whereas the ineffective portion is recognized in Gains less losses on financial transactions. The accounting treatment of the hedged item does not change.

When the hedging relationship is discontinued, the amount recognized in equity remains there separately until the cash flows or the future transaction occur. When the cash flows or the future transaction occur the following apply:

- If the result is the recognition of a financial asset or a financial liability, the amount is reclassified to profit or loss in the same periods during which the hedged forecast cash flows affect profit or loss.
- If the result is the recognition of a non-financial asset or a non-financial liability or a firm commitment for which fair value hedge accounting is applied, the amount recognized in equity either is reclassified to profit or loss in the same periods during which the asset or the liability affect profit or loss or adjusts the carrying amount of the asset or the liability.

When a forecasted transaction or the expected cash flows are no longer expected to occur, the cumulative gain or loss that was recognized in equity is reclassified to profit or loss. In particular, the amount that has been recognized in equity, as a result of revoked cash flow hedging relationships for term deposits, is linearly amortised as interest expense in the periods during which the hedged cash flows from the aforementioned term deposits affect profit or loss.

c. Hedges of net investment in a foreign operation

The Group uses foreign exchange derivatives or borrowings to hedge foreign exchange risks arising from investment in foreign operations.

Hedge accounting of net investment in a foreign operation is similar to cash flow hedge accounting. The cumulative gain or loss recognized in equity is reversed and recognized in profit or loss, at the time that the disposal of the foreign operation takes place.

1.2.7 Fair Value Measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date, in the principal market for the asset or liability or, in the absence of a principal market, in the most advantageous market for the asset or liability.

The Group measures the fair value of assets and liabilities traded in active markets based on available quoted market prices. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm’s length basis. Especially, for the measurement of securities, the Group uses a particular range of prices, within the bid-ask spread, in order to characterize the prices as prices of an active market (the difference between bid and ask prices quoted should not exceed 1.5/100 nominal value). Furthermore, if quoted market prices are not available on the measurement date, but they are available during the three last working days of the reporting period and there are quoted prices for 15 working days during the last month of the reporting period and the criteria of the bid-ask spread is met, then the market is considered to be active.

The fair value of financial instruments that are not traded in an active market is determined by the use of valuation techniques, appropriate in the circumstances, and for which sufficient data to measure fair value are available, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs. If observable inputs are not available, other model inputs are used which are based on estimations and assumptions such as the determination of expected future cashflows, discount rates, probability of counterparty default and prepayments. In all cases, the Group uses the assumptions that ‘market participants’ would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

Assets and liabilities which are measured at fair value or for which fair value is disclosed are categorized according to the inputs used to measure their fair value as follows:

- Level 1 inputs: quoted market prices (unadjusted) in active markets
- Level 2 inputs: directly or indirectly observable inputs
- Level 3 inputs: unobservable inputs used by the Group, to the extent that relevant observable inputs are not available

In particular, the Group applies the following:

Financial instruments

For financial instruments the best evidence of fair value at initial recognition is the transaction price, unless the fair value can be derived by other observable market transactions relating to the same instrument, or by a valuation technique using mainly observable inputs. In these cases, if the fair value differs from the transaction price, the difference is recognized in the statement of comprehensive income. In all other cases, fair value is adjusted to defer the difference with the transaction price.

After initial recognition, the deferred difference is recognized as a gain or loss only to the extent that it arises from a change in a factor that market participants would take into account when pricing the instrument.

When measuring fair value, the Group takes into consideration the effect of credit risk. Specifically, for derivative contracts, the Group estimates the credit risk of both counterparties (bilateral credit valuation adjustments).

The Group measures fair value for all assets and liabilities separately. Regarding derivative exposures, however, that the Group manages as a group on a counterparty basis and for which it provides information to the key management personnel, the fair value measurement for credit risk is performed based on the net risk exposure per counterparty. Credit valuation adjustments arising from the aforementioned process are allocated to either assets or liabilities, depending on whether the net exposure to the counterparty is long or short respectively.

Furthermore, the fair value of deposit accounts with a demand feature (such as saving deposits) is no less than the amount payable on demand, discounted from the first date that the amount could be required to be paid.

The principal inputs to the valuation techniques used by the Group are:

- Bond prices - quoted prices available for government bonds and certain corporate securities.
- Credit spreads - these are derived from active market prices, prices of credit default swaps or other credit based instruments, such as debt. Values between and beyond available data points are obtained by interpolation and extrapolation.
- Interest rates - these are principally benchmark interest rates such as the LIBOR, OIS and other quoted interest rates in the swap, bond and futures markets. Values between and beyond available data points are obtained by interpolation and extrapolation.
- Foreign currency exchange rates - observable markets both for spot and forward contracts and futures.
- Equity and equity index prices - quoted prices are generally readily available for equity shares listed on stock exchanges and for major indices on such shares.
- Price volatilities and correlations - Volatility and correlation values are obtained from pricing services or derived from option prices.
- Unlisted equities - financial information specific to the company or industry sector comparables.
- Mutual Funds- for open-ended investments funds listed on a stock exchange the published daily quotations of their net asset values (NAVs).
- Loans and Deposits- market data and Bank/customer specific parameters.

Non financial assets and liabilities

The most important category of non financial assets for which fair value is estimated is real estate property.

The process, mainly, followed for the determination of the fair value is summarized below:

- Assignment to the engineer - valuer
- Case study- Setting of additional data
- Autopsy - Inspection
- Data processing - Calculations
- Preparation of the valuation report

To derive the fair value of the real estate property, the valuer chooses among the three following valuation techniques:

- Market approach (or sales comparison approach), which measures the fair value by comparing the property to other identical ones for which information on transactions is available.
- Income approach, which capitalizes future cash flows arising from the property using an appropriate discount rate.
- Cost approach, which reflects the amount that would be required currently to replace the asset with another asset with similar specifications, after taking into account the required adjustment for impairment.

Examples of inputs used to determine the fair value of properties and which are analysed to the individual valuations, are the following:

- Commercial property: price per square meter, rent growth per annum, long-term vacancy rate, discount rate, expense rate of return, lease term, rate of non leased properties/units for rent.
- Residential property: Net return, reversionary yield, net rental per square meter, rate of continually non leased properties/units, expected rent value per square meter, discount rate, expense rate of return, lease term etc.
- General assumptions such as the age of the building, residual useful life, square meter per building etc are also included in the analysis of the individual valuation assessments.

It is noted that the fair value measurement of a property takes into account a market's participant ability to generate economic benefits by using the asset in it's highest and best use or by selling it to another market participant that would use the asset in it's highest and best use.

1.2.8 Property, Plant and Equipment

This caption includes: land, buildings used by branches or for administrative purposes, additions and improvements of leased property and equipment. It also includes right of use assets in case those assets are used by the Group (the accounting policies applicable to those assets are presented in note 1.2.11).

Property, plant and equipment are initially recognised at cost which includes any expenditure directly attributable to the acquisition of the asset.

Subsequently, property, plant and equipment are measured at cost less accumulated depreciation and impairment losses.

Subsequent expenditure is recognized on the carrying amount of the item when it increases future economic benefit for the Group and it can be measured reliably.

Expenditure on repairs and maintenance is recognized in profit or loss as an expense as incurred.

Depreciation is charged on a straight line basis over the estimated useful lives of property, plant and equipment and it is calculated on the asset's cost minus residual value.

The estimated useful lives are as follows:

- Buildings: up to 50 years
- Additions to leased fixed assets and improvements: duration of the lease
- Equipment and vehicles: up to 40 years

Land is not depreciated but is tested for impairment.

The residual value of property and equipment and their useful lives are periodically reviewed and adjusted if necessary at each reporting date.

Property, plant and equipment are reviewed on an annual basis to determine whether there is an indication of impairment and if they are impaired the carrying amount is adjusted to its recoverable amount with the difference recorded in profit or loss.

In case of sale of property, plant and equipment as well as when no economic benefits are expected for the Group, the fixed asset is derecognised. When selling the asset, the difference between the sale price and its carrying amount is recognized in profit or loss.

1.2.9 Investment property

The Group includes in this category buildings or portions of buildings together with their respective portion of land that are held to earn rental income. The Group has also included in this category right of use assets when the Group is an intermediate lessor in an operating lease (the accounting policies applicable to those assets are presented in note 1.2.11).

Investment property is initially recognised at cost which includes any expenditure directly attributable to the acquisition of the asset.

Subsequently investment property is measured at cost less accumulated depreciation and impairment losses.

Subsequent expenditure is recognized on the carrying amount of the item when it increases future economic benefit and can be measured reliably. All costs for repairs and maintenance are recognized in profit or loss as incurred.

The estimated useful lives over which depreciation is calculated using the straight line method are the same as those applied to property, plant and equipment.

Transfers to and from the category of investment property are made when the property meets (or ceases to meet) the definition of investment property and there is evidence of change in its use. In particular, the property is reclassified in "Property, plant and equipment" if the Group decides to use it while it is reclassified in the category of property held for sale if a decision is taken to sell it and if the criteria referred to in paragraph 1.2.17 are met. Conversely, property not classified as "Investment Property" is transferred to this category in case a decision for its lease is made.

In case of sale of investment property as well as when no economic benefits are expected for the Group, the fixed asset is derecognised. When selling the asset, the difference between the sale price and its carrying amount is recognized in profit or loss.

1.2.10 Goodwill and other intangible assets

Goodwill

Goodwill represents the difference between the cost of an acquisition as well as the value of non-controlling interests and the fair value of the assets and liabilities of the entity acquired, as at the acquisition date.

Positive goodwill arising from acquisitions after 1/1/2004 is recorded to "Goodwill and other intangible assets", if it relates to the acquisition of a subsidiary, and it is tested for impairment at each balance sheet date. Goodwill on acquisitions of associates or joint ventures is included in "Investment in associates and joint ventures".

Negative goodwill is recognized in profit or loss.

Other intangible assets

The Group has included in this caption:

a) Intangible assets which are recognized from business combinations or which are individually acquired. These intangible assets include the value attributed to the acquired customer relationships and to deposit bases. Intangible assets arising from business combinations are initially measured at fair value while those individually acquired are initially measured at cost. Subsequently, they are depreciated, using the straight line method, during their useful life, which has been determined from 6 to 9 years, and are assessed for impairment when there are triggers for impairment.

b) Software, which is measured at cost less accumulated amortization and impairment losses. Expenditure incurred to maintain software programs is recognized in the income statement as incurred. Software that is considered to be an integral part of hardware (hardware cannot operate without the use of the specific software) is classified in property, plant and equipment.

More specifically, separately acquired software is initially measured at cost which comprises its purchase price and any directly attributable cost of preparing the software for its intended use, including employee benefits or professional fees. Software acquired as part of a business combination is initially measured at fair value. Both software separately acquired and acquired as part of a business combination is depreciated during its useful life which has been set from 1 to 15 years.

Regarding internally generated software, the Group recognizes an intangible asset when it can demonstrate all of the following at the development phase:

- the technical feasibility of completing the intangible asset so that it will be available for use or sale;
- its intention to complete the intangible asset and use or sell it;
- its ability to use or sell the intangible asset;
- how the intangible asset will generate probable future economic benefits;
- the availability of adequate technical, financial and other resources to complete the development and to use or sell the intangible asset;
- its ability to measure reliably the expenditure attributable to the intangible asset during is development.

Expenditure incurred during the research phase is directly recognized in profit or loss.

Consequently, the cost of an internally generated intangible asset is the sum of expenditure incurred from the date when the intangible asset first meets the above criteria, including employee benefits arising from the generation of the software.

Internally generated software is depreciated, using the straight line method, during its useful life which has been set from 2 to 15 years.

All intangible assets are assessed for impairment when there are triggers for impairment (note 1.2.15).

No residual value is estimated for intangible assets.

In case of sale of an intangible asset as well as when no economic benefits are expected for the Group, the intangible asset is derecognised. When selling the asset, the difference between the sale price and its carrying amount is recognized in profit or loss.

1.2.11 Leases

The Group enters into leases either as a lessee or as a lessor. At inception, the Group assesses whether a contract is or contains a lease. If the contract conveys the right to control the use of an identified asset for a period of time for consideration, then the contract is accounted as a lease.

The lease term is determined as the non-cancellable period of a lease, together with both periods covered by an option to extend the lease if the lessee is reasonably certain to exercise that option and periods covered by an option to terminate the lease if the lessee is reasonably certain not to exercise that option. After lease commencement, upon the occurrence of either a significant event or a significant change in circumstances that is within the control of the lessee, the Group, as a lessee, reassesses the lease term. The Group, either as a lessee or lessor, revises the lease term if there is a change in the non-cancellable period of a lease.

a) When the Group is the lessor

When the risks and rewards incident to ownership of an asset are transferred to the lessee they are classified as finance leases.

All other lease agreements are classified as operating leases.

The accounting treatment followed depends on the classification of the lease, which is as follows:

i. Finance leases:

For finance leases where the Group is the lessor the aggregate amount of lease payments is recognized as loans and advances.

The difference between the present value (net investment) of lease payments and the aggregate amount of lease payments is recognized as unearned finance income and is deducted from loans and advances.

The lease rentals received decrease the aggregate amount of lease payments and finance income is recognized on an accrual basis.

The finance lease receivables are subject to the same impairment testing as applied to customer loans and advances as described in note 1.2.13.

ii. Operating leases:

When the Group is a lessor of assets under operating leases, the leased asset is recognized and depreciation is charged over its estimated useful life. Income arising from the leased asset is recognized as other income on an accrual basis.

b) When the Group is the lessee

The Group, as a lessee, for all leases recognizes a right of use asset and a lease liability at the commencement of the lease. The right of use asset is initially measured at cost, comprising the initial lease liability amount, any initial direct costs and an estimate of the obligation for costs to refurbish the asset, less any lease incentives received.

Right-of use assets are subsequently measured at cost less any accumulated depreciation, any accumulated impairment losses and adjusted for any remeasurement of the lease liability.

Depreciation is charged on a straight line basis from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term. Right-of-use assets are reviewed at each reporting date to determine whether there is an indication of impairment and if they are impaired the carrying amount is adjusted to its recoverable amount with the difference recorded in profit or loss (note 1.2.15).

For short-term leases (lease term of 12 months or less at the commencement date) and leases for which the underlying asset is of low value (less than 5.000 EUR when new) the Group does not recognize a right-of-use asset and a lease liability but instead recognizes the lease payments associated with those leases as an expense on a straight-line basis over the lease term.

The lease liability is initially measured at the present value of lease payments that are not paid at that date, net of cash lease incentives. Lease payments include fixed payments and variable payments that depend on an index (such as an inflation index) or a rate and are discounted using the lessee's incremental borrowing rate. Incremental borrowing rate is determined by using as reference rate Alpha Bank's secured funding rate, adjusted for different currencies and taking into consideration government yield curves, where applicable.

After the commencement date, the Group measures the lease liability by increasing the carrying amount to reflect interest, reducing the carrying amount to reflect lease payments made and remeasuring the carrying amount to reflect any reassessment or lease modifications.

Right of use assets are included within Property, plant and equipment and the lease liability is included in Other liabilities. In cases where the Group is an intermediate lessor in an operating lease, right of use assets recognized for the head lease are included within Investment property while in case the Group is an intermediate lessor in a finance lease right of use asset, or the part of it which is subleased, is derecognized and a finance lease receivable is recognized.

1.2.12 Insurance activities

a) Insurance contracts

An insurance contract is a contract with which significant insurance risk is transferred from the policyholder to the insurance company and the insurance company agrees to compensate the policyholder if a specified uncertain future event affects him adversely. Insurance risk is significant if, and only if an event could force the company to pay significant additional benefits. For the Group, insurance risk is significant when the amount paid in the event of insurance risk exceeds 5% of the total benefit arising from the contract.

b) Distinction of insurance products

In accordance with IFRS 4 contracts that do not transfer significant insurance risk are characterized as investment and/or service contracts, and their accounting treatment is covered by IAS 32 and IFRS 9 for financial instruments and IFRS 15 for revenue.

All types of contracts offered by the Group are classified as insurance life contracts, as they represent individual, traditional insurance contracts that provide earnings participation based on surplus revenue from investment (in relation to the technical interest rate) on the mathematical reserves.

c) Insurance reserves

The insurance reserves are the current estimates of future cash flows arising from insurance life contracts. The reserves consist of:

i. Mathematical reserves

The insurance reserves for the term life contracts (e.g. term, comprehension, investment) are calculated on actuarial principles using the present value of future liabilities less the present value of premiums to be received.

The calculations are based on technical assumptions (mortality tables, interest rates) in accordance with the respective supervisory authorities on the date the contract was signed.

If the carrying amount of the insurance reserves is inadequate, the entire deficiency is provided for.

ii. Outstanding claims reserves

They concern liabilities on claims occurred and reported but not yet paid at the balance sheet date. These claims are determined on a case-by-case basis based on existing information (loss adjustors' reports, court decisions etc) at the balance sheet date.

They include also provisions for claims incurred but not reported at the balance sheet date (IBNR). The calculation of these provisions is based on statistical experience and the estimated average cost of claim.

d) Revenue recognition

Revenue from life insurance contracts is recognized when it becomes payable.

e) Reinsurance

The Group currently does not use reinsurance contracts.

f) Liability adequacy test

In accordance with IFRS 4 an insurer shall assess at each reporting date whether its recognized insurance reserves less deferred acquisition costs are adequate to cover the risk arising from the insurance contracts.

The methodology applied for life insurance products was based on current estimates of all future cash flows from insurance contracts and of related handling costs. These estimates were based on assumptions representing current market conditions and regarding parameters such as mortality, cancellations, future changes and allocation of administrative expenses as well as the discount rate. The guaranteed return included in certain insurance contracts has also been taken into account in estimating cash flows.

If that assessment shows that the carrying amount of its insurance reserves is inadequate, the entire deficiency is recognized against profit or loss.

1.2.13 Credit impairment losses on loans and advances to customers, undrawn loan commitments, letters of credit and letters of guarantee

The Group, at each reporting date, recognizes a loss allowance for expected credit losses on loans and advances to customers not measured at fair value through profit or loss as well as for off-balance sheet exposures (letters of guarantee, letters of credit, undrawn loan commitments).

The loss allowance for loans and off-balance sheet exposures is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the financial asset falls under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized.

a) Default definition

The Group has adopted as default definition non-performing exposures (NPE), as defined in the EBA Guidelines (GL/2016/07), thus harmonizing the definition of default used for financial reporting purposes with the one used for regulatory purposes.

It is noted that from 1.1.2021 default definition is amended as mentioned in note 43.1.

b) Classification of exposures into stages based on credit risk (Staging)

For the purposes of calculating expected credit losses, the exposures are classified into stages as follows:

- Stage 1: Stage 1 includes performing exposures that do not have significant increase in credit risk since initial recognition. Stage 1 also includes exposures for which credit risk has been improved and the exposure has been reclassified from Stages 2 or 3. In this stage, expected credit losses are recognized based on the probability of default within the next twelve months.
- Stage 2: Stage 2 includes performing exposures for which there has been a significant increase in credit risk since initial recognition. Stage 2 also includes exposures for which credit risk has been improved and the exposure has been reclassified from Stage 3. In this stage, lifetime expected credit losses are recognized.
- Stage 3: Stage 3 includes non performing/impaired exposures. In this stage, lifetime expected credit losses are recognized.

As an exception to the above, for purchased or originated credit impaired (POCI) exposures, lifetime expected credit losses are always recognized. Purchased or originated credit impaired exposures include:

- Exposures that at the time of acquisition meet the criteria to be classified as non-performing exposures.
- Exposures for which there has been a change in repayment terms, either due to financial difficulty or not, which resulted in

derecognition and recognition of a new impaired asset (POCI) except when derecognition is due to the change of debtor of a corporate loan in which case the creditworthiness of the new debtor is reassessed.

Especially for exposures affected by the Covid-19 crisis, and as long as suspension installment programs are effective, there are post model adjustments (PMAs) in order to reflect risks and other uncertainties that are not included in the underlying expected credit loss models, taking the following into account:

- The probability of default is the main indicator of the deterioration of an exposure since initial recognition.
- The probability of default models have not been designed to directly integrate current economic conditions.

c) Significant increase in credit risk

In determining significant increase in credit risk of an exposure since initial recognition and the recognition of lifetime expected credit losses instead of 12 months expected credit losses, the Group assesses, at each reporting date, the risk of default compared to the risk of default at initial recognition for all its performing exposures including those with no delinquencies.

The assessment of the significant increase in credit risk is based on the following:

- Quantitative Indicators: refers to the quantitative information used and more specifically to the comparison of the probability of default (PD) between the reporting date and the date of initial recognition.
- Qualitative Indicators: refers to the qualitative information used which is not necessarily reflected in the probability of default, such as the classification of an exposure as forborne performing (FPL, according to EBA ITS). Additional qualitative indicators, both for corporate and retail portfolios are also reflected through the Early Warning indicators where depending on the underlying assessment, an exposure can be considered to have a significant increase in credit risk or not. Especially for special lending portfolio, additional qualitative indicators are captured through slotting category.
- Backstop Indicators: in addition to the above, and in order to capture cases for which there are no triggers reflecting the increase in credit risk, based on qualitative and quantitative indicators, the 30 days past due indicator is used as a backstop.

d) Calculation of expected credit loss

The measurement of expected credit losses is made as follows:

- For financial assets, a credit loss is the present value of the difference between:

  (a) the contractual cash flows and

  (b) the cash flows that the Group expects to receive
- For undrawn loan commitments, a credit loss is the present value of the difference between:

  (a) the contractual cash flows that are due if the holder of the loan commitment draws down the loan; and

  (b) the cash flows that the Group expects to receive if the loan is drawn down.
- For letters of guarantee and letters of credit, the loss is equal to the expected payments to reimburse the holder for a credit loss that it incurs less any amounts that the Group expects to receive from the holder.

For present value calculation, original effective interest rate is used as a discount rate. Especially for POCI assets credit-adjusted effective interest rate is used.

The Group calculates impairment losses either on a collective (collective assessment) or on an individual basis (individual assessment), taking into account the significance of an exposure or the borrower's limit. In addition, exposures that do not have common credit risk characteristics or for which there are no sufficient historical behavioral data are assessed on an individual basis.The Group calculates expected credit losses based on the weighted probability of three scenarios. More specifically, the Economic Research Division produces forecasts for the possible evolution of macroeconomic variables that affect the level of expected credit losses of loan portfolios under a baseline and under alternative macroeconomic scenarios and also generates the cumulative probabilities associated with these scenarios.

The mechanism for calculating expected credit loss is based on the following credit risk parameters:

- Probability of Default (PD): It is an estimate of the probability of a debtor to default over a specific time horizon.
- Exposure at default (EAD): Exposure at Default is an estimate of the amount of the exposure at the time of the default taking

into account: (a) expected changes in the exposure after the reporting date, including principal and interest payments; (b) the expected use of credit limits and (c) accrued interest. The approved credit limits that have not been fully disbursed represent a potential credit exposure and are converted into a credit exposure equal to the approved undrawn loan commitment multiplied by a Credit Conversion Factor (CCF). The Credit Conversion factor of credit exposure is calculated based on statistical models.

- Loss given default (LGD): Loss given default is an estimate of the loss that will occur if the default occurs at a given time. It is based on the difference between the contractual cash flows due and those expected to be received, including the liquidation of collaterals and cure rate.

e) Measurement of expected credit losses on receivables from customers

Receivables from customers are derived from the Group's commercial, other than loan, activity. The loss allowance for receivables from customers is measured at an amount equal to the lifetime expected credit losses (there is no stage allocation) based on the simplified approach provided by IFRS 9.

f) Presentation of expected credit losses in financial statements

Loss allowances for expected credit losses are presented in the Balance Sheet as follows:

- Financial assets measured at amortised cost and finance lease receivables: loss allowance is presented as a deduction from the gross carrying amount of the assets.
- Financial assets measured at fair value through other comprehensive income: for those assets no loss allowance is recognized in the Balance Sheet, however, its amount is disclosed in the notes to the financial statements.
- Letters of credit/letters of guarantee: loss allowance is recognized in line "Provisions" of liabilities in Balance Sheet.
- Undrawn loan commitments: When there is not also a loan, loss allowance is recognized in line "Provisions" of liabilities in Balance Sheet. If a financial asset includes both a loan and an undrawn loan commitment, the accumulated expected credit losses of the loan commitment are presented together with the accumulated expected credit losses of the loan, as a deduction from its gross carrying amount. To the extent that the combined expected credit losses exceed the gross carrying amount of the loan, the expected credit losses are recognized in line "Provisions" of liabilities in Balance Sheet.

The amount of expected credit losses for the period is presented in the caption "Impairment losses and provisions to cover credit risk". In the same caption the following are also recognized: recoveries from written-off loans measured at amortised cost or at fair value through other comprehensive income, modification gains or losses of loans measured at amortised cost or at fair value through other comprehensive income and the favourable changes in expected credit losses of POCI assets in case expected credit losses are less than the amount of expected credit losses included in the estimated cash flows on initial recognition.

g) Write-offs

The Group proceeds with the write-off of loans and advances to customers when it has no reasonable expectations for their recovery. In this case, the loss allowance is used against the carrying amount of the financial asset. Write-off is an event of derecognition.

1.2.14 Credit impairment losses on due from banks and bonds

The Group, at each reporting date, recognizes a loss allowance for expected credit losses on due from banks and bonds not measured at fair value through profit or loss.

The loss allowance is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the financial asset falls under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized.

a) Default definition

Due from banks and bonds are considered impaired when the external rating of the issuer/counterparty is equivalent to default (D). In case there is no external rating, then the instrument is characterized as impaired based on internal rating. If there is also an exposure to the corporate issuer/counterparty to the loan portfolio which has been classified as impaired, the instrument is also characterized as impaired.

b) Classification of due from banks and bonds into stages based on credit risk (Staging)

For the purposes of calculating expected credit losses, the exposures are classified into stages as follows:

- Stage 1: Stage 1 includes non impaired instruments that do not have significant increase in credit risk since initial recognition. Stage 1 also includes instruments for which credit risk has been improved and the instrument has been reclassified from Stages 2 or 3. In this stage, expected credit losses are recognized based on the probability of default within the next twelve months.
- Stage 2: Stage 2 includes non impaired instruments for which there has been a significant increase in credit risk since initial recognition. Stage 2 also includes instruments for which credit risk has been improved and the instrument has been reclassified from Stage 3. In this stage, lifetime expected credit losses are recognized.
- Stage 3: Stage 3 includes impaired instruments. In this stage, lifetime expected credit losses are recognized.

As an exception to the above, for purchased or originated credit impaired (POCI) instruments, lifetime expected credit losses are always recognized. An instrument is characterized as purchased or originated credit impaired when:

- The instrument (or the issuer) has an external rating that corresponds to default at the time of acquisition
- Corporate bonds resulting from debt restructuring are classified as purchased or originated credit impaired, based on the guidelines applicable to the loan portfolio.

When a debt security has been purchased at a large discount and does not fall into any of the categories mentioned above, the Group examines the transaction in detail (transaction price, recovery rate, issuer's financial condition at the time of purchase, etc.) in order to determine whether it should be recognised as purchased or originated credit-impaired (POCI). Classification in this category requires documentation and approval by the relevant committees of the Group.

c) Significant increase in credit risk

The classification into stages for the purpose of expected credit loss measurement is based on the credit rating of rating agencies or, for corporate securities issued by Greek issuers for which there is also an exposure in loan portfolio, on the issuer's internal rating.

The Group defines as low credit risk all investment grade securities, which are classified in Stage 1.

The determination of significant increase in credit risk for non-investment grade securities is based on the following two conditions:

- Downgrade in the issuer / counterparty's credit rating on the reporting dates compared to the credit rating on the date of the initial recognition.
- Increase in the probability of default of the issuer / counterparty for the 12-month period compared to the corresponding probability of default at initial recognition.

Additionally, the Group monitors the change in the credit spread since initial recognition. A change in credit spread at the reporting date that exceeds a specific threshold compared to the credit margin prevailing at the date of initial recognition is a trigger for reviewing the securities classification stage.

d) Calculation of expected credit loss

The expected credit loss is the present value of the difference between:

(a) the contractual cash flows and

(b) the cash flows that the Group expects to receive

For present value calculation, original effective interest rate is used as a discount rate. Especially for POCI assets credit-adjusted effective interest rate is used.

For the calculation of the expected credit loss, the following parameters are used:

- Probability of default (PD): the probability of default over the next 12 months is used to calculate the expected credit loss for 12 months, and the probability of default over the life of the instrument is used to calculate the lifetime expected credit losses.

- Exposure at default (EAD): In the case of securities, the Group estimates the future unamortised cost in order to calculate the EAD. In particular, for each period, EAD is the maximum loss that would result from issuer / counterparty potential default.
- Loss given default (LGD) is the percentage of the total exposure that the Group estimates as unlikely to recover at the time of the default. The Group distinguishes sovereigns from non-sovereign issuers / counterparties as regards to the LGD estimation. In case the Group has also granted a loan to the issuer / counterparty of the security, the estimated LGD is aligned to corresponding estimate for the loan portfolio (taking into account any potential collaterals the loan portfolio is likely to have against the unsecured debt securities).

e) Presentation of expected credit losses in financial statements

Loss allowances for expected credit losses are presented in the Balance Sheet as follows:

- Financial assets measured at amortised cost: loss allowance is presented as a deduction from the gross carrying amount of the assets.
- Financial assets measured at fair value through other comprehensive income: for those assets no loss allowance is recognized in the Balance Sheet, however, its amount is disclosed in the notes to the financial statements.

The amount of expected credit losses for the period is presented in the caption “Impairment losses and provisions to cover credit risk”. The caption includes also the favourable changes in expected credit losses of POCI assets in case expected credit losses are less than the amount of expected credit losses included in the estimated cash flows on initial recognition.

1.2.15 Impairment losses on investments and non-financial assets

The Group assess as at each balance sheet date its investments in associates and joint ventures as well as non-financial assets for impairment, particularly, right of use assets, goodwill and other intangible assets and at least annually property, plant and equipment and investment property.

In assessing whether there is an indication that an asset may be impaired both external and internal sources of information are considered, of which the following are indicatively mentioned:

- The asset’s market value has declined significantly, more than would be expected as a result of the passage of time or normal use.
- Significant changes with an adverse effect have taken place during the period or will take place in the near future, in the technological, economic or legal environment in which the entity operates or in the market to which the asset is dedicated.
- Significant unfavorable changes in foreign exchange rates.
- Market interest rates or other rates of return of investments have increased during the period, and those increases are likely to affect the discount rate used in calculating an asset’s value in use.
- The carrying amount of the net assets of the entity is greater than its market capitalization.
- Evidence is available of obsolescence or physical damage of an asset.

Specifically for right of use assets, triggers for impairment include:

- The existence of leased properties that are neither used nor leased by the Group.
- The fact that the present value of the leases received in the event of a sublease is lower than the value of the rents paid under the lease.

An impairment loss is recognized in profit or loss when the recoverable amount of an asset is less than its carrying amount. The recoverable amount of an asset is the higher of its fair value less costs to sell and its value in use.

Fair value less costs to sell is the amount received from the sale of an asset (less the cost of disposal) in an orderly transaction between market participants.

Value in use is the present value of the future cash flows expected to be derived from an asset or cash –generating unit through their use and not from their disposal.

For the valuation of property, plant and equipment, the calculation of the recoverable amount includes all improvements which render the asset perfectly suitable for its use by the Group. In this way, the market participant's ability to generate economic benefits by using the asset in it's highest and best use or by selling it to another market participant that would use the asset in its highest and best use is taken into account.

1.2.16 Income tax

Income tax consists of current and deferred tax.

Current tax for a period includes the expected amount of income tax payable in respect of the taxable profit for the current reporting period, based on the tax rates enacted at the balance sheet date.

Deferred tax is the tax that will be paid or for which relief will be obtained in future periods and it is calculated based on the temporary differences between the tax base of assets and liabilities and their respective carrying amounts in the financial statements.

Deferred tax assets and liabilities are calculated using the tax rates that are expected to apply when the temporary difference reverses, based on the tax rates (and laws) enacted at the balance sheet date.

A deferred tax asset is recognized to the extent that it is probable that future taxable profits will be available against which the asset can be utilized.

In addition, deferred tax assets are not recognized from the initial recognition of an asset or liability in a transaction that is not a business combination and at the time it takes place affects neither accounting profit nor taxable profit.

Furthermore, regarding investments in associates and joint ventures, deferred tax assets are recognized only when it is probable that the temporary difference will reverse in the foreseeable future and taxable profit will be available against which the temporary difference can be utilized.

Income tax, both current and deferred, is recognized in profit or loss except when it relates to items recognized directly in equity. In such cases, the respective income tax is also recognized in equity.

1.2.17 Non-current assets held for sale

Non-current assets or disposal groups that are expected to be recovered principally through a sale transaction, along with the related liabilities, are classified as held-for-sale.

The above classification is used if the asset is available for immediate sale in its present condition and its sale is highly probable. The sale is considered highly probable when it has been decided by the competent bodies of the Management, an active programme to locate a buyer has been initiated, the asset is actively marketed for sale at a price which is reasonable in relation to its current fair value and the sale is expected to be completed within one year. Non-current assets that are acquired exclusively with a view to their subsequent disposal are classified as held for sale at the acquisition date when the one-year requirement is met and it is highly probable that the remaining criteria will be met within a short period following the acquisition (usually within three months).

Before their classification as held for sale, the assets are remeasured in accordance with the respective accounting standard.

Assets held for sale are initially recognised and subsequently remeasured at each balance sheet date at the lower of their carrying amount and fair value less cost to sell. Any loss arising from the above measurement is recorded in profit or loss and can be reversed in the future. In this case, the gain from any subsequent increase in fair value less costs to sell cannot exceed the cumulative impairment losses that have been recognized. When the loss relates to a disposal group it is allocated to assets within the disposal group with the exception of specific assets that are not within the scope of IFRS 5. The impairment loss on a disposal group is first allocated to goodwill and then to the remaining assets and liabilities on a pro-rata basis.

Assets in this category are not depreciated.

Gains or losses from the sale of these assets are recognized in the income statement.

Non-current assets held for sale, that the Group subsequently decides either to use or to lease, are reclassified to the categories of property, plant and equipment or investment property respectively. During their reclassification, they are measured at the lower of their recoverable amount and their carrying amount before they were classified as held for sale, adjusted for any depreciation, amortization or revaluation that would have been recognized had the assets not been classified as held for sale.

Non - current assets that the Group intends to sell but which are not available for immediate sale or are not expected to be sold within a year are included in Other Assets and are measured at the lower of cost (or carrying amount) and net realizable value in accordance with IAS 2. Net realizable value is considered equal to fair value less cost to sell.

1.2.18 Defined contribution and defined benefit plans

The Group has both defined benefit and defined contribution plans.

A defined contribution plan is where the Group pays fixed contributions into a separate entity and the Group has no legal or constructive obligation to pay further contributions if the fund does not have sufficient assets to pay all employees the benefits relating to employee service in current or prior years. The contributions are recognized as employee benefit expense on an accrual basis. Prepaid contributions are recognized as an asset to the extent that a cash refund or a reduction in the future payments is available.

A defined benefit plan is a pension plan that defines an amount of pension benefit that an employee will receive on retirement which is dependent, among others, on years of service and salary on date of retirement and it is guaranteed by the entity of the Group.

The defined benefit obligation is calculated, separately for each plan, based on an actuarial valuation performed by independent actuaries using the projected unit credit method.

The net liability recognized in the consolidated financial statements is the present value of the defined benefit obligation (which is the expected future payments required to settle the obligation resulting from employee service in the current and prior periods) less the fair value of plan assets. The amount determined by the above comparison may be negative, an asset. The amount of the asset recognised in the financial statements cannot exceed the total of the present value of any economic benefits available to the Group in the form of refunds from the plan or reductions in future contributions to the plan.

The present value of the defined benefit obligation is calculated based on the return of high quality corporate bonds with a corresponding maturity to that of the obligation, or based on the return of government bonds in cases when there in no deep market in corporate bonds.

Interest on the net defined benefit liability (asset), which is recognised in profit or loss, is determined by multiplying the net defined benefit liability (asset) by the discount rate used to discount post-employment benefit obligation, as determined at the start of the annual reporting period, taking into account any changes in the net defined benefit liability (asset).

Service cost, which is also recognised in profit or loss, consists of:

- Current service cost, which is the increase in the present value of the defined benefit obligation resulting from employee service in the current period;
- Past service cost, which is the change in the present value of the defined benefit obligation for employee service in prior periods, resulting from the introduction or withdrawal of, or changes to, a defined benefit plan or a curtailment (a significant reduction by the entity in the number of employees covered by a plan) and
- Any gain or loss on settlement.

Before determining past service cost or a gain or loss on settlement, the Group remeasures the net defined benefit liability (asset) using the current fair value of plan assets and current actuarial assumptions, reflecting the benefits offered under the plan before its amendment, curtailment or settlement.

Past service cost, in particular, is directly recognized to profit or loss at the earliest of the following dates

- When the plan amendment or curtailment occurs and
- When the Group recognizes related restructuring costs (according to IAS 37) or termination benefits.

Likewise, the Group recognizes a gain or loss on the settlement when the settlement occurs.

Remeasurements of the net defined benefit liability (asset) which comprise:

- actuarial gains and losses;
- return on plan assets, excluding amounts included in net interest on the net defined benefit liability (asset); and
- any change in the effect of the limitation in the asset recognition, excluding amounts included in net interest on the net defined benefit liability (asset),

are recognized directly in other comprehensive income and are not reclassified in profit or loss in a subsequent period.

Finally, when the Group decides to terminate the employment before retirement or the employee accepts the Group's offer of benefits in exchange for termination of employment, the liability and the relative expense for termination benefits are recognized at the earlier of the following dates:

a. when the Group can no longer withdraw the offer of those benefits; and

b. when the Group recognizes restructuring costs which involve the payment of termination benefits.

1.2.19 Share options granted to employees

The granting of share options to the employees, their exact number, the price and the exercise date are decided by the Board of Directors in accordance with the Shareholders' Meeting approvals and after taking into account the current legal framework.

The fair value calculated at grant date is recognized during the servicing period and recorded in staff costs with an increase of a reserve in equity respectively. When there are no vesting conditions, it is considered that services have been received. On the contrary, when there are service vesting conditions the expense is recognized as the relative services are received. The amount paid by the beneficiaries of share options on the exercise date increases the share capital of the Group and the reserve in equity from the previously recognized fair value of the exercised options is transferred to share premium. The reserve in equity from the previously recognized fair value of the unexercised options is transferred to retained earnings.

1.2.20 Provisions and contingent liabilities

A provision is recognized if, as a result of a past event, the Group has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation.

Provisions are, also, recognized in cases of restructuring plans with which management attempts either to change the subject of a corporate activity or the manner in which it is conducted (e.g. close down business locations). The recognition of provision is accompanied with the relevant, authorized by the Management, program and with the suitable actions of disclosure. A restructuring provision includes only the direct expenditures arising from the restructuring, which are those that are both necessarily entailed by the restructurings and not associated with the ongoing activity of the Group.

The amount recognized as a provision shall be the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. Where the effect of the time value of money is material, the amount of the provision is equal to the present value of the expenditures expected to settle the obligation.

Amounts paid for the settlement of an obligation are set against the original provisions for these obligations. Provisions are reviewed at the end of each reporting period.

If it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed. Additionally, provisions are not recognized for future operating losses.

Future events that may affect the amount required to settle the obligation, for which a provision has been recognized, are taken into account when sufficient objective evidence exists that they will occur.

Reimbursements from third parties relating to a portion of or all of the estimated cash outflow are recognized as assets, only when it is virtually certain that they will be received. The amount recognized for the reimbursement does exceed the amount of the provision. The expense recognized in profit or loss relating to the provision is presented net of the amount of the reimbursement.

The Group does not recognize in the statement of financial position contingent liabilities which relate to:

- possible obligations resulting from past events whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Group, or
- present obligations resulting from past events for which:

- it is not probable that an outflow of resources will be required, or
- the amount of liability cannot be measured reliably.

The Group provides disclosures for contingent liabilities taking into consideration their materiality.

1.2.21 Securities sale and repurchase agreements and securities lending

The Group enters into purchases of securities under agreements to resell at a certain date in the future at a fixed price (reverse repos). Securities purchased subject to commitments to resell them at future dates are not recognized in the balance sheet.

The amounts paid, including interest accruals, are recognized in loans and advances to either banks or customers. The difference between the purchase price and the resale price is recognized as interest income using effective interest method.

Similarly, securities that are sold under agreements to repurchase (repos) are not derecognized but they continue to be measured in accordance with the accounting policy of the category that they have been classified.

The proceeds from the sale of the securities are reported as liabilities to either banks or customers. The difference between the sales price and the repurchase price is recognized as interest expense using effective interest method.

Securities borrowed by the Group under securities lending agreements are not recognized in the consolidated balance sheet except when they have been sold to third parties whereby the liability to deliver the security is recognized and measured at fair value.

1.2.22 Securitization

The Group securitises financial assets by transferring these assets to special purpose entities, which in turn issue bonds.

In each securitization of financial assets the assessment of control of the special purpose entity is considered, based on the circumstances mentioned in note 1.2.1, so as to examine whether it should be consolidated. In addition, the contractual terms and the economic substance of transactions are considered, in order to decide whether the Group should proceed with the derecognition of the securitised financial assets, as referred in note 1.2.5.

1.2.23 Equity

Distinction between debt and equity

Financial instruments issued by Group companies to obtain funding are classified as equity when, based on the substance of the transaction, the Group does not undertake a contractual obligation to deliver cash or another financial asset or to exchange financial instruments under conditions that are potentially unfavorable to the issuer.

In cases when Group companies are required to issue equity instruments in exchange for the funding obtained, the number of equity instruments must be fixed and determined on the initial contract, in order for the obligation to be classified as equity.

In the context of the above assessment, hybrid securities issued by the Group entity Alpha Group Jersey Ltd were classified within the equity of the Group.

Incremental costs of share capital increase

Incremental costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from retained earnings.

Share premium

Share premium includes the difference between the nominal value of the shares and the consideration received in the case of a share capital increase.

It also includes the difference between the nominal value of the shares issued and their market value, in cases of exchanges of shares as consideration for the acquisition of a business by the Group.

Treasury shares

The cost of acquiring treasury shares is recognized as a reduction of equity. Subsequent gains or losses from the sale of treasury shares, after deducting all direct costs and taxes, are recognized directly in retained earnings.

Dividends

Dividends are deducted from retained earnings and recorded as a liability in the period that the dividend is approved by the Shareholders in General Meeting.

1.2.24 Interest income and expense

Interest income and expense is recognized in the income statement for all interest bearing financial assets and liabilities.

Interest income and expense is recognised on an accrual basis and measured using the effective interest method, with the exception of derivatives as described in detail in note 1.2.6. Especially for POCI assets, interest income is calculated using credit-adjusted effective interest rate.

Effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial asset or financial liability to the gross carrying amount of a financial asset or to the amortised cost of a financial liability. When calculating the effective interest rate, the Group estimates the expected cash flows by considering all the contractual terms of the financial instrument but does not consider the expected credit losses. The calculation includes all fees and points paid or received between parties to the contract that are an integral part of the effective interest rate.

For financial assets, in particular, the following apply:

- For those financial assets classified within Stage 1 or Stage 2 for the purpose of expected credit losses measurement, interest income is calculated by applying effective interest rate to the gross carrying amount of the asset.
- For those financial assets classified within Stage 3 for the purpose of expected credit losses measurement, interest income is calculated by applying the effective interest rate to the amortised cost of the asset.
- For purchased or originated credit impaired financial assets interest income is calculated by applying the credit-adjusted effective interest rate to the amortised cost of the asset.

In case of negative interest rates, interest is presented within interest income for interest bearing financial liabilities and within interest expense for interest bearing financial assets.

Borrowing costs that are directly attributable to assets that require a substantial period of time to get ready for their intended use or sale are capitalized as part of the cost of the asset. Capitalisation ceases when substantially all the activities necessary to prepare the asset for its intended use are complete.

1.2.25 Fee and commission income

Fees and commission income from contracts with customers are recognized based on the consideration specified in the contract when the Group satisfies the performance obligation by transferring the service to the customer. With the exception of specific portfolio management fees which are calculated on the basis of the size and performance of the portfolio, the services provided have a fixed price. Variable portfolio management fees are recognized when all related uncertainties are resolved.

For commissions on services provided over time, revenue is recognized as the service is being provided to the customer, such as commissions to provide account management services, fees for administration of syndicated loans, fees for portfolio management and investment services advice as well as management fees and fees for collection of receivables.

For transaction-based fees, the execution and completion of the transaction executed signals the point in time, in which the service is transferred to the customer and the revenue is recognized, such as currency transactions, purchases / sales of securities as well as issue and disposal of syndicated loans and bonds.

Transaction revenues relating to the recognition of a financial instrument not measured at fair value through profit or loss are capitalized and amortised in the income statement using the effective interest method over the life of the financial instrument and included in interest income.

1.2.26 Dividend Income

Dividend income from investments in shares is recognised in the income statement when the dividend distribution is approved by the appropriate body of the company that the Group has invested in.

1.2.27 Gains less losses on financial transactions

Gains less losses on financial transactions include:

- fair value changes of financial assets and liabilities,
- gains and losses arising from the modification of the contractual terms of financial assets measured at fair value through profit or loss,
- gains and losses arising from the derecognition of financial assets and liabilities due to early repayment, including conversion of loans into shares, disposal or significant modification of the contractual terms, except for gains and losses arising from the derecognition of financial assets measured at amortised cost which are recognized in a separate line item of the Income Statement,
- gains and losses arising from the impairment or disposal of Group entities that have not been classified as discontinued operations,
- exchange differences arising from the translation of financial instruments denominated in foreign currencies.

1.2.28 Gains less losses on derecognition of financial assets measured at amortised cost

Gains less losses on derecognition of financial assets measured at amortised cost include:

- Gains and losses from the derecognition of financial assets measured at amortised cost
- The difference, at initial recognition, between the nominal and the fair value of a financial asset measured at amortised cost that is the result of the derecognition of another financial asset due to significant modification of its contractual terms.

1.2.29 Discontinued operations

A discontinued operation is a component of the Group that either has been disposed of, or has been classified as held for sale and represents:

- a major line of Group's business; or
- a geographical area of operations; or
- a subsidiary acquired exclusively with a view to resale.

The assets and liabilities of discontinued operations are presented separately from other assets and liabilities in the balance sheet and are not offset.

Any cumulative income or expense recognized directly in equity relating to a discontinued operation is presented separately (as a separate line in equity).

The profit or loss after tax from discontinued operations and any losses recognized on the measurement to fair value less costs to sell of the disposal group are presented in a separate line in the face of the income statement after net profit from continuing operations.

The comparative financial statements are restated only for the income statement and the cash flow statement.

1.2.30 Related parties definition

According to IAS 24, a related party is a person or entity that is related to the entity that is preparing its financial statements. For the Group, in particular, related parties are considered:

a. An entity that constitutes for the Group:
   i) a joint venture and
   ii) an associate
b. A person or an entity that have control, or joint control, or significant influence over the Group.

   This category includes Hellenic Financial Stability Fund and its subsidiaries because, in the context of the L.3864/2010, the HFSF participates in the Board of Directors and in significant committees of the Bank and as a result is considered to have significant influence over the Group.

c. A person and his close family members, if that person is a member of the key management personnel.

The Group considers as key management personnel all the members of the Bank's Board of Directors and of the Bank's Executive Committee while as their close family members it considers their children and spouses or domestic partners and their dependants and the dependants of their spouses or domestic partners.

Related parties are also considered the entities controlled or jointly controlled by the above mentioned persons and more specifically the entities in which the above persons participate with more than 20%.

1.2.31 Comparatives

To the extent considered necessary the comparatives have been adjusted to facilitate changes in presentation of the current year amounts.

1.3 Significant accounting judgments and key sources of estimation uncertainty

Significant accounting judgments

The Group, in the context of applying accounting policies, makes judgments that may affect the amounts recognized in the financial statements. Those judgements relate to the following:

Assessment of whether contractual cash flows of a debt financial instrument represent solely payments of principal and interest on the principal amount outstanding (SPPI) (note 1.2.5)

The Group, at initial recognition of a debt financial asset, assesses whether cash flows are solely payments of principal and interest on the principal amount outstanding. The assessment requires judgement mainly on:

- Whether contractual terms that affect the performance of the instrument relate solely to credit risk, other basic lending risks and profit margin.
- For loans in special purpose entities, whether there is a non-recourse feature. The assessment is based on specific index thresholds as well as on the evaluation of the adequacy of equity and of the collaterals that are not related to the asset being financed.
- Whether in case of prepayment or extension the compensation received is considered fair.

Significant judgements relating to the selection of methodologies and models for expected credit losses calculation (note 43.1)

The Group, in the context of the application of its accounting policies for the measurement of the expected credit losses makes judgments in order to identify:

- the criteria that indicate a significant increase in credit risk,
- the choice of appropriate methodologies for expected credit loss calculation (expected credit loss calculation on an individual or on a collective basis),
- the choice and development of appropriate models used to calculate the exposure at default by financial instrument category (EAD), the probability of default (PD), the estimated expected credit loss at the time of default (LGD), the probability of forbearance (PF) and the choice of appropriate parameters and economic forecasts used in them,
- the choice of the parameters of the macroeconomic forecasts used in the models to determine the expected life and the date of initial recognition of revolving exposures,
- the grouping of financial assets based on similar credit risk characteristics.

Applying different judgments could significantly affect the number of financial instruments classified in stage 2 or significantly differentiate expected credit loss.

Significant judgements regarding moratoria and state guarantee in the context of the pandemic Covid-19 (note 43.1)

The Group applied below accounting treatment for moratoria in the context of pandemic and state guarantee:

- Moratoria were treated as modifications of current contractual terms and they did not lead to the derecognition of initial loans.
- Moratoria were not automatically considered as forbearances or that they lead to default.
- Lifetime expected credit losses were calculated for current retail credit exposures which were subject to payment suspension programs and which were classified in high credit risk areas since they were classified within stage 2, as a result of a relative quality assessment for credit risk increase.
- Temporary short-term facilities related to retail credit exposures which came out from payment suspension programs and which, according to the individual assessment carried out, concerned viable customers who were experiencing a temporary liquidity problem, with no signs of permanent financial difficulty, were classified within stage 2 and lifetime expected credit losses were calculated.
- The cure rate for customers that were already under modification terms was not changed for as long as the moratoria are effective.
- State guarantee was considered an integral part of the loan contract and was taken into account for the expected credit loss calculation of loans.

Income Tax (notes 13 and 39)

The recognition of assets and liabilities for current and deferred tax is affected by factors such as the practical implementation of the relevant legislation and the settlement of disputes that might exist with tax authorities etc. Future tax audits and changes in tax legislation may result in the adjustment of the amount of assets and liabilities for current and deferred tax and in tax payments other than those recognized in the financial statements of the Group.

Classification of non-current assets held for sale (note 48, 51)

The Group classifies non-current assets or disposal groups that are expected to be recovered principally through a sale transaction, along with the related liabilities, as held-for-sale when the asset is available for immediate sale in its present condition and its sale is highly probable to be completed within one year. The assessment of whether the above criteria are met requires judgment mainly as to whether the sale is likely to be completed within one year from the reporting date. In the context of this assessment, the Group takes into account the receipt of the required approvals (both regulatory and those given by the General Meeting and the Committees of the Group), the receipt of offers (binding or note) and the singing of agreements as well as of any conditions included in them.

Based on the above, with a reference date as at 31.12.2020, the possibility of classifying the loans securitized under Galaxy transaction (note 51) as held for sale was assessed. However, taking into account that the completion of the sale of bonds issued under the securitization requires the fulfillment of certain conditions, it was assessed that the completion of the sale within one year cannot be considered certain and therefore these loans were not classified as held for sale. The main pending conditions to be met for the completion of the bond sale transaction that will lead to the derecognition of the loans are the following:

- Approval for the Hive Down by the General Meeting of shareholders of the Bank;
- Approval for the Hive Down by the Single Supervisory Mechanism (SSM) and granting thereby of a new banking license for the Good Bank;
- Approval for the acquisition by a new investor of a qualifying holding in Cepal by Bank of Greece; The acquisition of Cepal from a third investor is part of the strategic plan of the Bank, as mentioned in note 51, as it will take over the servicing of the loan portfolio;
- Approval or clearance by the competent Competition Commission of the acquisition by a new investor of a qualifying holding in Cepal;
- Issuance by Ministry of Development of ministerial decision for the granting by the Hellenic Republic of its guarantee for the Senior notes of the securitization transaction under the “Hercules Program”. A minimum rating of the Senior notes as BB- has been determined as a prerequisite for the receipt of the guarantee;
- Receipt of Single Supervisory Mechanism (SSM) confirmation that the completion of the transaction will result to the Significant Risk Transfer (SRT) in relation to the NPE Portfolios.

At each reporting date, the Group will re-evaluate the degree of fulfillment of the above conditions in order to decide the classification of loans securitized under Galaxy transaction.

Key sources of estimation uncertainty

Key sources of estimation uncertainty used by the Group in the context of applying its accounting principles and which have a significant impact on the amounts recognized in the financial statements are presented below:

Fair value of assets and liabilities (notes 22, 23, 26, 43.4, 48)

For assets and liabilities traded in active markets, the determination of their fair value is based on quoted, market prices. In all other cases the determination of fair value is based on valuation techniques that use observable market data to the greatest extent possible. In cases where there is no observable market data, the fair value is determined using data that are based on internal estimates and assumptions i.e. determination of expected cash flows, discount rates, prepayment probabilities or potential counterparty default.

Estimates included in the calculation of expected credit losses (note 43.1)

The measurement of expected credit losses requires the use of complex models and significant estimates of future economic conditions and credit behavior, taking into account the events that have occurred until reporting date. The significant estimates relate to:

- the determination of the alternative macroeconomic scenarios and the cumulative probabilities associated with these scenarios,
- the probability of default during a specific time period based on historical data, the assumptions and estimates for the future,
- the probability of forbearance for retail portfolios,
- the determination of the expected cash flows and the flows from the liquidation of collaterals,
- the determination of the adjustments to the expected credit loss models and
- the integration of loan portfolio sales scenarios taking into account on the one hand any factors that may hinder the realization of the sale and on the other hand the level of satisfaction of the conditions for the completion of the sale.

In this context, for the calculation of the expected credit losses of securitized loans of Galaxy transaction, expected flows from the sale were not taken into account since, as mentioned above, there are several conditions that must be met in order to complete the sale of the bonds issued under the loans securitization, which on the one hand create a significant uncertainty as to the completion of the transaction and on the other hand do not create a reasonable base for the calculation of the probability of the sale completion.

It is also noted that due to the pandemic Covid-19:

- In order to assess the impact of the pandemic on borrower's cash flows, adjustments have been applied for expected losses for exposures that are individually assessed depending on the business sector of the borrower.
- Due to delays expected to the liquidation of collaterals, the assumed time of repossession of collaterals increased by one year, as compared to 31.12.2019, for both exposures that are assessed collectively and for those that are assessed individually and for which the recovery is not based on cash flows from operating activity (gone concern).

Impairment losses on investments in associates and joint ventures and on non - financial assets (notes 21, 22 and 23)

The Group, at each reporting date, assesses for impairment non – financial assets, and in particular, right-of-use assets, goodwill and other intangible assets, as well as its investments in associates and joint ventures and at least on an annual basis property, plant and equipment and investment property. Internal estimates are used to a significant degree to determine the recoverable amount of the assets, i.e. the higher between the fair value less costs to sell and value in use.

Employee defined benefit obligations (note 31)

Defined benefit obligations are estimated based on actuarial valuations, which are mainly conducted on an annual basis, that incorporate assumptions regarding discount rates, future changes in salaries and pensions, as well as the return on any plan assets. Any change in these assumptions will affect the amount of obligations recognized.

Provisions (note 33)

The amounts recognized by the Group in its financial statements as provisions are derived from the best estimate of the outflow required to settle the present obligation. This estimate is determined by Management after taking into account experience from relevant transactions and in some cases expert reports. In case the amount recognized as a provision is affected by a variety of factors, its calculation is based on the weighting of all possible results. At each balance sheet date, provisions are revised to reflect current best estimates of the obligation.

Recoverability of deferred tax assets (notes 13 and 25)

The Group recognizes deferred tax assets to the extent that it is probable that it will have sufficient future taxable profit available, against which, deductible temporary differences and tax losses carried forward can be utilized. The estimation of future taxable profits is based on forecasts for the development of the accounting results, as these are formulated in accordance with the business plan of the Group. In particular, the business plan includes actions aimed at enhancing profitability through:

- the reduction of the amount of non-performing exposures, based on the plan submitted to the Single Supervisory Mechanism (SSM),
- further reduction of operating costs,
- interest income increase through targeted financing of business segments,
- increase in commission income from services and products offered to individuals and corporates and
- the active management of the sources and the financing costs of the Group.

The main categories of deferred tax assets which have been recognized by the Group relate to losses from the Greek government bonds exchange program (PSI) and the December 2012 Greek government bond buyback program and to deductible temporary differences arising from loans' impairment.

Deferred tax assets associated with tax losses incurred by the PSI and the participation of the Bank in the December 2012 Greek government bond buyback program were recognized as a "debit difference" according to Law 4046/14.2.2012, Law 4110/23.1.2013 and a respective legal opinion. According to Law 4110/23.1.2013 the "debit difference" is deductible for tax purposes, gradually in equal installments, within 30 years, a fact which, according to the Group's estimation, provides a sufficient time period for its gradual utilization against taxable profits.

Regarding the temporary differences arising from loans' impairment, there are no time constraints concerning their recovery, as is the case for the other deferred tax assets categories. The Group assessed their recoverability based on estimates for future taxable profits, as these are forecasted on the basis of the aforementioned business plan. In order to assess deferred tax asset recoverability, the Group's business plan was extended for a limited number of years.

In addition, tax losses resulting from the write-down of debts and the sale of loans, as specifically mentioned in note 13, are recognized as a debit difference. In this context, during the period a significant amount of this kind of debit difference was recognized due to the securitization of loans under Galaxy transaction. It is noted that the debit difference is recognized gradually and equally over a period of 20 years, a fact which in accordance with Group's estimations provides sufficient time for offsetting against taxable profits.

The Group, based on the above, estimates that the total deferred tax assets recognized and that relate to temporary differences and to tax losses carried forward is recoverable.

In addition, and regardless of the assessment of the recoverability of deferred tax assets that is carried out based on what is mentioned above, Law 4303/2014 provides that in case that the after tax accounting result for the period is a loss, deferred tax assets arising from the PSI debit difference and from the accumulated provisions and other general losses due to credit risk are eligible to be converted into a final and settled claim against the Greek State, as described in detail in note 13.

The main uncertainties concerning the estimations for the recoverability of the deferred tax assets relate to the achievement of the goals set in the Group's business plan, which is affected by the general macroeconomic environment in Greece and internationally. These goals mainly concern the reduction of non-performing exposures, the production of new loans as well as the evolution of operating results. At each balance sheet date, the Group reassesses its estimation regarding the recoverability of deferred tax assets in conjunction with the development of the factors that affect it.

The estimates and judgments applied by the Group in making decisions and in preparing the financial statements are based on historical information and assumptions which at present are considered appropriate. The estimates and judgments are reviewed on an ongoing basis in order to take into account current conditions, and the effect of any changes is recognized in the period in which the estimates are revised.

INCOME STATEMENT

2. Net interest income

	From 1 January to	
	31.12.2020	31.12.2019*
Interest and similar income		
Due from banks	2,009	4,574
Loans and advances to customers measured at amortized cost	1,573,728	1,676,564
Loans and advances to customers measured at fair value through profit or loss	13,020	13,451
Trading securities (Note 17)	177	270
Investment securities measured at fair value through other comprehensive income (Note 20a)	108,914	161,994
Investment securities measured at fair value through profit or loss (Note 20b)	974	967
Investment securities measured at amortized cost (Note 20c)	39,467	3,972
Derivative financial instruments	201.037	183.963
Finance lease receivables (Note 19)	10,819	13,101
Negative interest from interest bearing liabilities	121,144	48,880
Other	2,093	1,299
Total	**2,073,382**	**2,109,035**
Interest expense and similar charges		
Due to banks	(22,445)	(54,118)
Due to customers	(111,432)	(172,279)
Debt securities in issue and other borrowed funds	(37,119)	(20,544)
Derivative financial instruments	(198,160)	(199,165)
Lease liabilities (note 32)	(4,567)	(5,573)
Negative interest from interest bearing liabilities	(89,327)	(33,708)
Other	(68,695)	(76,380)
Total	**(531,745)**	**(561,767)**
Net interest income	**1,541,637**	**1,547,268**

During 2020, net interest income decreased compared to 2019, mainly due to the reduction in interest income from loan portfolio and investment securities, as a result of decrease in interest rates on loans and transactions during the year on the investment securities portfolio.

The aforementioned decrease was partially offset by reduced cost on due to customers as a result of the repricing of deposits as well as on due to banks as a result of the substitution of interbank repos agreements by Eurosystem funding at negative interest rates, leading to the conversion of the relevant interest expene to interest income.

The following table presents interest income and interest expense calculated using the effective interest rate method, by financial asset measurement category:

	From 1 January to	
	31.12.2020	31.12.2019*
Financial assets measured at amortised cost	1,575,821	1,646,020
Financial assets measured at fair value through other comprehensive income	108,914	161,994
Financial assets measured at fair value through profit or loss	14,171	14,688
Total	**1,698,906**	**1,822,702**
Financial liabilities measured at amortised cost	(170,996)	(263,371)

* Certain figures of the previous year have been restated as described in note 50.

138 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

3. Net fee and commission income and other income

Net fee and commission income

	From 1 January to	
	31.12.2020	31.12.2019
Loans	45,751	50,670
Letters of guarantee	43,631	45,417
Imports-exports	6,070	8,757
Credit cards	72,735	71,911
Transactions	41,346	45,632
Mutual funds	41,304	37,932
Advisory fees and securities transaction fees	2,436	2,855
Brokerage services	8,194	6,593
Foreign exchange fees	16,909	18,346
Insurance brokerage	18,453	15,911
Other	38,498	36,105
Total	**335,327**	**340,129**

Net fee and commission income decreased compared to 2019, mainly due to lower fees and commissions from loans as well as the lower volume of transactions, imports-exports and letters of guarantee as a result of lower volumes due to Covid-19. The aforementioned decrease on net fee and commission income was partially offset by the increase in commission income from mutual funds due to increased volume of transactions.

Commission income from loans, for the year 2020, includes an amount of of € 45,570 (31.12.2019: € 50,652) which relates to loans and advances to customers that are measured at amortized cost.

Fee and commissions and other income

The table below presents, per operating segment, the income from contracts, that fall within the scope of IFRS 15:

	From 1 January to 31.12.2020						
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Fee and commission income							
Loans	7,247	31,075	392	6,888	1,090		46,692
Letters of guarantee	2,161	37,969	1	1,511	1,990		43,632
Imports-exports	1,191	4,265		1	613		6,070
Credit cards	79,841	29,096		208	10,004		119,149
Transactions	19,758	8,733	348	1,164	11,343		41,346
Mutual funds			41,200	97	7		41,304
Advisory fees and securities transaction fees		550	92	1,596	198		2,436
Brokerage services				9,368	174		9,542
Foreign exchange fees	11,405	4,023	29	982	469		16,908
Insurance brokerage	14,828				3,624		18,453
Other	5,346	3,579	10,251	11,802	12,179		43,156
Total	**141,777**	**119,290**	**52,313**	**33,617**	**41,691**	**-**	**388,688**
Other income							
Hotel services					311		311
Gains from disposal of fixed assets		52			1,655	2,723	4,430
Other	9,062	25	83	993	2,395	7,165	19,723
Total	**9,062**	**77**	**83**	**993**	**4,361**	**9,888**	**24,464**

139 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	From 1 January to 31.12.2019						
	Retail Banking	**Corporate Banking**	**Asset Management / Insurance**	**Investment Banking / Treasury**	**South-Eastern Europe**	**Other / Elimination Center**	**Group**
Fee and commission income							
Loans	8,029	34,559	278	7,976	871		51,713
Letters of guarantee	2,017	40,443	2	869	2,086		45,417
Imports-exports	1,831	6,213		8	705		8,757
Credit cards	99,381	46,258	5	141	9,574		155,359
Transactions	20,149	10,862	412	992	13,217		45,632
Mutual funds			37,830	91	11		37,932
Advisory fees and securities transaction fees		1,419	257	1,028	151		2,855
Brokerage services				7,569	175		7,744
Foreign exchange fees	11,864	4,873	26	1,041	542		18,346
Insurance brokerage	13,616				2,295		15,911
Other	12,543	8,869	9,965	356	10,623		42,356
Total	**169,430**	**153,496**	**48,775**	**20,071**	**40,250**	**-**	**432,022**
Other income							
Hotel services					2,145		2,145
Gains from disposal of fixed assets		1,228			3,256	1,852	6,336
Other	2,783	533	12	2,846	2,256	4,287	12,717
Total	**2,783**	**1,761**	**12**	**2,846**	**7,657**	**6,139**	**21,198**

"Other income" line of the Income Statement includes additionally income form insurance activities and operating lease income and income from insurance indemnities, which are not presented in the above table since they do not fall within the scope of IFRS 15 (note 7).

4. Dividend income

	From 1 January to	
	31.12.2020	**31.12.2019**
Equity securities of trading portfolio	8	9
Equity securities of investing portfolio measured at fair value through other Comprehensive Income (note 20)	2,450	897
Equity securities measured at fair value through profit or loss	500	166
Total	**2,958**	**1,072**

140 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

5. Gains less losses on financial transactions

	From 1 January to	
	31.12.2020	31.12.2019*
Foreign exchange differences	24,957	36,258
Trading securities:		
- Bonds	1,955	3,378
- Equity securities	(1.042)	2,364
Financial assets measured at fair value through profit or loss		
- Loan and advances to customers	(18,037)	(29,870)
- Equity securities	64,942	
- Bonds	443	2,513
- Other securities	(16,006)	15,368
Financial assets measured at fair value through other comprehensive income		
- Bonds	465,782	364,048
- Other securities		11
Impairments / Sale of investments	1,902	12,809
Derivative financial instruments	(22,348)	12,902
Other financial instruments	14,223	5,871
Total	**516,771**	**425,652**

"Gains less losses on financial transactions" for the year 2020 has been mainly affected by:

- Gains of € 465,782 included in "Bonds" of financial assets measured at fair value through other comprehensive income relating to gains from sales of Greek Government bonds and treasury bills amounting to € 467,196 and losses from other corporate bonds amounting to € 1,414.
- Losses of € 18,037 included in "Loans and advances to customers" measured at fair value through profit or loss relating to losses mainly from the valuation adjustments within the year.
- Gains of € 64,942 included in "Equity securities" measured at fair value through profit or loss and mainly related to a gain of € 42,250 deriving from the Open Sale and Conversion Program announced by Mastercard in September 2020 and by which Class B shareholders were provided the right to convert their shares on new issued Class A shares. In particular, on 20.10.2020 the Bank, exercised the conversion right for all its Class B shares and on 10.11.2020 the conversion of Class B shares to Class A shares took place. The new shares were measured at fair value at the date of conversion and classified under financial assets at fair value through profit or loss. From the recognition of the shares at fair value, an amount of € 43,706 gain was recognized. On 11.11.2020, the sale of the abovementioned Class A shares of the Bank to the New York Stock Exchange was completed. On the date of sale, the shares were derecognized and a loss amount of € 1,456 was recognised.

  In addition, a gain of € 22,692 reported in Equity securities measured at fair value through profit or loss relates to the recognition of new preferred shares of VISA Inc Preferred A following the release of part of the value of the existing Class C shares under the Release Process performed on 24.9.2020. Preferred Class A shares may be converted into ordinary in order to be sold.
- Losses of € 16,006 included in "Other Securities measured at fair value through profit or loss" is mainly due to the recognition of a loss of € 17,355 related to the change in the fair value of Class C VISA Inc preferred securities which resulted mainly due to change of their conversion rate to ordinary shares in the context of the Release Process performed on 24.09.2020. The Class C securities were reclassified retrospectively from 1.1.2019 in category "securities measures at fair value through profit and loss" from the category "securities measured at fair value through other comprehensive income", as detailed described in note 50. As a result of the above, the Group recognized in gains less losses on financial transactions of the year 2019 a gain of € 11,072 reported in "other securities measured at fair value through profit or loss".
- Losses € 22,348 included in "Derivative financial instruments" that relates to the Credit Valuation Adjustment of € 8,781 on transactions with the Greek State.

* Certain figures of the previous year have been restated as described in note 50.

141 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

- Profit of € 14,223 included in “Other financial instruments” that relates to the result form the valuation at fair value of the Group shareholding on Cepall Hellas S.A., before acquiring the control, as in detail described in note 40.

Gains less lossed on financial transactions for the year 2019 have been mainly affected by:

- Gains of to € 364,048 included in the “Bonds of financial assets measured at fair value through other comprehensive income” that relates to gains from the sale of Greek Government Bonds and Greek T bills of € 345,432 and other corporate and government bonds amounting to € 18,616.
- Loss of € 29,870 of Loans and advances to customers measured at fair value through profit or loss due to valuation adjustments of the year, and the effect of derecognition
- Gains of € 12,809 in Impairments/Sales of investments which include the gain of € 12,979 from the sale of the subsidiary Alpha Investment Property I S.A.

6. Gains less losses on derecognition of financial assets measured at amortised cost

The tables below present gains less losses for the year 2020 and 2019 from derecognition of financial assets measured at amortised cost as well as their carrying amount before derecognition.

	From 1 January to 31.12.2020			
	Carrying Amount	**(Losses) from derecognition**	**Gains from derecognition**	**Gains less losses from derecognition**
Early repayments				
- Loans and advances to customers	1,749,808	(2,723)	3,245	522
Sales				
- Loans and advances to customers	271,316	(635)	1,417	782
- Securities	595		14	14
Substantial modifications				
- Loans and advances to customers	265,126	(4,116)	5,474	1,358
- Securities	1,941,392		170,526	170,526
Total	**4,228,237**	**(7,474)**	**180,676**	**173,202**

	From 1 January to 31.12.2019			
	Carrying Amount	**(Losses) from derecognition**	**Gains from derecognition**	**Gains less losses from derecognition**
Early repayments				
- Loans and advances to customers	2,623,935	(4,192)	4,249	57
Sales				
- Loans and advances to customers	64,712	(17,022)	729	(16,293)
Substantial modifications				
- Loans and advances to customers	335,932	(8,129)	8,311	182
Total	**3,024,579**	**(29,343)**	**13,289**	**(16,054)**

“Early repayments” includes gains and losses that arise from the recognition in the income statemenent of the unamortised amounts of capitalized commission and fees from loans and advances to customers that were early repaid.

“Sales” include the following:

a) loans and advances to customers that were sold during the years 2020 and 2019, part of which were classified as Assets held for sale during previous periods (note 48).

b) Securities that were sold during the year 2020

“Substantial modifications” include the following:

a) the carrying amount of loans and advances to customers which were derecognized during the years 2020 and 2019 following the substantial modification of their contractual terms, as well as the related profit or loss from the derecognition and any valuation adjustment in the fair value of the newly recognized loans and advances to customers.

142 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

b) securities, that were derecognized during the year 2020 due to exchange transaction with the Greek Government. In particular, on 3.12.2020 the Bank agreed with the Greek Government, the exchange of existing Greek Government Bonds, classified in securities measured at amortized cost, with a nominal amount of € 1,670,000 and a fair value of € 2,111,917, with Greek Government Bonds maturing on 20.3.2050, with a nominal amount of € 1,100,000 and a fair value of € 1,643,536 including cash of € 468,381. The exchange, which had a settlement date of 11.12.2020, was performed on market terms. The gain of € 170,526 recognized in the income statement, resulted from the comparison of the fair value of the bond, maturing on 20.3.2050 and cash received with the carrying amount of the bonds exchanged. The bonds acquired were classified in securities measured at amortized cost (note 20c).

7. Other income

	From 1 January to	
	31.12.2020	31.12.2019
Insurance activities	(12,677)	(1,132)
Hotel activities	311	2,145
Operating lease income	10,211	15,336
Sale of fixed assets	4,430	6,336
Other	20,221	13,166
Total	**22,496**	**35,851**

Operating lease income for 2020 has decreased compared to previous year, as a result of the disposal of the Group subsidiary Alpha Investment Property I S.A. on 11.6.2019 and AGI-BRE Participations 3 EOOD on 30.6.2020 (as described in note 48) who owned and managed investment properties. In addition, this caption includes an amount of € 1,003 (31.12.2019: € 806) relating to income from real estate subleases.

"Other", for 2020, includes an amount of € 6,265 which relates to other income from the company Cepal Holdings S.A. consolidated for the first time under full consolidation method, as described in detail in note 40 and an amount of € 1,682 (31.12.2019: € 462) which relates to insurance compensations for prior periods sick leave payroll contributions.

Income from insurance activities is analyzed as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Life Insurance		
Premiums and other related income	124,448	98,581
Less:		
- Commissions	(673)	(578)
- Claims paid and technical provisions	(136,452)	(99,135)
Total	**(12,677)**	**(1,132)**

8. Staff costs and expenses for separation schemes

a. Staff costs

	From 1 January to	
Staff costs	31.12.2020	31.12.2019
Wages and salaries	321,530	330,844
Social security contributions	76,539	86,044
Employee defined benefit obligation of the Group (note 31)	3,023	5,222
Employee indemnity provision due to retirement based on Law 2112/1920 (note 31)	4,108	4,621
Compensation due to staff separation	4,731	
Cost of staff transferred to Cepal subsidiary	18,705	
Other charges	30,883	33,207
Total	**459,519**	**459,938**

143 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The total number of Group's employees as at 31.12.2020 was 10,528 (31.12.2019: 10,530) out of which 7,510 (31.12.2019: 7,354) are employed in Greece and 3,018 (31.12.2019: 3,176) are employed abroad.

Staff costs have been impacted positively from the reduction of the Group's employees which mainly relates to the participation in the voluntary exit program of 2019.

"Wages and salaries" and "Social security contributions" have been charged with costs relating to staff incentive schemes as a reward on employee's performance defined by the Bank since 2018.

Specifically, since 2018, the Group, following the relevant Board of Directors approval, recognizes provisions for the cost of the Sales Incentive Program, which represents only cash incentive, and of the Performance Incentive Program.

In 2019, the terms of the Performance Incentive Program were specified, and the incentive to the employees and executives can have the form of cash or other financial instruments, whereas in year 2020, it was specified that the benefit relating to years 2018 and 2019 may be awarded in the form of cash and stock option rights.

Based on the decision of the Board of Directors of December 2020, the terms that govern the existing incentive programs are as follows:

Award in cash

According to the terms of the programs, this award is paid in a lump sum by the Group while the relevant expense is recognized at the time the employee acquires the right to receive this remuneration or, if the remuneration depends on targets, at the time of achievement.

For part of the staff, the benefit is paid in a lump sum of up to 60% while the payment of at least 40% is deferred for three years from the initial payment under the condition to remain in employment with the Group. The recognition of the expense relates to the amount whose payment is deferred for three years is recognized as the relevant services are provided.

During the 2020, the results were charged with an amount of € 10,719 (31.12.2019: € 9,678), relating to these programs.

Awarding of stock options rights

The Annual General Meeting of shareholders of 31.07.2020 approved the establishment and implementation of a five year plan which provides the right to acquire newly – issued shares of the Bank (Stock Options Plan) by awarding of stock options rights to management and employees of the Bank and its connected entities. The plan concerns the period 2020-2024 and according to that the beneficiaries may exercise their right to acquire each new share with an offer price equal to the nominal value of the share, i.e. 0.30 €. The General Meeting also approved the assignment to the Board of Directors of the responsibility to determine the beneficiaries, the terms of options' awarding, as well as any other term and condition related to the plan, in accordance with the applicable legal and regulatory framework and Bank's policies.

Following the exercise of the Options Rights, the New Shares are subject to a twelve (12) months retention period.

The Board of Directors of the Bank, at its meeting of 30.12.2020: (a) approved the Plan's Regulation (b) awarded Stock Options Rights under the Performance Incentive Program for the fiscal years 2018 and 2019 to identified employees of the Bank and its connected entities.

On 31.12.2020, the Bank informed the beneficiaries about the terms and the exact amount of their reward according to their performance for the years 2018 and 2019.

In this context, for the years 2018 and 2019, the total number of options rights, granted and may exercised within the period 2021-2024, equals to 4,126,394, each of which corresponds to one (1) New Share, i.e. in case all Option Rights are exercised, up to a total of 4,126,394 newly – issued common, registered shares of the Bank with a nominal value of Euro 0.30 each. Correspondingly, based on the deferral periods of each Program, the exercise periods have been set as follows:

Exercise period	Total maximum number of exercised options
January 2021	2,563,945
January 2022	552,818
January 2023	552,890
January 2024	476,741
Total	**4,146,394**

144 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

For the options for which the exercise period is January 2021, there are no specific vesting conditions at the time of awarding, while for the rest of the options the condition to remain under the Bank employment is prerequisite.

As at 31.12.2020, the Group recognized in the results for the year, through a credit on the reserves, an amount of € 1,667 resulting from the valuation at fair value, on the date awarding, of the above options, that as at 31.12.2020 no specific vesting conditions existed.

The fair value of the above rights was determined as the difference between the stock price of the share on the date of concession and the exercise price.

The caption "Cost of staff transfered to Cepal subsidiary" relates to the compensation to the Bank's staff, in the context of the transfer of the Bank's Non-performing Management Activity (carve-out), to its subsidiary Cepal Hellas S.A. ("Cepal") as detailed described in note 40. The voluntary termination of the employment contract required the payment by the Bank of an amount equivalent to ten (10) gross monthly salaries, as these would be determined on 1.12.2020 based on the provisions of the Sectoral Collective Agreement OTOE - Banks 2019 -2021 (basic scale) with a minimum limit of € 25,000. The abovementioned amount, includes cost for the compensation of senior executives transferred to Cepal Hellas, as described below in the relevant program.

Defined contribution plans

All the employees of the Bank are insured for their main pension plans by the Social Insurance Fund (IKA-ETAM). The Social Insurance Fund (IKA-ETAM) as of 1.1.2017 consists part of the Single Social Security Body (E.F.K.A.), a Public law entity established under the provisions of Law 4387/2016. In addition for the Bank's employees, the following also apply:

a. Staff from the former Alpha Credit Bank and the former Emporiki Bank are insured for subsidiary insurance at the E.T.E.A.E.P. (Joint Supplementary Insurance Fund and Lump Sum Benefits), as renamed on January 1, 2017 by E.T.E.A. with Law 4387/2016. Pre-retirement pensioners are insured as of 1.1.2017 with the Single Social Security Agency (EFKA) under the same Law.

b. The supplementary pension plan for employees of the former Ionian and Laiki Bank of Greece is T.A.P.I.L.T.A.T., a multi-employer plan. The Bank has obtained legal opinions that indicate that it has no obligation if this fund does not have sufficient assets to pay employee benefits. Therefore, the Bank considers that the fund is a defined contribution plan and has accounted for it as such.

c. Employees of former Ionian and Laiki Bank of Greece and former Emporiki Bank are insured for the lump sum benefit in the "Bank Employee and Companies Common Benefit Plan" (T.A.Y.T.E.K.O.) which is a defined contribution plan with contributions paid only by employees. In accordance with article 74 of Law 4387/2016, the Care Sectors of the "Bank Employee and Companies Common Benefit Plan" (T.A.Y.T.E.K.O.) consist part of the E.T.E.A.E.P. (Joint Supplementary Insurance Fund and Lump Sum Benefits).

d. All employees of the Bank receive medical benefits from the National Organization of Health Care (EOPYY) and either in the Care Sector of the former T.A.Y.T.E.K.O. or the former E.T.A.A., both of which have been incorporated into Single Social Security Body (E.F.K.A.) since 1.1.2017

e. Retirement/Savings Insurance Plans

   i) The Bank, in cooperation with insurance company, has created a savings plan. The plan's effective date is January 1, 2011 and its aim is to provide a lump sum monetary benefit to retiring employees.

   The plan assets consist of investment for the fixed monthly contributions of the Bank and its employees.

   Initially the plan included Bank's personnel that were hired and insured for the first time on 1.1.1993 and onwards. After signing the Collective Labor Agreement for the 3-year period of 2016-2019, the personnel of the Bank may be included in the savings plan.

   Except from those employees, that were hired by the Bank and were members of the main pension scheme for the period from 1.1.1993 until 31.12.2004 for which a minimum payment guarantee is required(Law 2084/1992), for the remaining employees, the plan is considered to be a defined contribution plan, given that the beneft is paid out from a savings fund that was accumulated up to the date they leave.

ii) Following the Board of Directors' and General Assebly's decision, the Bank provides to its senior management a group retirement and savings Insurance Plan with effect from 1.1.2018. The plan is a defined contribution plan and aims to provide a lump-sum benefit upon retirement. The savings fund sums up from the investment of defined monthly contributions paid by the senior management and the Bank.

The Bank's "Investment Committee for group insurance employee plans of Alpha Bank" is responsible for determining the appropriate structure of the portfolio of the aforementioned saving plans.

Employee defined benefit obligations

An analysis of liabilities arising from defined benefit plans is included in note 31.

b. Expenses for employee separation schemes

	From 1 January to	
	31.12.2020	31.12.2019
Expenses for employee separation schemes	26,214	49,615
Total	**26,214**	**49,615**

In the context of improving the efficiency and reducing the operating costs under the provisions of the Bank's Business Plan for 2017-2019, the employee separation scheme that was in force for the period 2016-2018 completed withn 2019. From the total provision amount of € 59,004 recognised as at 31.12.2018, during 2019 an amount of € 9,484 was used and the rest of the amount of € 42,916 was reversed.

A voluntary exit program was launched in September 2019, providing as compensation the 100% of the compensation defined by law, plus an incentive based on the age and the years of service and an increase for those employed in specific central services. The program alternatively provided long-term paid leave with the form of either a three or five year leave. The total provision to cover the costs of the voluntary exit program within 2019 amounted to € 89,861 (note 33).

On 29.6.2018 the General Assembly of Shareholders approved the senior executives' compensation plan, a benefit which was further specified by a Regulation subsequently issued. It is noted that the payment of the benefit is voluntary, does not constitute a business practice and may be terminated in the future with the decision of the General Assembly of Shareholders. The charge for the year 2019 for this program amounted to € 2,670, while the respective amount for the year 2020 (€ 1,165) and is included in the line item "Cost of staff transfered to Cepal subsidiary".

In October 2020, Alpha Bank Cyprus Ltd implemented a Voluntary Retirement Plan, which provided for one-time compensation based on age, years of service and annual gross income. At the same time, additional incentives were provided by increasing the amount of compensation for specific services. The total cost of the Voluntary Exit Program, which was recognized in the results of the fiscal year 2020, amounted to € 26,214, out of which € 20,848 was paid to the employees that left the company during 2020, while for participants in the program that will leave during 2021, a liability of € 5,366 was recognised. The number of the employees that joint the Voluntary Exit Program was 188. For those individuals, the Bank will continue to pay contributions to the respective Health Fund and insurance coverage for a period of 2 years.

146 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

9. General administrative expenses

	From 1 January to	
	31.12.2020	31.12.2019*
Lease expenses	369	3,013
Maintenance of EDP equipment	20,034	17,019
EDP expenses	25,076	26,643
Marketing and advertising expenses	20,357	25,819
Telecommunications and postage	16,073	17,551
Third party fees	70,698	64,950
Contribution to the Deposit / Investment Coverage Scheme and to the Resolution Scheme	60,504	56,647
Services for collection agencies	3,274	9,620
Consultants fees relating to financial information	9,714	9,536
Insurance	10,199	9,635
Electricity	8,329	9,460
Building and equipment maintenance	7,649	7,942
Security of buildings-money transfers	14,424	15,074
Cleaning	5,549	5,425
Consumables	3,703	4,490
Commission for the amount of Deferred tax Asset guaranteed by the Greek State (note 13)	5,296	5,469
Taxes and Duties (VAT, real estate tax etc.)	99,441	98,132
Other	91,040	88,220
Total	**471,729**	**474,645**

General administrative expenses present a decrease compared to prior year, mainly due to the decrease of expenses related to the management of debts in arrears, due to the slowdown of the relevant actions as a result of Covid-19 pandemic and the related debtors' relief measures provided for the management of their debt, as well as due to certain cost-cutting measures on advertising and postage costs. The aforementioned decrease was partially offset with the increase of the Bank's contribution to the Single Resolution Board ("SRB"), the Single Resolution Fund of the Hellenic Deposit and Investment Guarantee Fund, as well as the increase in third party fees. In particular, the remuneration of third parties includes an amount of € 2,839 regarding expenses for the transformation project of the operational model of the Bank which started in 2020, with the view to enhance the efficiency of the organization, optimize the business model and further strengthen its measurement and rewards performance system in all functions. The respective projects are designed and implemented by interdepartmental working groups under the coordination of the Transformation Office and the support of external advisors when required. These actions are expected to bring significant benefits to a number of Bank operations and at the same time further enhance profitability, reduce operating costs and enhance the effectiveness of the business model.

The results of the year 2020 were affected by an amount of € 12,432 relating to general administrative expenses of Cepal Hellas S.A. consolidated for the first time under full consolidation method, as described in detail in note 40.

The caption "Lease expenses" includes expenses for short-term leases, low value leases and variable lease payments which are not included in lease liabilities.

* Certain figures of the previous year have been restated as described in note 50.

147 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

10. Other expenses

	From 1 January to	
	31.12.2020	31.12.2019*
Losses from disposals/write-off/impairment on plant, property and equipment, intangible assets and right-of-use assets	23,230	23,080
Provisions (note 33)	11,086	20,439
Other	4,623	2,427
Total	**38,939**	**45,946**

"Losses from disposals/write-off/impairments on plant, property and equipment, intangible assets and rights of use assets" as at 31.12.2020 includes an amount of € 32,828 (31.12.2019: € 15,227) from the recognition of impairment losses of investment property, plant and equipment, assets obtained from auctions and assets held for sale as well as an amount of profit of € 12,592 (31.12.2019: € 2.892 loss) from the reversal impairment of rights-of-use assets resulted mainly from the revaluation of the lease contract duration. The main events and circumstances that led to the recognition of impairment losses are related to:

- Deterioration of its physical condition and / or obsolescence of technology.
- Change of use in the extent or manner in which the asset is being used.
- Muted consumer demand for a medium-term period in certain submarkets which led to value change.
- Institutional interventions that negatively affected certain assets.

Furthermore, this caption includes losses from disposal / destruction of plant, property and equipment amounting to € 7,853 (31.12.2019: € 7,854). The aforementioned impairment losses and losses from disposals of plant, property and equipment are included in the operating segment "Other / Elimination Center" in note 42 "Operating segments".

"Provisions" as at 31.12.2020 relates to provisions for legal cases against the Group, while in year 2019 mainly include an amount of € 21,686 which relates to provision recorded based on the Group's assessment of the inadmissibility of appeals filed in the past related to the payment of insurance contributions, as well as, the reversal of € 640 related to legal cases issued against the Bank. The aforementioned amounts are included in "Other Provisions" of Note 33.

11. Impairment losses and provisions to cover credit risk on loans and advances to customers

"Impairment losses and provisions to cover credit risk" for year 2020 amounted to € 1,319,511 (31.12.2019: € 990,415) and include the total of the captions presented in the table below, along with the impairment losses on other financial instruments, as presented in note 12.

The following table presents the impairment losses and provisions to cover credit risk on loans and advances to customers, financial guarantee contracts, other assets as well as recoveries:

	From 1 January to	
	31.12.2020	31.12.2019
Impairment losses on loans	1,235,876	821,671
Impairment losses on advances to customers	28,385	15,447
Provisions to cover credit risk on letters of guarantee, letters of credit and undrawn loan commitments (note 33)	(741)	1,251
(Gains) / Losses from modifications of contractual terms of loans and advances to customers	68,599	186,324
Recoveries	(26,228)	(29,888)
Impairment losses on other assets	202	
Total	**1,306,093**	**994,805**

For the year 2020, Impairment losses and provisions to cover credit risk on loans and advances to customers amounted to € 1,306,093 (31.12.2019: € 994,805) and include the effect from the impact from the global economic crisis caused by the

* Certain figures of the previous year have been restated, as described in detail in note 50.

148 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Covid-19 pandemic and the recognition of impairment losses for the upcoming sales transactions, as detailed described in note 43.1.

Gains/(Losses) on modifications of contractual terms of loans and advances to customers

The Group, in the context of renegotiation with borrowers or of restructurings, proceeds with the modifications of the contractual cash flows of the loans in order to ensure their repayment.

The following table presents the carrying amount of those loans and advances to customers for which there was gain or loss from the modification of the contractual terms and loss allowance were measured at an amount equal to lifetime expected credit loss i.e loans categorised Stages 2, or stage 3 or loans Purchased or originated credit-impaired (POCI).

	From 1 January to	
	31.12.2020	31.12.2019
Net carrying amount before the modification	9,385,036	21,424,077
Net gain or (loss) due to the modification	(51,184)	(207,705)

The following table presents the carrying amount of loans and advances to customers that modified at a time they had a lifetime expected credit loss and for which the allowance is measured based on 12-month expected credit risk losses at the end of the year.

	From 1 January to	
	31.12.2020	31.12.2019
Carrying amount before allowance for expected credit losses at the end of the year	1,635,937	1,025,644

12. Impairment losses and provision to cover credit risk on other financial instruments

	From 1 January to	
	31.12.2020	31.12.2019
Impairment losses of debt securities and other securities measured at amortized cost	8,940	7,412
Impairment losses of debt securities and other securities measured at fair value through other comprehensive income	4,481	(11,676)
Impairment losses on due from banks	(3)	(126)
Total	**13,418**	**(4,390)**

The impairment losses of debt securities during 2020 are mainly due to placements in Greek Government bonds and of other issuers within the portfolio of debt securities measured at amortized cost. The losses were limited by the upgrade of the credit rating of the Greek Government bonds from B1 to Ba3 in November. It is noted that Covid-19 pandemic did not lead to a significant increase in credit risk on other securities held by the Group.

The positive impact on the expected credit losses for debt securities measured at fair value through other comprehensive income within 2019 derives from the upgrading of the credit rating of the Greek Government by Moody's on 1.3.2019 to B1 from B3.

149 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

13. Income tax

According to article 22 of Law 4646 / 12.12.2019 "Tax reform with a growth dimension for tomorrow's Greece", the tax rate on business profits acquired by legal entities in Greece is reduced to 24% on income of fiscal year 2019 onwards. By explicit reference to the law, this reduction does not apply to credit institutions for which the tax rate is still 29%.

Article 20 of the same law exempts income tax on income derived from the goodwill of the transfer of equity instruments to a legal entity resident in a Member State of the European Union, which a legal entity receives which is a tax resident of Greece if the legal entity whose titles are transferred fulfills the conditions prescribed by law. This income shall not be taxable on the distribution or capitalization of these profits. Any impairment losses recognized as at 31.12.2019 are deducted under certain conditions from gross income at the time of transfer. The provision applies to income derived from 1.7.2020 onwards.

Furthermore, the withholding rate is reduced to 5% from 10% in dividends paid from 1.1.2020 and onwards.

For the Bank' subsidiaries and branches operating in other countries, the applicable nominal tax rates for the year 2020 are as follows, with no changes compared to the tax rates of year 2019:

Cyprus	12.5
Bulgaria	10
Serbia	15
Romania	16
Luxembourg	24.94

Albania	15
Jersey	10
United Kingdom	19
Ireland	12.5

In accordance with article 65A of Law 4174/2013, from 2011, the statutory auditors and audit firms conducting statutory audits to a Societe Anonyme (S.A.), are obliged to issue an Annual Tax Certificate on the compliance on tax issues. This tax certificate is submitted to the entity being audited within the first ten days of the tenth month after the audited financial year, as well as, electronically to the Ministry of Finance no later than the end of the tenth month after the end of the audited financial year. In accordance with article 56 of Law 4410/03.08.2016 for the fiscal years from 1.1.2016 and onwards, the issuance of tax certificate is optional. However, the Group and its companies intend to continue to obtain the tax certificate.

For the fiscal years 2011 up to 2019, the tax audit based on article 65A of L. 4174/2013 has been completed for both the Bank and the Group companies in Greece, and they have received the relevant tax certificates without any qualifications on the tax issues covered. The tax audit for the fiscal year 2020 is in progress.

The income tax is analysed as follows:

	From 1 January to	
	31.12.2020	**31.12.2019***
Current tax	32,599	14,643
Deferred tax	(22,476)	36,171
Total	**10,123**	**50,814**

* Certain figures of the previous year have been restated, as described in detail in note 50.

150 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Deferred tax recognized in the income statement is attributable to temporary differences, the effect of which is analyzed in the table below:

	From 1 January to	
	31.12.2020	31.12.2019*
Debit difference of Law 4046/2012	44,555	44,555
Debit difference of Law 4465/2017	(1,652,405)	(14,082)
Write-offs, depreciation, impairment of plant, property and equipment and leases	14,761	17,293
Loans	1,634,180	(221,750)
Valuation of loans due to hedging	582	(261)
Defined benefit obligation and insurance funds	1,625	2,072
Valuation of derivative financial instruments	(25,661)	18,371
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	555	345
Valuation/Impairment of investments	8,918	4,227
Valuation/Impairment of debt securities and other securities	24,776	13,751
Tax losses carried forward	3,754	167,358
Other temporary differences	(78,116)	4,292
Total	**(22,476)**	**36,171**

"Other temporary differences" includes an amount of € 66,251 relating to the deferred tax asset recognized from the transfer of the Bank's NPE unit (carve-out) to the subsidiary Cepal Hellas S.A., as the profit from the transfer has been recognized for tax purposes in the current year while for IFRS purposes does not meet the recognition criteria (see note 40).

In the context of the restructuring of the Group's subsidiaries under three pillars, which was completed within December 2020, reversed the deferred tax asset that was recognized on the investments classified as held for sale amounting to € 107,200 and included within caption "Valuation / impairment of investments" since part of the result of the aforementioned transaction, relating to losses for which on impairment loss of the investment was recognized until 31.12.2019, was deducted for tax purposes in accordance with the provisions of Article 20 of Law 4646 / 12.12.2019, as mentioned above.

"Debit difference of Law 4046/2012" relates to the deferred tax asset on tax losses, due to the Bank's participation in the Greek government bonds exchange program (PSI) and the Greek government bond buyback program on December 2012, which have been recognized as a debit difference in accordance with Law 4046/14.2.2012 and Law 4110/23.1.2013. According to Law 4110/23.1.2013 the "debit difference" is deductible, gradually in equal installments, within 30 years.

Moreover, according to article 5 of Law 4303/17.10.2014 "Ratification of the Legislative Act Emergency legislation to replenish the General Secretary of Revenue upon early termination of office (A' 136) and other provisions", which replaced article 27A of Law 4172/2013, deferred tax assets of legal entities supervised by the Bank of Greece, under article 26 paragraphs 5, 6 and 7 of Law 4172/2013 that have been or will be recognized and are due to the debit difference arising from the PSI and the accumulated provisions and other general losses due to credit risk, with respect to existing amounts up to 31.12.2014, are converted into final and settled claims against the State, if, the accounting result for the period, after taxes, is a loss, according to the audited and approved financial statements by the Ordinary Shareholders' General Meeting.

The inclusion in the Law is implemented with the approval of the General Meeting of Shareholders and relates to tax assets arising from 2016 and onwards, relating to fiscal year 2015 and onwards, whereas it is envisaged the end of inclusion in the Law with the same procedure and after obtaining relevant approval from the Regulatory Authority.

According to article 4 of Law 4340/01.11.2015 "Recapitalization of financial institutions and other provisions of the Ministry of Finance" the above were amended regarding the time of the application which is postponed for a year. In addition the amount of the relevant deferred tax asset which is included in the above provisions of article 5 of Law 4303/17.10.2014 and relates to accumulated provisions and other general losses due to credit risk, is limited to the amount related to the provisions for credit risk, which were accounted for on 30.06.2015.

In connection with the amount included in caption "Debit difference of Law 4465/4.4.2017", according to article 43 of Law 4465/04.4.2017 "Integration of Directive 2014/92/EU of the European Parliament and Council held on 23.7.2014 for the comparability of charges related to payment accounts, the change of payment account and the access to payment accounts

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151 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

with basic characteristics and other provisions", the articles 27 and 27A of the Income Tax Code were amended (Law 4172/2013). In particular, par. 3 of article 27, as amended, provides the right to amortise losses registered by the above legal entities, for a period of 20 years, if those losses resulted from debt write-offs from their balance sheet due to loan settlement or restructuring contractually, judicial or extrajudicial or due to the transfer of the loan to companies of loan acquisition or securitization or to credit and financial institutions or other companies and legal entities under the conditions that the management of those loans is carried out by a claims servicing company. The tax benefit of the 20-year depreciation is given only to the realized losses. In case of an accounting write-off of the loan considering that the events for the final debt write-off or transfer of the loan have not yet completed, the tax result for the year of the accounting write-off is not affected. When these events occur, the amount that was written off will be converted into a debit difference and will be amortised over the estimated 20-year period.

The amended provisions of Article 27A explicitly provide that in addition to the deferred tax assets relating to the amount of accumulated provisions and other general losses due to credit risk and to the remaining (amortized) balance of the PSI, the deferred tax asset relating to accounting write-offs and final losses due to final write-off or transfer of loans, under certain conditions, can be converted to final and settled receivable against the State and therefore to be included in the regulatory capital. It is noted that the right to convert deferred tax asset into final and settled against the State, had already been provided in the legislative framework since 2014 in order to avoid losses in the regulatory capital of credit institutions.

Based on the above mentioned Law, the total amount of deferred tax asset from (a) the debit difference of L. 4465/2017, (b) the temporary differences from any accounting write-off of loans and credits and (c) the temporary differences from accumulated provisions and other losses due to credit risk, is limited to the total tax amount related to accumulated provisions and other losses due to credit risk, recognised until 30.06.2015.

This amendment ensures that the loan write-offs and disposals, aiming to decrease the non-performing loans, will not result in the loss of regulatory capital.

The above apply from 01.01.2016.

As at 31.12.2020, the amount of deferred tax assets which are in the scope of the Law 4465/2017, and includes the debit difference balance of Law 4046/2012 (PSI) amounts to € 3,030 million (31.12.2019: € 3,166.7 million).

The "Debit difference L.4465 / 2017" of the current year includes a deferred tax of € 1,486,703 resulting from the securitization of loans (project Galaxy), as further described in notes 19 and 51. According to the terms of the transaction, the related allowances for expected credit losses were considered final and setteled for tax purposes subject to 20 years amortization, resulting in an increase of the balance of the respective caption and an equivalent decrease of the deferred tax of the "Loan Portfolio".

According to article 82 of Law 4472/19.5.2017 "Public Pension Provisions and amendment of provisions of Law 4387/2016, measures for the implementation of budgetary targets and reforms, social support measures and labor regulations, Medium-term Fiscal Strategy Framework 2018-2021 and other provisions" credit institutions and other entities that fall under the provisions of article 27A of Law 4172/2013, are required to pay an annual commission of 1.5% for the guaranteed by the Greek State deferred tax asset that results from the difference between the tax rate currently in force (29%) and the tax rate that was in force on 31.12.2014 (26%). The respective amount of € 5,296 is included in caption "General and administrative expenses" (Note 9).

The Group has not been recognized deferred tax assets at 31.12.2020 amounting to € 213,161 (31.12.2019: € 172,911) of which € 179,694 relate to tax losses (presented in the following table) and an amount of € 33,467 to assets no maturity for tax purposes. The aforementioned deferred tax assets, are reassessed at each reporting date, in the context of the assessment of the deferred tax asset recoverability.

Year of maturity of tax losses	Deferred Tax Assets
2021	20,941
2022	59,839
2023	36,650
2024	22,594
2025	33,031
2026	6,428
2027	211
Total	**179,694**

The nominal tax rate is the average tax rate resulting from the income tax, based on the nominal tax rate, and the pre-tax results, for the parent and for each of the Group's subsidiaries.

A reconciliation between the effective and nominal tax rate is provided below:

	From 1 January to			
	31.12.2020		31.12.2019*	
	%		%	
Profit / (Loss) before income tax		**114,068**		**156,225**
Income tax (nominal tax rate)	52.69	60,103	36.31	56,720
Increase / (Decrease) due to:				
Non-taxable income	(3.95)	(4,511)	(9.38)	(13,610)
Non-deductible expenses	6.21	7,084	9.86	14,313
Reversal of provision for legal claims	(31.80)	(36,274)		
Adjustment in tax rates for the estimation of deferred tax	0.00		1.45	2,105
Non-recognition of deferred tax for temporary differences of the current year	35.85	40,893	8.32	12,072
Other tax differences	(50.13)	(57,172)	(13.31)	(20,786)
Income tax (effective tax rate)	**8.87**	**10,123**	**33.25**	**50,814**

The Bank, following the reassessment in 2020 of the recoverability of legal claims from withholding taxes, reversed the recognized provision amounting to € 36,274.

"Other tax differences" includes an amount of € 54,213 relating to the reversal of deferred tax that was calculated on investments classified as assets held for sale, due to changes in the tax regime in Article 20 of Law 4646/2019 as described above.

* Certain figures of the previous year have been restated, as described in detail in note 50.

153 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Income tax of other comprehensive income recognized directly in equity

	From 1 January to					
	31.12.2020			31.12.2019*		
	Before Income tax	Income tax	After Income tax	Before Income tax	Income tax	After Income tax
Amounts that may be reclassified to the Income Statement						
Net change in the reserve of debt securities measured at fair value through other comprehensive income	(363,946)	104,538	(259,408)	523,929	(150,535)	373,394
Net change in cash flow hedge reserve	20,841	(6,044)	14,797	(130,463)	37,834	(92,629)
Currency translation differences from financial statements and net investment hedging of foreign operations	(2,951)	(2,943)	(5,894)	(1,486)	(2,078)	(3,564)
	(346,056)	**95,551**	**(250,505)**	**391,980**	**(114,779)**	**277,201**
Amounts that will not be reclassified to the Income Statement						
Net change in actuarial gains/(losses) of defined benefit obligations	(2,814)	979	(1,835)	(11,325)	3,258	(8,067)
Gains/(Losses) from equity securities measured at fair value through other comprehensive income	3,619	(293)	3,326	(20,355)	6,179	(14,176)
	805	**686**	**1,491**	**(31,680)**	**9,437**	**(22,243)**
Total	**(345,251)**	**96,237**	**(249,014)**	**360,300**	**(105,342)**	**254,958**

On 1.1.2019, an amount of € 11,408 was recognized in "Retained earnings" relating to a credit deferred tax as a result of the implementation of IFRS 16.

Tax advances and withholding taxes

Further to the information detailed provided in note 13 of Group Financial Statements as at 31.12.2019, it is noted that article 93 of Law 4605/1.4.2019 "Alignment of Greek legislation with the European Parliament and Council Directive (EU) 2016/943 of 8.6.2016 on the protection of undisclosed know-how and business information (trade secrets) against their unlawful acquisition, use and disclosure (EEL 157, 15.6.2016). Measures for accelerating the work of the Ministry of Economy and other provisions" provides that:

- The credit balances of fiscal years 2008 and 2010 up to 2012 that arose from withholding taxes on specially taxed income are transferred and will be offset at the time when income tax is incurred and in proportion to that tax. This set-off procedure also includes any amounts refunded by virtue of court decisions, for which the obligation to return them to the Greek State is borne at the time and proportionally to the amount of the income tax recognized. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 85,156.
- The credit balances that arose under Law 4046/2012 and have not been offset after the end of the five-years period from their recognition, will be offset starting from 1.1.2020 in ten equal annual installments with any tax liability of the banks. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 63,114.

Following the abovementioned Law decisions, the Bank' s receivables against the Greek State from withholding taxes will be subject to the offset procedure described in the above provisions. During 2020, the Bank offseted with current tax liabilities an amount of € 6,311 that corresponds to the 1/10th of the total credit balance of € 63,114.

* Certain figures of the previous year have been restated as described in note 50.

154 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

14. Earnings/(losses) per share

a. Basic

Basic earnings/(losses) per share are calculated by dividing the net profit/(losses) for the year attributable to ordinary equity holders of the Bank, by the weighted average number of ordinary shares outstanding during the period, excluding own shares held, during the period.

	From 1 January to	
	31.12.2020	31.12.2019*
Profit / (Loss) attributable to equity holders of the Bank	**103,737**	**105,296**
Weighted average number of outstanding ordinary shares	1,543,699,381	1,543,699,381
Basic earnings /(losses) per share (in €)	0.0672	0.0682

b. Diluted

Diluted earnings/(losses) per share are calculated by adjusting the weighted average number of ordinary shares outstanding during the period with the dilutive potential ordinary shares. The Bank holds shares of this category, which arise from a plan of awarding stock options rights to employees of the Bank and its connected entities (note 8).

For the calculation of the diluted earnings per share, it is assumed that the option rights are exercised and that the related inflows derive from the issuance of common shares at the average market price of the year during which the options were outstanding. The difference between the number of options to be granted and the ordinary shares issued at the average market price for ordinary shares, is recognized as issuance of ordinary shares without exchange.

	From 1 January to	
	31.12.2020	31.12.2019*
Profit / (Loss) attributable to equity holders of the Bank	**103,737**	**105,296**
Weighted average number of outstanding ordinary shares	1,543,699,381	1,543,699,381
Adjustment for options	4,598	
Weighted average number of outstanding ordinary shares for diluted earnings per share	1,543,703,979	1,543,699,381
Diluted earnings /(losses) per share (in €)	0.0672	0.0682

It is noted that in January 2021, 2,281,716 options rights were exercised, which resulted in the issuance of 2,281,716 ordinary, registered and voting shares with a nominal value of € 0.30 each. The Share Capital of the Bank increased by € 685 and the reserve from the difference from the issuance of equity shares increased by € 1,483.

* Certain figures of the previous year have been restated as described in note 50.

155 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ASSETS

15. Cash and balances with Central Banks

	31.12.2020	31.12.2019
Cash	387,224	419,446
Cheques receivables	2,992	18,953
Balances with Central Banks	7,077,100	1,589,936
Total	**7,467,316**	**2,028,335**
Less: Deposits pledged to Central Banks	(208,375)	(318,803)
Total	**7,258,941**	**1,709,532**

The increase in Cash and Balances with Central Banks is mainly due to the increase of funding by the Eurosystem as described in note 43.3.

Cash and cash equivalents (as presented in the Statement of Cash Flows)

	31.12.2020	31.12.2019
Cash and balances with central banks	7,258,941	1,709,532
Securities purchased under agreements to resell (Reverse Repos)	240,049	1,164,950
Short-term placements with other banks	491,910	527,846
Total	**7,990,900**	**3,402,328**

16. Due from banks

	31.12.2020	31.12.2019
Placements with other banks	896,761	855,834
Guarantees for derivative securities coverage and repurchase agreements (note 39)	1,632,298	1,345,304
Securities purchased under agreements to resell (Reverse Repos)	240,049	1,164,950
Loans to credit institutions	42,527	36,694
Less:		
Allowance for expected credit losses (note 43.1)	(70,088)	(70,092)
Total	**2,741,547**	**3,332,690**

The reduction in Due from banks is mainly attributable to the termination of agreements of Reverse Repo transactions.

17. Trading securities

The following table presents an analysis of the carrying amount of trading portfolio per type of security.

	31.12.2020	31.12.2019
Bonds:		
Greek Government	29,154	17,490
Other issuers		371
Equity Shares:		
Listed	860	890
Total	**30,014**	**18,751**

156 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

18. Derivative financial instruments (assets and liabilities)

	31.12.2020		
	Contractual Nominal Amount	Fair Value	
		Assets	Liabilities
Derivatives held for trading purposes			
a. Foreign exchange derivatives			
Foreign exchange forwards	257,295	5,634	4,846
Foreign exchange swaps	916,690	4,854	3,443
Cross currency swaps	580,954	12,092	16,001
Currency options	461,030	1,777	1,805
Currency options embedded in customer products	853	2	
Total non-listed	**2,216,822**	**24,359**	**26,095**
b. Interest rate derivatives			
Interest rate swaps	25,589,901	1,218,928	1,712,289
Interest rate options (caps and floors)	883,084	11,860	11,623
Total non-listed	**26,472,985**	**1,230,788**	**1,723,912**
c. Commodity derivatives			
Commodity swaps	307,524	5,241	4,238
Total non-listed	**307,524**	**5,241**	**4,238**
d. Index derivatives			
Index swaps	40,668	262	262
OTC options	1,696	19	19
Index options embedded in customer products			
Total non-listed	**42,364**	**281**	**281**
Futures	259		40
Total listed	**259**	**-**	**40**
e. Other derivatives			
GDP linked security	636,920	2,420	
Total-listed	**636,920**	**2,420**	
Derivatives for fair value hedging			
a. Foreign exchange derivatives			
Foreign exchange swaps	54,851	402	
Cross currency swaps	97,029		1,930
Total non-listed	**151,880**	**402**	**1,930**
b. Interest rate derivatives			
Interest rate swaps	2,086,800	3,592	11,861
Total non-listed	**2,086,800**	**3,592**	**11,861**
Grand Total	**31,915,554**	**1,267,083**	**1,768,357**

In the context of the daily process for setting off and providing collateral for derivatives transactions with credit institutions counterparties the Group has pledged as collateral a net amount of € 1,628,493 on 31.12.2020 (31.12.2019: € 1,328,704). The respective fair value of derivatives with credit institutions amounted to € 1,516,821 on 31.12.2020 (31.12.2019: € 1,236,541).

157 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019		
	Contractual Nominal Amount	Fair Value	
		Assets	Liabilities
Derivatives held for trading purposes			
a. Foreign exchange derivatives			
Foreign exchange forwards	198,501	1,261	1,392
Foreign exchange swaps	945,023	4,626	734
Cross currency swaps	966,945	34,929	41,661
Currency options	55,939	1,288	1,283
Currency options embedded in customer products	4,129	17	64
Total non-listed	**2,170,537**	**42,121**	**45,134**
Futures			
Total-listed	-	-	-
b. Interest rate derivatives			
Interest rate swaps	15,906,397	956,971	1,071,977
Interest rate options (caps and floors)	212,592	2,767	1,125
Total non-listed	**16,118,989**	**959,738**	**1,073,102**
Futures			
Total-listed	-	-	-
c. Commodity derivatives			
Commodity swaps	54,139	2,178	1,877
Total non-listed	**54,139**	**2,178**	**1,877**
d. Index derivatives			
OTC options	73,605	1,950	21
Index options embedded in customer products	182	3	62
Total non-listed	**73,787**	**1,953**	**83**
Futures	34		
Total-listed	**34**	-	-
e. Other derivatives			
GDP linked security	762,748	2,288	
Total-listed	**762,748**	**2,288**	-
Derivatives for hedging fair value			
a. Foreign exchange derivatives			
Foreign exchange swaps	57,506	71	
Cross currency swaps	97,266		3,418
Total non-listed	**154,772**	**71**	**3,418**
b. Interest rate derivatives			
Interest rate swaps	871,800	844	323,301
Total non-listed	**871,800**	**844**	**323,301**
Grand Total	**20,206,806**	**1,009,193**	**1,446,915**

Hedging accounting

a. Fair value hedges

The Group uses interest rate swaps to hedge its exposure to changes in the fair values due to changes in market rates of fixed interest rate: a) Greek Government Bonds, b) retail loans and c) a specific corporate loan.

For all hedges of interest rate risk, the Group determines the reference interest rate associated with the hedged risk (Euro rate) at inception of the hedging relationship and calculates the changes in the fair value of the hedging instrument with respect to euro interest rate curve.

The amendments of the related IFRS that address issues arising from the interest rate benchmark reform do not expect to have any impact to the existing fair value hedges considering that the hedging instruments are applied with the corresponding Euribor referenced interest rate and that it is not replaced with any alternative interest rate.

158 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In order to measure hedge effectiveness, the changes in the fair value of the hedged item are compared to the changes in the fair value of the hedging instrument and in order for the hedge to qualify as effective, the ratio of the change in the fair value of the hedging instrument over the change in the fair value of the hedged item is required to be within 80% -125% (dollar offset method).

The Group has identified the following sources which may lead to hedging ineffectiveness:

a) Credit risk of the derivative counterparty, which is not offset by the hedged item. The Bank minimizes counterparty credit risk in derivative instruments by entering into transactions with counterparties which are also covered with collateral agreements.

b) Difference in timing of cash flows of hedged items and hedging instruments.

During the year, the Group did not identify any other source of hedging ineffectiveness.

On 10.3.2020, the Bank designated as hedging instrument a Greek Government bond measured at amortised cost of a nominal value of € 58,000.

On 6.4.2020, the hedging relationship of Greek Government bonds measured as fair value through other comprehensive income of nominal value € 720,000 was discontinued and a new hedging relationship was designated for Greek Government Bonds measured at amortized cost of nominal value of € 667,000 which in turn was discontinued on 3.12.2020. On 3.12.2020 a new hedging relationship was designated for Greek government bond measured at amortized cost with a nominal value of € 800,000.

Hedging instruments of 31.12.2020 are summarized as follows:

Risk category	Duration 1 - 5 years
Interest rate risk	
Tier II Bond issued by the Bank	
Nominal amount of the derivative	491,800
Average fixed interest rate	(0.32%)
Fixed rate retail loans	
Nominal amount of the derivative	450,000
Average fixed interest	(0.39%)

Risk category	Duration > 5 years
Interest rate risk	
Greek Government Bond Nominal amount of € 800,000	
Nominal amount of the derivative	1,095,000
Average fixed interest	(0.06%)
Greek Government Bond Nominal amount of € 58,000	
Nominal amount of the derivative	50,000
Average fixed interest	(0.17%)

Hedging instruments of 31.12.2019 are summarized as follows:

Risk category	Duration 1 - 5 years
Interest rate risk	
Fixed rate retail loans	
Nominal amount of the derivative	450,000
Average fixed interest	(0.39%)
Corporate loan	
Nominal amount of the derivative	21,800
Average fixed interest	0.02%

159 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Risk category	**Duration > 5 years**
Interest rate risk	
Greek Government Bonds Nominal amount of € 720,000	
Nominal amount of the derivative	400,000
Average fixed interest	(0.06%)

The balance sheet and the income statement amounts relating to fair value hedging instruments and the hedge effectiveness are analyzed as follows:

<table>
<tr><th colspan="8">2020</th></tr>
<tr><th rowspan="2">Hedging relationship</th><th rowspan="2">Derivative Type</th><th colspan="2">Carrying amount of hedging instrument</th><th rowspan="2">Line item in the balance sheet where the hedging instrument is included</th><th rowspan="2">Change in fair value of hedging instrument used for calculating the hegde effectiveness for 2020</th><th rowspan="2">Ineffectiveness recognised in the income statement for 2020</th><th rowspan="2">Line item in the Income statement that included hedge ineffectiveness</th></tr>
<tr><th>Assets</th><th>Liabilities</th></tr>
<tr><td>Interest rate risk</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Greek Government Bonds with nominal value € 720 million</td><td></td><td></td><td></td><td></td><td>(34,043)</td><td>(5,083)</td><td rowspan="7">Gains less losses on financial transactions</td></tr>
<tr><td>Greek Government Bonds with nominal value € 667 million</td><td></td><td></td><td></td><td></td><td>(13,588)</td><td>550</td></tr>
<tr><td>Greek Government Bond with nominal value € 800 million</td><td>Interest rate swap</td><td></td><td>11,027</td><td rowspan="3">Derivatives</td><td>(10,683)</td><td>(1,076)</td></tr>
<tr><td>Greek Government Bond with nominal value € 58 million</td><td>Interest rate swap</td><td>375</td><td></td><td>(280)</td><td>(18)</td></tr>
<tr><td>Tier II Bond issued by the Bank</td><td>Interest rate swap</td><td>3,199</td><td></td><td>4,075</td><td>(18)</td></tr>
<tr><td>Corporate Loan</td><td></td><td></td><td></td><td></td><td>74</td><td></td></tr>
<tr><td>Fixed rate retail loans</td><td>Interest rate swap</td><td>18</td><td>834</td><td>Derivatives</td><td>(2,052)</td><td>29</td></tr>
</table>

160 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

2019							
Hedging relationship	**Derivative Type**	**Carrying amount of hedging instrument**		**Line item in the balance sheet where the hedging instrument is included**	**Change in fair value of hedging instrument used for calculating the hegde effectiveness for 2019**	**Ineffectiveness recognised in the income statement for 2019**	**Line item in the Income statement that included hedge ineffectiveness**
		Assets	**Liabilities**				
Interest rate risk							
Covered bond issued by the Bank terminated relationship					2,727	(15)	
Targeted long-term refinancing operations ECB (TLTRO) terminated relationship					363	41	Gains less losses on financial transactions
Corporate loan	Interest rate swap		74		11		
Greek Government Bonds of nominal value € 720 million			323,227	Derivatives	39,776	3,795	
Fixed rate retail loans		844			852	(36)	

The amounts related to balance sheet items designated as hedged items are analyzed as follows:

2020						
Hedging relationship	**Carrying Amount**		**Accumulated amount of fair value hedge adjustments on the hedged item**		**Line item in the balance sheet where the hedged item is included**	**Change in fair value of hedged item used for calculating the hedge effectiveness**
	Assets	**Liabilities**	**Assets**	**Liabilities**		
Interest rate risk						
Greek Government bonds Portfolio nominal value € 800 million	1,201,665		9,607		Investment securities measured at amortized cost	9,607
Greek Government bonds Portfolio nominal value € 58 million	59,046		262		Investment securities measured at amortized cost	262
Tier II Bonds issued by the Bank		510,078		(4,092)	Issued bonds and other loan liabilities	(4,161)
Fixed rate retail loans	451,193		1,193		Loans and advances to customers	2,081

 The amounts are presented in thousands of Euro unless otherwise indicated

2019						
Hedging relationship	Carrying Amount		Accumulated amount of fair value hedge adjustments on the hedged item		Line item in the balance sheet where the hedged item is included	Change in fair value of hedged item used for calculating the hedge effectiveness
	Assets	Liabilities	Assets	Liabilities		
Interest rate risk						
Greek Government bonds Portfolio nominal value € 720 million	917,027		(35,981)		Investment securities measured at fair value through other comprehensive income	(35,981)
Fixed rate retail loans	449,112		(888)		Loans and advances to customers	(888)
Corporate loan	21,572		74		Loans and advances to customers	(11)

The amounts related to balance sheet items, whose hedging relationship has been terminated during the year 2020 and 2019 are analyzed as follows:

2020						
Hedging relationship	Carrying value of items for which hedging has been terminated		Accumulated amount of fair value hedge adjustments on the hedged item		Line item in the balance sheet where the hedged item is included	Change in fair value of hedged item used for calculating the hedge effectiveness
	Assets	Liabilities	Assets	Liabilities		
Interest rate risk						
Greek Government bonds Portfolio nominal value € 720 million	259,949		(1,531)		Investment securities measured at fair value through other comprehensive income	28,960
Greek Government bonds Portfolio nominal value € 667 million	127,168		2,507		Investment securities measured at amortized cost	14,138
Corporate loans					Loans and advances to customers	(74)

2019						
Hedging relationship	Carrying value of items for which hedging has been terminated		Accumulated amount of fair value of item for which the hedging relationship has been terminated		Line item in the balance sheet where the item is included	Change in fair value of hedged item used for calculating the hedge effectiveness in 2019
	Assets	Liabilities	Assets	Liabilities		
Interest rate risk						
Covered bond issued by the Bank terminated relationship		514,317		8,871	Debt securities in issue and other borrowed funds	(2,742)
Targeted long-term refinancing operations ECB (TLTRO) terminated relationship		996,198		3,210	Due to banks	(322)

162 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

b. Cash flow hedges

In regards to cash flows hedging relationships, the Group determines the referenced interest rate associated with the hedged risk (Euro rate) at inception of the hedging relationship and measures the changes in the fair value of the hedging instrument and a hypothetical derivative relating to Euro interest rate curve changes.

The floating leg of the hypothetical derivative replicates the cash flows of the hedged item, whereas the fixed leg cash flows are determined so that the hypothetical derivative has a value equal to zero at inception. In order to measure the effectiveness of the hedge, the changes of the hypothetical derivative are compared to the changes of the hedged item, and in order for the hedge to qualify as effective the ratio of the change in the fair value of the hypothetical derivative over the change in the fair values of the hedged item should be between 80% - 125% (dollar offset method).

The Group has identified the following sources that may lead to ineffective hedging:

a) Credit risk of the derivative counterparty, which is not offset by the hedged item. The Group minimizes counterparty credit risk in derivative instruments by entering into transactions with counterparties which are also covered with collateral agreements.

b) Difference in timing of cash flows of hedged items and hedging instruments.

No other sources of ineffectiveness were identified during the year.

The balance sheet and the income statement amounts relating to cash flow hedging instruments and the ineffectiveness of the hedging as at 31.12.2020 and 31.12.2019 are analyzed as follows:

2020

Hedging relationship	Type of derivative	Carrying amount of hedging instrument: Assets	Carrying amount of hedging instrument: Liabilities	Change in fair value of hedging instrument used for calculating hedge effectiveness for the year 2020	Change in the fair value of the hedging instrument recognized in the cash flow hedge reserve for the year 2020	Change in the fair value of the hedging instrument recognized in the income statement for the year 2020	Line item in the income statement category affected by the reclassification	Ineffectiveness recognised in the income statement for the year 2020	Line item in the income statement that includes hedge ineffectiveness	Amount reclassified from the cash flow hedge reserve to the income statement in 2020 from hedging relationship that have been terminated	Line item in the income statement affected by hedging relationships that have been terminated
Interest risk											
Term deposits and renewals	Interest rate swap									(20,841)	Net interest income

2019

Hedging relationship	Type of derivative	Carrying amount of hedging instrument: Assets	Carrying amount of hedging instrument: Liabilities	Change in fair value of hedging instrument used for calculating hedge effectiveness for the year 2019	Change in the fair value of the hedging instrument recognized in the cash flow hedge reserve for the year 2019	Change in the fair value of the hedging instrument recognized in the income statement for the year 2019	Line item in the income statetement category affected by the reclassification	Ineffectiveness recognised in the income statement for the year 2019	Line item in the income statement that includes hedge ineffectiveness	Amount reclassified from the cash flow hedge reserve to the income statement in 2019 from hedging relationship that have been terminated	Line item in the income statement affected by hedging relationships that have been terminated
Interest risk											
Term deposits and renewals	Interest rate swap			(153,806)	(139,458)	(14,220)	Net interest income	(128)	Gains less losses on financial transactions	(9,004)	Net interest income
Foreign currency risk											
Loans in currency (CHF)	FX swaps			(5,362)	(19)	(5,647)	Gains less losses on financial transactions	90	Gains less losses on financial transactions	(10)	Net interest income
						213	Net interest income				

The amounts are presented in thousands of Euro unless otherwise indicated

Amounts recognized in the cash flow hedge reserve as at 31.12.2020 and 31.12.2019 are analyzed as follows:

31.12.2020				
	Line item in the balance sheet where the hedge item is included	Cash flow hedge reserve (before tax) from existing hedging relationships	Cash flow hedge reserve (before tax) from discontinued hedging relationships	Cash flow hedge reserve (before tax)
Interest risk				
Term deposits inEuro	Due to customers		(315,029)	(315,029)

31.12.2019				
	Line item in the balance sheet where the hedge item is included	Cash flow hedge reserve (before tax) from existing hedging relationships	Cash flow hedge reserve (before tax) from discontinued hedging relationships	Cash flow hedge reserve (before tax)
Interest risk				
Term deposits in Euro	Due to customers		(335,871)	(335,871)

c. Hedging of net investment in foreign subsidiaries

The Group hedges part of the net investment in RON through loans in RON and foreign exchange swap derivatives. In addition, the Group hedges part of the net investment in GBP in the subsidiary Alpha Bank London through forward foreign exchange derivative transactions that are renewed. For the hedging of the foreign currency risk of the net investment in foreign operations, valuation of the net assets takes place using the spot exchange rate, while any foreign exchange differences arising from this valuation are compared to exchange rate differences from the derivative. In order to measure the effectiveness of the hedge, the changes in the hedged item are compared to the changes in the hedging instrument, and in order for the hedge to qualify as effective the ratio of the change in the fair value of the hedging instrument over the change in the fair value of the hedged item should be between 80% - 125% (dollar offset method).

The Group recognizes the following sources which may lead to ineffective hedging:

a) The credit risk (counterparty risk) of the hedging instruments used to hedge the foreign currency risk which is minimized by entering into transactions with counterparties which are also covered with collateral agreements.

b) The difference in the timing of settlement of hedging instruments and hedged items.

During the year, no other sources of ineffectiveness were identified.

The hedging instruments as at 31.12.2020 are summarized as follows:

	Currency	Nominal amount in Euro
Investment in Alpha Bank London		**Duration < 1 year**
FX Swaps - EUR/GBP	GBP	54,851
Exchange rate GBP/EUR	0.89	
Investment in subsidiaries (RON)		**Duration < 1 year**
Deposit amount RON	RON	287,575
Exchange rate RON/EUR	4.87	
Forward transactions CCIRS -EUR/RON	RON	95,151
Exchange rate RON/EUR	4.87	

165 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The hedging instruments as at 31.12.2019 are summarized as follows:

	Currency	Nominal amount in Euro
Investment in Alpha Bank London		**Duration < 1 year**
FX Swaps - EUR/GBP	GBP	57,506
Exchange rate GBP/EUR	0.85	
Investment in subsidiaries (RON)		**Duration < 1 year**
Deposit amount RON	RON	292,703
Exchange rate RON/EUR	4.78	
Forward transactions CCIRS -EUR/RON	RON	96,848
Exchange rate RON/EUR	4.78	

The balance sheet and the income statement amounts relating to hedging of net investment in foreign subsidiaries and the effectiveness of the hedge are analyzed as follows:

31.12.2020						
Hedging instrument	**Assets**	**Liabilities**	**Line item in the balance sheet where the hedge item is included**	**Change in fair value of hedging instrument for the measurement of the hedge effectiveness for the year 2020**	**Change in the fair value of the hedging instrument recognized in the reserve for the year 2020**	**Change in the fair value of the hedging instrument recognized in the income statement in the year 2020**
FX Swaps - EUR/GBP	402		Derivatives	3,090	3,090	
Deposit amount in RON		287,575	Due to customers	5,129	5,129	
Forward transactions CCIRS - EUR/RON		1,930	Derivatives	1,697	1,697	

31.12.2019						
Hedging instrument	**Assets**	**Liabilities**	**Line item in the balance sheet where the hedge item is included**	**Change in fair value of hedging instrument for the measurement of the hedge effectiveness for the year 2019**	**Change in the fair value of the hedging instrument recognized in the reserve for the year 2019**	**Change in the fair value of the hedging instrument recognized in the income statement in the year 2019**
FX Swaps - EUR/GBP	71		Derivatives	(2,815)	(2,815)	
Deposit amount in RON		292,703	Due to customers	7,500	7,500	
Forward transactions CCIRS - EUR/RON		3,418	Derivatives	2,482	2,482	

The amounts related to hedged items as of 31.12.2020 and 31.12.2019 are analyzed as follows:

31.12.2020			
	Change in fair value for the measurement of the hedge effectiveness	**Foreign Exchange differences reserve**	**Balance of foreign exchange differences reserve due to discontinued hedging relationships**
Investment in Alpha Bank London	(1,402)	(17,035)	
Investment in subsidiaries (RON)	51,266	(32,037)	

31.12.2019			
	Change in fair value for the measurement of the hedge effectiveness	**Foreign Exchange differences reserve**	**Balance of foreign exchange differences reserve due to discontinued hedging relationships**
Investment in Alpha Bank London	(4,491)	16,718	
Investment in subsidiaries (RON)	45,905	(30,455)	

 The amounts are presented in thousands of Euro unless otherwise indicated

19. Loans and advances to customers

	31.12.2020	31.12.2019
Loans measured at amortised cost	47,260,897	46,880,841
Leasing	611,137	589,173
Less: Allowance for expected credit losses	(9,079,938)	(8,682,370)
Total	**38,792,096**	**38,787,644**
Advances to customers measured at amortised cost	267,024	171,489
Advances to customers measured at fair value through profit or loss	40,000	
Loans measured at fair value through profit or loss	280,882	307,136
Loans and advances to customers	**39,380,002**	**39,266,269**

As at 31.12.2020, "Advances to customers measured at amortised cost" include allowance for expected credit losses amounting to € 47,227 (31.12.2019: € 41,011).

The advances to customers measured at amortized cost on 31.12.2020 include the net receivable consideration amounting to € 105,692 from the sale of the non-performing loan portfolio completed on 17.7.2020, as further detailed in note 48, which is expected to be settled in cash within 3 years from the closing of the transaction.

In addition, advances from customers measured at fair value through profit or loss includes the fair value of receivable from variable payment of the abovementioned transaction for which the fair value was estimated at 31.12.2020 to € 40,000 (note 48).

Finance leases derived mainly from the activities of the subsidiary Alpha Leasing S.A..

The following tables, present an analysis of loans per type and category.

167 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Loans measured at amortised cost

	31.12.2020	31.12.2019
Individuals		
Mortgages:		
- Non-securitized	12,738,458	17,319,572
- Securitized	4,154,487	
Consumer:		
- Non-securitized	1,986,207	3,510,938
- Securitized	2,121,090	645,948
Credit cards:		
- Non-securitized	456,239	721,165
- Securitized	717,543	576,367
Other	1,368	1,341
Total loans to individuals	**22,175,392**	**22,775,331**
Corporate:		
Corporate loans:		
- Non-securitized	18,966,318	21,164,093
- Securitized	5,695,755	2,416,455
Leasing:		
- Non-securitized	366,137	358,293
- Securitized	245,000	230,880
Factoring	423,432	524,962
Total corporate loans	**25,696,642**	**24,694,683**
Total	**47,872,034**	**47,470,014**
Less: Allowance for expected credit losses	(9,079,938)	(8,682,370)
Total loans measured at amortised cost	**38,792,096**	**38,787,644**

In the context of the reassessment of the hold to collect business model of loans and advances to customers, past sales are taken into account.

Considering that:

- the majority of the Group's sales are in accordance with the Group's business model as they concern sales of non-performing loans due to the credit rating deterioration of the debtor and
- individual sale are not considered material both individually and in aggregate. The sales are considered consistent with the Group's business model for loans and advances to customers,

the Group has assessed that the sales are consistent with the existing business model for loans and advances to customers.

On 30.4.2020 the Bank completed, in accordance with the provisions of article 10 of Law 3156/2003, the procedures for the securitization of loans receivables and / or consumer, mortgage and corporate credits to special purpose entities of Law 3156/2003, established in the Republic of Ireland. This transaction is part of the strategic plan 2020-2022, as mentioned in note 51.

In particular, the Bank transferred loan portfolios to four special purpose entities set up for this purpose, which in turn issued bonds. The Bank acquired those bonds and maintained in all cases the risks and rewards deriving from the securitized portfolios, and has not derecognized the loans. In addition, the Group exercises control over those special purpose vehicles, which are included in the consolidated financial statements, as it is mentioned in note 40.

The carrying amount of the securitized loans at amortised cost of the above transaction amounted to € 6,043,792 as at 31.12.2020.

Furthermore, in previous years, the Bank has proceeded with the securitization of other consumer and corporate loans and credit cards through controlled special purpose entities. Based on the contractual terms and structure of the above transactions (e.g. guarantees or/and credit enhancement or due to the Bank owes the notes issued by the special purpose entities), the Bank retained in all cases the risks and rewards deriving from securitized portfolios.

168 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Mortgage loans as at 31.12.2020 include loans amounting to € 3,370,323 which have been used as collateral in the Covered Bond Issuance Program I and Covered Bond Issuance Program II of the Bank and the Direct Issuance Covered Bond Program of Alpha Bank Romania.

Mortgage loans as at 31.12.2019 include loans amounting to € 4,651,208 which have been used as collateral, in the following covered bonds programs: Covered Bond Programe I, Covered Bond Programe II, Secured Note Program, as well as the Direct Issuance Covered Bond Program of Alpha Bank Romania.

According to the Business Plan relating to the management of Non Performing Exposures, that the Bank submitted on 5 October 2020 and has been prepared in accordance with the methodology and models of the supervisory authorities, the Bank is obliged to monitor and report to the SSM the level of the achievement of the targets set in the Business Plan on a consolidated basis, until the end of 2022, through relevant supervisory reports. As at 31.12.2020, the balance of the NPE loans included in total loans and advances to customers amounted to € 20.9 billion (31.12.2019: € 21.8 billion).

The carrying amount of loans guaranteed by the Guarantee Fund Covid-19 and with interest rate subsidy from the Entrepreneurship Fund II of the Hellenic Development Bank amounts to € 1,399,143 on 31.12.2020 and is included in the balance of loans measured at amortized cost. For the above loans the allowance for expected credit losses recognized as at 31.12.2020 amounts to € 4,546.

The movement of allowance for expected credit losses on loans, that are measured at amortized cost, is presented below:

Allowance for expected credit losses

Balance 1.1.2019	**10,977,339**
Changes for the year 1.1. - 31.12.2019	
Impairment losses for the year	901,807
Transfer of allowance for expected credit losses to Assets held for sale	(1,092,194)
Derecognition due to substantial modifications in loans' contractual terms	(53,978)
Change in present value of the impairment losses	66,101
Foreign exchange differences	26,517
Disposal of impaired loans	(95,711)
Loans written-off during the year	(2,033,487)
Other movements	(14,024)
Balance 31.12.2019	**8,682,370**
Changes for the year 1.1 - 31.12.2020	
Impairment losses for the year	1,263,988
Derecognition due to substantial modifications in loans' contractual terms	(9,038)
Change in present value of the impairment losses	117,495
Foreign exchange differences	(16,441)
Disposal of impaired loans	(77)
Loans written-off during the year	(959,213)
Other movements	854
Balance 31.12.2020	**9,079,938**

169 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

"Impairment losses" for 2020, does not include impairment loss of € 22,209 (31.12.2019: € 77,479) which relates to impairment losses for loans classified as held for sale and the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) which is included in the carrying amount of the loans.

Finance lease receivable are analyzed by duration as follows:

	31.12.2020	31.12.2019
Up to 1 year	262,970	279,066
From 1 year to 5 years	227,312	251,398
Over 5 years	180,018	189,953
	670,300	**720,417**
Non accrued finance lease income	(59,163)	(131,244)
Total	**611,137**	**589,173**

The net amount of finance lease receivables are analyzed as follows, based on their duration:

	31.12.2020	31.12.2019
Up to 1 year	250,926	266,807
From 1 year to 5 years	200,586	191,548
Over 5 years	159,625	130,819
Total	**611,137**	**589,173**

It is noted that the reduction in receivables from finance leases amounts to € 1,531 due to a sublease modification (reduction in duration) which resulted in the discounting of new cash flows at the initial IBR rate and the difference from the carrying amount to be recognized as impairment loss.

There has been no significant impact from the application of the rent concession measures on the receivable from finance leases.

Loans measured at fair value through profit or loss

	31.12.2020	31.12.2019
Individuals		
Consumer:		
- Non-securitized		450
Total loans to individuals	**-**	**450**
Corporate:		
Corporate loans:		
- Non-securitized	176,342	290,725
- Securitized	104,540	15,961
Total corporate loans	**280,882**	306,686
Total loans to customers measured at fair value through profit or loss	**280,882**	**307,136**

As at 31.12.2020, securitized loans amounting to € 104,540 are included in the securitization transaction of loan receivables and/or consumer, mortgage and corporate credits as detailed described in note 48.

170 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

20. Investment securities

	31.12.2020	31.12.2019*
Investment securities measured at fair value through other comprehensive income	6,577,698	7,519,930
Investment securities measured at amortised cost	3,335,733	1,070,730
Investment securities measured at fair value through profit or loss	137,675	93,110
Total	**10,051,106**	**8,683,770**

An analysis of investment securities is provided in the following tables per classification category and per type of security.

a. Investment Securities measured at fair value through other comprehensive income

	31.12.2019	31.12.2019*
Greek Government		
- Bonds	2,007,494	3,762,374
- Treasury bills	763,520	217,965
Other Governments		
- Bonds	1,831,950	1,925,647
- Treasury bills	16,257	55,647
Other issuers		
- Listed	1,902,890	1,487,635
- Non listed	8,700	17,896
Equity securities		
- Listed	18,074	14,699
- Non Listed	28,813	38,067
Total	**6,577,698**	**7,519,930**

Equity instruments measured at fair value through other comprehensive income

The Group has made the irrevocable election on initial recognition to measure at fair value through other comprehensive income equity instruments that have the following charasteristics:

a) Shares in companies of the financial sector (credit institutions and interbank companies)

b) Investments in private equity (shares of venture capital or private equity) and

c) Share held in long term investment horizon

The following table presents the shares of investment portfolio measured at fair value through other comprehensive income as of 31.12.2020 and as of 31.12.2019.

	Fair value 31.12.2020	Dividend income from 1.1 to 31.12.2020	Fair value 31.12.2019*	Dividend income from 1.1. to 31.12.2019*
Investments in financial industry entities	5,429	757	13,718	637
Private equity investments	19,844		21,453	
Long-term equity holdings	21,614	1,693	17,595	259
Total	**46,887**	**2,450**	**52,766**	**897**

(*) Certain amounts have been restated. See note 50.

The Group, from 1.1.2019, retrospectively adjusted VISA Inc shares from the securities at fair value through other comprehensive income directly in equity to the securities valued at fair value through other comprehensive income as detailed described in note 50.

Within the year 2020, for liquidity reasons, the Group proceeded with the disinvestment of shares held in V Telecom Investments SCA and V Telecom Investment GEN Partner S.A., with a total fair value of € 478 at the date of sale. From the aforementioned sales, no result was recognized.

* Certain figures of the previous year have been restated as described in note 50.

171 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In addition, in 2020 the Group proceeded with the divestment of its equity holding in Mastercard, following the participation in the Open Conversion and Sale Program announced by the company, according to which the right to convert Class B shares of the Group with issued traded Class A shares was exercised. The issued Class A shares, which were classified in the category of shares valued at fair value through profit or loss, were sold within the year and the result from the initial recognition and the sale of shares was recognized in gains less losses on financial transactions (note 5).

It is also pointed out that after the full acquisition of Cepal Holdings by the Bank on 22.7.2020, as specifically analyzed in note 40, the preferred shares that were classified in the investment portfolio are now a cost to the subsidiary that is eliminated in the consolidation.

The Group during 2019, either for liquidity purposes or due to squeeze out, proceeded with the disinvestment of shares held in Piraeus Bank and in Pillarstone Bidco SCA with total fair value amounted to € 63.The above sales resulted in a loss of € 0.1, compared to their initial cost of acquisition.

b. Investment Securities measured at fair value through profit or loss

Investment Securities measured at fair value through profit or loss include securities for which it was assessed that their contractual cash flows do not meet the solely payments of principal and interest (SPPI) criterion in of IFRS 9 as well as reclassified in this category.

	31.12.2020	31.12.2019*
Other Governments		
- Bonds		9,025
Other issuers		
- Listed	10,870	10,741
- Non listed	2,373	2,815
Shares		
- Listed	6,064	2,133
- Non listed	32,836	493
Other variable yield securities	85,532	67,903
Total	**137,675**	**93,110**

c. Investment Securities measured at amortized cost

	31.12.2020	31.12.2019
Greek Government		
- Bonds	2,779,179	1,070,730
Other Governments		
-Bonds	494,828	
Other issuers		
- Listed	61,726	
Total	**3,335,733**	**1,070,730**

The Group classified in "Investment securities measured at amortized cost" Greek Government bonds purchased in 2019 as the original assessment of their business model expected to hold to maturity given the satisfactory level of yields. During 2020 following new purchases the balance of the portfolio increased to € 2,265,003. For the above investment securities, measured at amortized cost, accumulated expected credit loss of € 10,332 (31.12.2019: € 7,413) have been recognised. The gross carrying amount amount to € 3,346,065 (31.12.2019: € 1,078,143).

* Certain figures of the previous year have been restated as described in note 50.

172 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

21. Investments in associates and joint ventures

	31.12.2020	31.12.2019
Opening balance	13,385	23,194
New associates/joint ventures	15,399	
Reclassification of APE Commercial Property	3,917	
Classification of Cepal as subsidiary	(1,550)	
(Returns)/Increases of share capital	579	2,794
Share of profit/(loss) and other comprehensive income	(1,014)	(12,603)
Total	**30,716**	**13,385**

During 2020, the associate company Perigenis Commercial Real Estate S.A., with a total value of € 15,399 was added to the Group, while in the year 2019 there were no new investments in associates and joint ventures.

"New associates/joint ventures" relates to the share capital increase of joint venture Alpha TANEO AKES by € 579 whereas the respective balance of the prior year relates to the share capital increase of the associates Olganos A.E for € 122, Alpha Investment Property Elaionas A.E for € 2,500 and the joint venture Alpha TANEO AKES for € 137.The associates and joint ventures of the Group are the following:

		Group's ownership interest %	
Name	**Country**	**31.12.2020**	**31.12.2019**
a. Associates			
AEDEP Thessalias and Stereas Ellados	Greece	50.00	50.00
A.L.C Novelle Investments Ltd	Cyprus	33.33	33.33
Olganos A.E.	Greece	30.44	30.44
Bank Information Systems A.E	Greece	23.77	23.77
Propindex A.E.D.A.	Greece	35.58	35.58
Cepal Holdings A.E.*	Greece		38.61
Famar S.A.	Greece	47.04	47.04
Alpha Investment Property Elaionas A.E.	Greece	50.00	50.00
Perigenis Commercial Property A.E.	Greece	32.00	
b. Joint ventures			
APE Commercial Property A.E	Greece	72.20	72.20
APE Investment Property A.E.*	Greece	71.08	71.08
Alpha TANEO A.K.E.S.	Greece	51.00	51.00
Rosequeens Properties Ltd*	Cyprus	33.33	33.33
Panarae Saturn LP	Jersey	61.58	61.58
Alpha Investment Property Commercial Stores A.E.	Greece	70.00	70.00

* Companies are parent group entities as mentioned in note 40.

173 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The Group's share in equity and profit/(loss) of each associate and joint venture is set out below:

	Group's share on equity		Share of profit/(loss)		Share of other comprehensive income in equity	
	From 1 January to		From 1 January to		From 1 January to	
Name	31.12.2020	31.12.2019	31.12.2020	31.12.2019	31.12.2020	31.12.2019
a.Associates						
AEDEP Thessalias and Stereas Ellados	73	73				
A.L.C. Novelle Investments Ltd	412	415	(3)	(6)		
Olganos A.E.				(122)		
Bank Information Systems AE	227	162	65			
Propindex A.E.D.A	78	78				
Cepal Holdings A.E.		2,175	(626)	(1,524)		
Alpha Investment Property Elaionas A.E.	864	2,002	(1,139)	(10,803)		
Perigenis Commercial Property A.E.	15,363		(37)			
Total (a)	**17,017**	**4,905**	**(1,740)**	**(12,455)**	**-**	**-**
b. Joint ventures						
Alpha TANEO A.K.E.S.	3,794	2,848	368	(344)		
Rosequeens Properties Ltd	(9)		(8)	(1)		
Panarae Saturn LP	1,509	1,168	341	275		
Alpha Investment Property Commercial Stores A.E.	4,488	4,464	25	(78)		
APE Commercial Property A.E.	3,917					
Total (b)	**13,699**	**8,480**	**726**	**(148)**		**-**
Total (a) + (b)	**30,716**	**13,385**	**(1,014)**	**(12,603)**		**-**

Investments in significant associates and joint ventures

The Group considers as significant the associate companies and joint ventures that it participates in, by taking into account the activities that are considered to be of strategic importance, the book value of the Group's investments and the loans and receivables that consist part of the Group's net investment in the companies, if any.

On the basis of the above, the associate company AEP Elaionas A.E., Perigenis Commercial Property A.E. and the joint ventures APE Investment Property A.E. are considered material.

It is noted that Cepal Holdings S.A., which was evaluated for the year 2019 as a significant associate, was transferred to subsidiaries during 2020, as described in note 40, since on 27.7.2020 the Group ontained control of the company through the acquisition of 100% of its share capital.

AEP Elaionas mainly carries out activities relating to building construction and real estate exploitation.

Perigenis Commercial Property A.E. has as objective the management of real estate properties that obtains from the restructuring of specific loans, such as their purchase and sale, their construction and exploitation.

APE Commercial Property A.E. carries out activities mainly relating to the acquisition of investments and real estate assets and it has been characterized as a consortium due to the fact that the contractual agreement to exercise control requires a unanimous decision of its Shareholders.

All the above mentioned companies are established in Greece, are not listed on a regulated market and therefore there is not a reference value for their fair value. With the exception of the associates and joint ventures that have been classified as Assets held for sale and are valued in accordance with the provisions of IFRS 5, the other associates and joint ventures are valued using the equity method.

It is noted that in 2019, an amount of goodwill of € 9.701 that derived from the Group's acquisition of 50% of the associate company AEP Elaionas A.E., has been fully impaired. The above mentioned amount is included in the Share of profit / (loss) and other comprehensive income".

174 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Condensed financial information of AEP Elaionas A.E., Cepal Holdings S.A (only comparative figures) and Perigenis Commercial Property A.E., accounted for under the equity method, are presented below. For APE Investment Property A.E., that was classified at Assets held for sale, the disclosures required by IFRS 5 are provided in note 48.

Alpha Investment Property Elaionas A.E.

Condensed Statement of Total Comprehensive Income

	31.12.2020	31.12.2019
Interest and similar expenses	(1,753)	(1,726)
Other expenses	(524)	(406)
Profit/(losses) before income tax	**(2,277)**	**(2,132)**
Income tax		
Profit/(losses) for the year	**(2,277)**	**(2,132)**
Other comprehensive income		
Other comprehensive income for the year after income tax	**(2,277)**	**(2,132)**
Amount attributed to the participation of the Group to profits/(losses) of the associate	(1,139)	(10,803)

No dividends have been received from the entity within the years 2020 and 2019.

Condensed Balance Sheet

ASSETS	31.12.2020	31.12.2019
Other current assets	9	44
Total current assets	**9**	**44**
Non-current assets	111,432	111,433
Short-term liabilities	1,403	712
Total Short-term liabilities	**1,403**	**712**
Long-term financial liabilities	108,309	106,757
Total long-term liabilities	**108,309**	**106,757**
Total equity	**1,728**	**4,004**
Group participation (%)	50,00%	50,00%
Equity shareholding	864	2,002
Goodwill from the acquisition		
Carying amount of participation	864	2,002
Loan that is part of the net investment	55,419	53,988
Net investment	**56,283**	**55,990**

175 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Cepal Holdings A.E.

Condensed Statement of Total Comprehensive Income

	31.12.2019
Interest and similar expenses	(62)
Commission expense	(5)
Gains less losses on financial transactions	(63)
Other income	22,988
General Administrative Expenses	(26,637)
Depreciation	(964)
Profit/(losses) before income tax	**(4,743)**
Income tax	798
Profit/(losses) for the year	**(3,945)**
Other comprehensive income	
Total comprehensive income after income tax	**(3,945)**
Amount attributed to the participation of the Group to profits/(losses) of the associate	**(1,524)**

No dividends have been received from the entity within the year 2019.

Condensed Balance Sheet

ASSETS	31.12.2019
Cash and cash equivalents	1
Other current assets	9,469
Total current assets	**9,470**
Non current assets	**9,260**
Short-term liabilities	8,567
Total short-term liabilities	**8,567**
Total Equity	**10,163**
Less: Preference shares	(18,938)
Equity excluding preference shares	**(8,775)**
Group's share of results	(4,101)
Cost of acquisition	6,276
Book value of participation	2,175

The Group does not participate in joint operations schemes.

Perigenis Commercial Property A.E

Condensed Statement of Total Comprehensive Income

	31.12.2020
Interest and similar expenses	(6)
General Administrative Expenses	(79)
Depreciation	(32)
Profit/(losses) before income tax	**(117)**
Income tax	
Profit/(losses) for the year	**(117)**
Other comprehensive income	
Total comprehensive income after income tax	**(117)**
Amount attributed to the participation of the Group to profits/(losses) of the associate	(37)

176 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

No income from dividends occurred during the fiscal year 2020.

Condensed Balance Sheet

ASSETS	31.12.2020
Other current assets	37,202
Total current assets	**37,202**
Non current assets	**10,841**
Total Equity	**48,043**
Group's share of results	32.00%
Equity shareholding	15,374
Book value of participation	**15,363**

Other information for associates and joint ventures and significant restrictions

Apart from the associates and the joint ventures that have been classified as Assets Held for Sale and are accounted for in accordance with the provisions of IFRS 5, the rest of the associates and the joint ventures are accounted for using the equity method.

There are no cases where the Group has ceased recognizing its portion to losses of associates and joint ventures due to the full impairment of its participation to them.

The Group has no contingent liabilities regarding its participation in associates or joint ventures. The Bank has the obligation to contribute with additional funds in the share capital of the joint venture Alpha TANEO AKES up to the amount of € 23. Further to this, there are no other unrecognized commitments of the Group relating with its participation in associates and joint ventures which could result in future cash or other outflows.

There are no significant restrictions for the associates or joint ventures to transfer capital in the Group or to repay the loans that have been granted by the Group apart from the restrictions imposed by Law 4548/2018 for Greek companies regarding the minimum amount of share capital and equity required, and the ability to distribute dividends.

Moreover, the restrictions that have been imposed by the adoption of Ministerial Legislative Act within 2015 and were referred to cash withdrawals and free capital flows, ceased to be effective during the fiscal year 2019, according to an amendment incorporated in Law 4624/2019, causing the complete elimination of the existing restrictions on capital flows.

177 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

22. Investment property

	Land – Buildings	Rights-of-use on Land and Buildings	Total
Balance 1.1.2019			
Acquisition Cost	639,497		639,497
Accumulated depreciation and impairment losses	(146,336)		(146,336)
1.1.2019 - 31.12.2019			
Impact from the implementation of IFRS 16		**10,319**	**10,319**
Net book value 1.1.2019	**493,161**	**10,319**	**503,480**
Additions	80,444		80,444
Additions from expenses capitalization	2,246		2,246
Additions from companies consolidated for the first time in the year	24,661		24,661
Reclassification to "Property, Plant and Equipment"	(729)	(1,012)	(1,741)
Reclassification to "Assets held for sale"	(62,821)		(62,821)
Foreign Exchange differences	(704)		(704)
Disposals / Write-offs / Terminations	(40,708)		(40,708)
Depreciation charge for the year	(9,459)	(917)	(10,376)
(Impairment) / Reversal of Impairment for the year	(9,700)	1,055	(8,645)
Net book value 31.12.2019	**476,391**	**9,445**	**485,836**
Balance 31.12.2019			
Acquisition Cost	562,086	10,765	572,851
Accumulated depreciation and impairment losses	(85,695)	(1,320)	(87,015)
1.1.2020 - 31.12.2020			
Net book value 1.1.2020	**476,391**	**9,445**	**485,836**
Additions	40,834		40,834
Additions from expenses capitalization	741		741
Additions from companies consolidated for the first time in the year	103,035		103,035
Reclassification to "Property, Plant and Equipment"	12,156		12,156
Reclassification to "Assets held for sale"	(30,375)		(30,375)
Foreign Exchange differences	994		994
Disposals / Write-offs / Terminations / Reassessment		(11,369)	(11,369)
Disposals / Write-offs / Terminations	(19,029)		(19,029)
Depreciation charge for the year	(7,221)	(822)	(8,043)
(Impairment) / Reversal of Impairment for the year	(13,752)	8,852	(4,900)
Net book value 31.12.2020	**563,771**	**6,106**	**569,877**
Balance 31.12.2020			
Acquisition Cost	662,304	7,820	670,124
Accumulated depreciation and impairment losses	(98,533)	(1,714)	(100,247)

178 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The fair value of investments in land and buildings as at 31.12.2020 amounts to € 612,258 (31.12.2019: € 522,739).

In 2020 an impairment loss amounting to € 13,752 (31.12.2019: € 8,645), was recognized, in order for the carrying amount of investment property not to exceed the recoverable amount as at 31.12.2020, as the latter was estimated by certified valuers. The impairment amount was recognized in 'Other Expenses'. The recoverable amount of investment property, which was impaired during the current year, amounted to € 60,353 (31.12.2019: € 45,766).

The fair value of the investment property is calculated in accordance with the methods mentioned in note 1.2.7 and are classified, in terms of fair value hierarcy, in Level 3 since assumptions and inputs relating to properties of relevant characteristics are used for the determination of fair value and therefore encompass a wide range of unobservable market inputs. The capitalization rate used ranges between 6.5% and 8%.

It is noted that further to the updated reports obtained by the competent divisions of the Bank relating to the effect of Covid-19 on the values of real estate properties and based on the assumptions of the basic scenario relating to the evaluation of the pandemic and its effect on the values of the properties, and considering recent data from realized property sales by the Group to third parties, it is estimated that the prices of Group's properties have not been affected by the pandemic in order to merit further impairment in the fair values.

In 2020, the Group transferred own use assets of € 12,156 to Investment properties, which mainly concern buildings leased to third parties.

Information about the caption "Reclassification to Assets held for sale" is presented in note 48.

"Additions" of the current year as well as the "additions from companies that were consolidated for the first time in the year" mainly relates to investment in properties acquired in the context of the credit risk management of the Group from real estate loan collaterals.

Following the implementation of IFRS 16, effective from 1.1.2019, the Group recognized a right-of-use on Land and Buildings amounting to € 10,319, related to real estate leases, recognized as investment property, since they are subleased under operating lease agreements.

With regards to the right-of-use assets, in the year 2020, a reversal of impairment amounting to € 8,852 (2019: € 1,055) was recognized under "Other Expenses". The recoverable amound of right –of-use assets on buildings is equal to the discounted value of the rental receivables from subleases.

The Group, as a lessor of buildings owned by third parties, recognizes in the results of the period rental income.

Future receipts from operating leases are as follows:

	31.12.2020	31.12.2019
Up to 1 year	6,973	8,463
From 1 year to 5 years	15,385	24,038
Over 5 years	1,646	14,601
Total	**24,004**	**47,102**

Future income from finance leases are disclosed in note 19.

Income from operating leases for 2020 amount to € 10,211 (31.12.2019: € 15,336) and are included in "Other income".

The Group as a lessor did not have a material impact from the implementation of the lease concession measures in response to the Covid-19 pandemic which amounted to € 1,349.

179 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

23. Property, plant and equipment

	Land and Buildings	Leasehold improvements	Equipment	Rights-of-use on fixed assets	Total
Balance 1.1.2019					
Acquisition Cost	896,655	3,237	471,635		1,371,527
Accumulated depreciation and impairment losses	(247,749)	(2,886)	(386,229)		(636,864)
1.1.2019 - 31.12.2019					
Impact from the implementation of IFRS 16		**(351)**		**157,871**	**157,520**
Net book value 1.1.2019	**648,906**		**85,406**	**157,871**	**892,183**
Additions	10,570		31,895	20,094	62,559
Disposals / Write-offs / Terminations / Reassessments	(1,651)		(97)	(9,678)	(11,426)
Reclassification from "Investment Property"	729			1,012	1,741
Reclassification to "Other Assets"	(3,057)				(3,057)
Reclassification to "Assets held for sale"	(9,920)		(89)		(10,009)
Reclassification within "Property, Plant and Equipment			163	(163)	-
Foreign Exchange differences	(319)		(85)	(3,055)	(3,459)
Depreciation charge for the year	(18,255)		(20,037)	(32,797)	(71,089)
Impairment losses for the year	(1,164)			(3,947)	(5,111)
Net book value 31.12.2019	**625,839**	**-**	**97,156**	**129,337**	**852,332**
Balance 31.12.2019					
Acquisition Cost	894,307		502,586	168,654	1,565,547
Accumulated depreciation and impairment losses	(268,468)		(405,430)	(39,317)	(713,215)
1.1.2020 - 31.12.2020					
Net book value 1.1.2020	**625,839**		**97,156**	**129,337**	**852,332**
Additions	7,522		25,353	15,319	48,194
Additions from companies consolidated for the first time in the year	979		3,035		4,014
Reassessments /Disposals / Write-offs /Terminations / Destructions	(891)		(1,978)	(5,054)	(7,923)
Reclassification to “Investment Property”	(12,156)				(12,156)
Reclassification to “Other assets”	(837)				(837)
Reclassification to “Assets held for sale”			(324)		(324)
Foreign Exchange differences	1,484		(426)	(2,146)	(1,088)
Depreciation charge for the year	(17,143)		(29,860)	(32,150)	(79,153)
Impairment losses for the year	(10,415)			3,686	(6,729)
Net book value 31.12.2020	**594,361**	**-**	**92,978**	**108,992**	**796,331**
Balance 31.12.2020					
Acquisition Cost	840,090		523,764	172,178	1,536,032
Accumulated depreciation and impairment losses	(245,729)		(430,786)	(63,186)	(739,701)

The recoverable amount of plant, property and equipment which were impaired during 2020, amounted to € 239,752 (31.12.2019: € 9,920), while an impairment loss of € 10,415 (31.12.2018: € 1,164) was recorded in “Other Expenses”.During the impairment test of property, the estimation of the recoverable amount is based on the value in use, which incorporates in the value of the asset all the improvements realized as necessary to bring the asset in an appropriate condition to be used by the Group. The discount rates used range between 6.5% and 8% depending on the characteristics (location, size use) of each asset.

The fair values of the properties are calculated in accordance with the methods described in note 1.2.7 and are classified, in terms of fair value hierarchy, in Level 3 since assumptions and inputs relating to properties of relevant characteristics are used for the determination of fair value and therefore encompass a wide range of unobservable market inputs.

It is noted that further to the updated reports obtained by the competent divisions of the Bank relating to the effect of Covid-19 on the values of real estate properties in Greece it is estimated that these values have not been affected by the pandemic in order to merit further impairment in the fair values.

180 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In addition, the Group did not have an impact from the application of the lease concession measures, given that the Bank and the Group companies, as tenants, have not been favored in this regard.

The Group, in 2020 transferred properties amounting of € 12.156 to the Investment property portfolio, as described in note 22.

Information on the transfers to Assets held for sale is presented in note 48.

Following the implementation of the new accounting standard, IFRS 16, effective from 1.1.2019, the Group recognized a right-of-use on plant, property and equipment amounting to € 157,871, out of which an amount of € 146,810 relates to property leases. Additionally, due to the implementation of IFRS 16, existing leases of € 351, which according to the former accounting standard were recognized as finance leases and were included in the "Leasehold improvements" category, were reclassified to the "Right-of-use on fixed assets" at the amount of € 157,871.

With regards to the right of use assets, in 2020 there were no transfers from the "Investment properties" while in 2019 assets of € 1.012 (note 22) were transferred and a loss of € 55 was recognized (31.12.2019: € 3,947) as well as a reversal of impairment of € 3,741 (31.12.2019: € 0) recorded in "Other Expenses".

24. Goodwill and other intangible assets

	Goodwill	Software	Other intangible	Total
Balance 1.1.2019				
Acquisition Cost		787,082	141,487	928,569
Accumulated depreciation and impairment losses		(396,915)	(97,561)	(494,476)
1.1.2019 - 31.12.2019				
Net book value 1.1.2019		**390,167**	**43,926**	**434,093**
Additions		121,861		121,861
Disposals / Write-offs		(405)		(405)
Foreign exchange differences		(135)		(135)
Amortisation charge for the year		(48,618)	(14,450)	(63,068)
Net book value 31.12.2019		**462,870**	**29,476**	**492,346**
Balance 31.12.2019				
Acquisition Cost		908,034	141,484	1,049,518
Accumulated depreciation and impairment losses		(445,164)	(112,008)	(557,172)
1.1.2020 - 31.12.2020				
Net book value 1.1.2020		**462,870**	**29,476**	**492,346**
Additions		103,406	128	103,534
Additions from the companies consolidated during the year	62,229	19,339		81,568
Disposals / Write-offs		(1,225)		(1,225)
Foreign exchange differences		(71)	(2)	(73)
Amortisation charge for the year		(63,596)	(10,605)	(74,201)
Impairment losses for the year		(131)		(131)
Net book value 31.12.2020	**62,229**	**520,592**	**18,997**	**601,818**
Balance 31.12.2020				-
Acquisition Cost	62,229	1,009,289	141,641	1,213,159
Accumulated depreciation and impairment losses		(488,697)	(122,644)	(611,341)

Software additions of the year, relate mainly to purchase of licences and other applications of the Bank. Respectivelly, the goodwill addition of the year is attributable to the customer relations and the contracts for the management of loan portfolio deriving from the acquisition of 100% of Cepal Hellas on 22.07.2020 (note 40) as well as from the acquisition of the real estate company Acarta Construct Srl, as in detail described in note 40.

"Other intagible" include primarily intangible assets attributed to customer relationships by Diners' acquired credit card operations in 2015, with a useful life of 7 years, as well as customer relationships by Citibank's acquired deposit base in 2014 with 9 and 7 years of useful life respectively.

In software programs additions is included an amount of € 11,565, which concerns an internally produces computer applications. The depreciation for the year corresponding to these applications amounted to € 233.

In 2020, an impairment loss on Intangibles assets of € 131 (31.12.2019: € 0) was recognized in "Other Expenses".

182 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

25. Deferred tax assets and liabilities

	31.12.2020	31.12.2019
Assets	5,292,612	5,174,297
Liabilities	(34,679)	(31,865)
Total	**5,257,933**	**5,142,432**

Deferred tax assets and liabilities are analyzed as follows:

	1.1 - 31.12.2020						
	Balance 1.1.2020	Recognized in		Acquisition Cepal	Acquisition Acarta	Foreign exchange differences	Balance 31.12.2020
		Income Statement	Equity				
Debit difference of Law 4046/2012 (Note 13)	980,207	(44,555)					935,652
Debit difference of Law 4465/2017 (Note 13)	751,740	1,652,405					2,404,145
Write-offs, depreciation and impairment of fixed assets and leases	9,838	(14,761)			(6,492)		(11,415)
Loan portfolio	3,016,737	(1,634,180)					1,382,557
Valuation of loans due to hedging	236	(582)					(346)
Employee defined benefit and insurance funds	26,246	(1,625)	979				25,600
Valuation of derivatives financial instruments / Valuation cash flow hedge reserve	141,530	25,661	(6,044)				161,147
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	(11,065)	(555)					(11,620)
Valuation/impairment of investments	153,763	(8,918)					144,485
Valuation/impairment of debt securities and other securities	(81,640)	(24,776)	104,245				(2,171)
Tax losses carried forward	12,021	(3,754)		3,119			11,386
Other temporary differences	154,751	78,116		137		24	233,028
Currency translation differences from financial statements and net investment hedging of foreign operations	(11,932)		(2,943)				(14,875)
Total	**5,142,432**	**22,476**	**96,237**	**3,256**	**(6,492)**	**428**	**5,257,933**

183 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	1.1 - 31.12.2019*						
	Balance 31.12.2018	Impact from the implementation of IFRS 16	Balance 1.1.2019	Recognized in		Foreign exchange differences	Balance 31.12.2019
				Income Statement	Equity		
Debit difference of Law 4046/2012 (Note 13)	1,024,762		1,024,762	(44,555)			980,207
Debit difference of Law 4465/2017 (Note 13)	737,658		737,658	14,082			751,740
Write-offs, depreciation, impairment of fixed assets and leases	15,723	11,408	27,131	(17,293)			9,838
Loan portfolio	2,794,987		2,794,987	221,750			3,016,737
Valuation of loans due to hedging	(25)		(25)	261			236
Employee defined benefit and insurance funds	25,060		25,060	(2,072)	3,258		26,246
Valuation of derivatives financial instruments / Valuation cash flow hedge reserve	122,067		122,067	(18,371)	37,834		141,530
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	(10,720)		(10,720)	(345)			(11,065)
Valuation/impairment of investments	157,990		157,990	(4,227)			153,763
Valuation/impairment of debt securities and other securities	76,467		76,467	(13,751)	(144,356)		(81,640)
Tax losses carried forward	179,379		179,379	(167,358)			12,021
Other temporary differences	158,588		158,588	(4,292)		455	154,751
Currency translation differences from financial statements and net investment hedging of foreign operations	(9,854)		(9,854)		(2,078)		(11,932)
Total	**5,272,082**	**11,408**	**5,283,490**	**(36,171)**	**(105,342)**	**455**	**5,142,432**

* Certain figures of the previous year have been restated as described in note 50.

184 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

26. Other assets

	31.12.2020	31.12.2019
Tax advances and withholding taxes	192,567	174,059
Deposit and Investment Guarantee Fund	635,323	635,144
Property obtained from auctions and other property are held for sale	418,006	314,996
Prepaid expenses	31,158	15,072
Accrued income	6,329	6,217
Other	304,560	391,410
Total	**1,587,943**	**1,536,898**

"Deposit and Investment Guarantee Fund" relates to the Bank's participation in the assets of Investment Cover Scheme and Deposit Cover Scheme and comprises the following:

1. the amount of the contribution to the Investment Cover Scheme and
2. the difference on the regular annual contribution of credit institutions deriving from the application of article 6 of Law 3714/2008 "Borrowers protection and other provisions", which increase the upper coverage level for the amount of deposits guaranteed by the deposit guarantee scheme from € 20 to € 100 per depositor.

The above difference is considered, according to Law 4370/7.3.2016 in "Deposit Guarantee Scheme (transposition of Directive 2014/49/EU), Deposit and Investment Guarantee Fund and other regulations" a distinct group of assets, which are considered to be assets of the participating depository institutions according to their participation.

"Tax advances and withholding taxes" is presented, net of provisions amounted to € 64,763 in year 2020 (31.12.2019 € 101,037).

As at 31.12.2020 the Group measured "Property obtained from auctions and other property held for sale" at the lowest value between the carrying amount and fair value less costs to sell. For the cases where the fair value was lower than the carrying amount, an impairment loss of € 7,471 was recognized in "Other expenses" of the Income Statement. As at 31.12.2019 the relevant impairment loss amounted to € 483. The recoverable amount of the property which was impaired during the current year amounted to € 133,280 (31.12.2019: € 68,574)

The fair value of the assets has been estimated based on the methods mentioned in note 1.2.7 and are classified in terms of fair value hierarchy in Level 3, since is based on market research data, assumptions and inputs relating to properties of relevant characteristics and therefore encompass a wide range of unobservable market inputs. The capitalization rate used was between 6.5% and 8%.

It is noted that further to the updated reports obtained by the competent divisions of the Bank relating to the effect of Covid-19 on the values of real estate properties it is estimated that these values have not been affected by the pandemic in order to merit further impairment in the fair values.

In 2019, the Group transferred fixed assets with carrying amount € 1,238 from the "Assets held for sale" to the "Other Assets", while in 2020 it transferred fixed assets with carrying amount € 3,125 in from the "Assets held for sale" to "Other Assets" as described in note 23.

185 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

LIABILITIES

27. Due to Banks

	31.12.2020	31.12.2019
Deposits:		
- Current accounts	75,787	84,461
- Term deposits:		
Central Banks	11,868,432	3,064,446
Other credit institutions	56,559	245,775
Cash collateral for derivative margin account and repurchase agreements	9,688	17,058
Securities sold under agreement to resell (Repos)	526,431	6,278,454
Borrowing funds	565,959	567,942
Deposits on demand:		
- Other credit institutions	3,826	3,147
Total	**13,106,681**	**10,261,283**

In order to cope with the effects of Covid-19 pandemic, ensure adequate liquidity, normalize market's condition and support the credit expansion, European Central Bank gradually announced since March 2020 a series of measures such as amendment on terms of the Targeted Longer Term Refinancing Operations III and a new bunch of non-targeted longer term refinancing operations due to the pandemic (Pandemic Emergency Longer Term Refinancing Operations). On 24.06.2020 the Bank proceeded to the early termination of the borrowed amount of € 3,1 billion, through the existing program of targeted long term refinancing II (TLTRO II) with an interest rate of -0,40% and raised additional liquidity of € 11.9 billion through the Targeted Long Term Refinancing Operations III (TLTRO III) with an interest rate -0,50% while at the same date an amount of € 7.5 billion that was raised during the nine month period of 2020 through the Long-Term Refinancing Operations (LTRO) matured. It is noted that the interest rate of TLTRO III can reach -1% for the period from June 2020 to June 2021 and remain to -0.5% for the residual period until maturity, provided that the amount of loans falling under the program remain for the period between March 2020 and March 2021, at March 2020's levels. The ECB announced on 10.12.2020 a further amendment to the terms of the TLTRO III program, according to which if, in addition to the achievement of the target set for the period March 2020 – March 2021, loans for the period October 2020 - December 2021 remain at the levels of October 2020 the interest rate can be set at -1% for the next period from June 2021 to June 2022. The Bank recognized interest for the year 2020 based on the interest rate of -0.50%. On 31.12.2020 the funding from the TLTRO III program amounts to € 11.9 billion and interest income for the year 2020 amounts to € 31,568.

In particular, given that changes in the interest rate based on the level of the achievement of the objectives are contractually prescribed and that at the beginning of the financing it was not possible to make reliable estimates in regards to the level of achievement of the objectives set by the European Central Bank, the Bank considered that the effective interest rate of the loan is equal to the conventional one. This effective interest rate will be adjusted as a conventionally predetermined variable interest rate when the estimates for the achievement of the objectives become reliable and cumulative adjust of the amount recognized in interest income. It is also noted that the interest rate of this loan has not been treated as an off-market interest rate loan as the European Central Bank has provided it to all credit institutions under its supervision. Finally, it is noted that until the date of the preparation of the financial statements there had been no change in the Bank's estimates in regards to the level of achievement of the objectives in relation to the date of initial recognition of the loan.

Regarding the reduction in liabilities to other credit institutions, the increase of ECB funding led to reduction in repos transactions.

"Borrowing funds" includes liabilities due to European Investment Bank.

Interest income recognized in 2020 and 2019 from the above transactions is included in "Interest and related income" of the Income Statement.

186 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

28. Due to customers

	31.12.2020	31.12.2019
Deposits:		
- Current account	17,411,869	12,497,361
- Saving accounts	12,623,780	10,757,853
- Term deposits	13,638,804	16,956,187
Deposits on demand	51,070	46,060
	43,725,523	**40,257,461**
Cheques payable	105,417	106,823
Total	**43,830,940**	**40,364,284**

In 2020, due to customers increased by € 3,466,656 compared to the comparative year on the one hand due to the increase in private savings, as a result of the uncertainty caused by the pandemic and the reduced amount of consumer spending, as consumers cannot spend – in a degree - due to the measures of limiting the economic activity, and on the other hand due to the increase of the saving accounts of corporates, as a result of the restraint of the expenses, due to the uncertainty, but also due to the extraordinary measures adopted by the Greek Government in order to support businesses (e.g. provision of liquidity to businesses, which was provided through the banking system, suspension of tax payments and contributions to insurance funds).

29. Debt securities in issue and other borrowed funds

i. Covered bonds*

The following table presents covered bonds in detail:

Balance 1.1.2020	**711,647**
Changes for the year 1.1 - 31.12.2020	
Repurchases	(943)
Maturities / Repayments	(13,683)
Financial (gains)/losses	(68)
Accrued Interests	13,634
Balance 31.12.2020	**710,587**

The following tables presents additional information for the above mentioned issuances:

a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+0.5% Minimum 0%	23.1.2023	1,000,000	1,000,000
Alpha Bank S.A.	Euro	3m Euribor+0.5% Minimum 0%	23.1.2023	1,000,000	1,000,000
Alpha Bank S.A.	Euro	3m Euribor+0.35% Minimum 0%	23.1.2023	200,000	200,000
Alpha Bank S.A.	Euro	2,50%	5.2.2023	1,000	
Total				**2,201,000**	**2,200,000**

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	2.5%	5.2.2023	499,000	500,000
Alpha Bank Romania S.A.	Euro	6m Euribor+1.5%	16.5.2024	200,000	200,000
Total				**699,000**	**700,000**

* Financial disclosures regarding covered bond issues, as determined by the 2620/28.8.2009 Act of the Bank of Greece, have been published on the Bank's site.

187 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ii. Secured Note Program

On 25.10.2020 secured notes of nominal value amounting to € 800,000 expired.

The following table presents additional information for the above mentioned issuance:

Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+1.8%	25.10.2020		800,000
Total				-	**800,000**

iii. Senior debt securities

Balance 1.1.2020	**1,369**
Changes for the year 1.1 - 31.12.2020	
Maturities / Repayments	(43)
Accrued Interests	227
Balance 31.12.2020	**1,553**

The following table presents additional information for the above mentioned issuance:

Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	2.50%	20.6.2022	350	350
Alpha Bank S.A.	Euro	2.50%	20.6.2022	1,345	1,345
Total				1,695	**1,695**

iv. Liabilities from the securitization of shipping loans

Balance 1.1.2020	**154.936**
Change for the year 1.1 - 31.12.2020	
Acquisitions	(55.058)
Maturities/Repayments	(110.076)
Accrued interest	2.493
Foreign exchange differences	7.705
Balance 31.12.2020	-

The Bank has proceeded to a shipping loan securitization transaction, transferring the aforementioned loans to the fully consolidated Special Purpose Entity, Alpha Shipping Finance Ltd, which in turn raised funding from third parties.

On 21.9.2020 the Bank purchased the total liability to third parties and from that date, the Bank, consists the only lender of the special purpose entity Alpha Shipping Finance Ltd.

188 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following table presents additional information for the above mentioned liabilities:

a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Shipping Finance Ltd	USD	1m USD Libor+2.25%	20.9.2022	17,327	
Alpha Shipping Finance Ltd	USD	3m USD Libor+2.25%	20.9.2022	22,444	
Total				**39,771**	**-**

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Shipping Finance Ltd	USD	1m USD Libor+2.25%	20.9.2022		10,372
Alpha Shipping Finance Ltd	USD	3m USD Libor+2.25%	20.9.2022		144,059
Total				**-**	**154,431**

v. Liabilities from the securitization of consumer loans

The Bank has securitized consumer loans, by transferring these loans to a fully consolidated special purpose Entity, Katanalotika Plc, which in turn raised financing by issuing bonds. Within the fourth quarter of the fiscal year 2019 part of the bonds issued by the special purpose entity were transferred to third parties, while within the fourth quarter of the fiscal year 2020 the Bank repurchased these bonds with the result that on 31.12.2020 the Group had no liability due to this transfer. On 31.12.2019 the carrying amount of the Group's liability to third parties amounted to € 220,090.

Balance 1.1.2020	**220,090**
Changes for the year 1.1 - 31.12.2020	
Interest Repayments	(2,154)
Accrued Interest	2,064
Title Repurchases	(219,856)
Liability settlement results	(144)
Balance 31.12.2020	**-**

The following table presents additional information for the above mentioned issues:

a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Katanalotika Plc LDN - Class A	Euro	3m Euribor +2.60%, minimum 0%	17.12.2029	220,000	
Total				**220,000**	**-**

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Katanalotika Plc LDN - Class A	Euro	3m Euribor +2.60%, minimum 0%	17.12.2029		220,000
Total				**-**	**220,000**

189 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

On 18.12.2019 the interest rate spread was amended as follows: 1.45% for the payment date March 2020, 1.35% from payment date June 2020 to December 2020 and 2.60% for the remaining payment dates.

vi. Liabilities from the securitization of other loans

Liabilities arising from the securitization of consumer loans, business loans and credit cards are not included in "Debt securities in issue and other borrowed funds" because the respective securities with nominal amount of 2,433,735 (31.12.2019: 3,634,200) issued by special purpose entities and are held by the Bank.

The following table presents additional information for the above mentioned issuance:

Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Katanalotika Plc LDN - Class A	Euro	3m Euribor +2.6%, minimum 0%	17.12.2019	220,000	
Katanalotika Plc LDN - Class Z	Euro	3m Euribor +1%, minimum 0%	17.12.2029	360,000	360,000
Epihiro Plc LDN - Class A	Euro	6m Euribor +0.3%, minimum 0%	20.1.2035	400,000	785,600
Epihiro Plc LDN - Class B	Euro	6m Euribor, minimum 0%	20.1.2035	100,000	807,800
Pisti 2010-1 Plc LDN - Class A	Euro	2.50%	24.2.2026	369,300	369,300
Pisti 2010-1 Plc LDN - Class B	Euro	1m Euribor, minimum 0%	24.2.2026	216,900	216,900
Irida Plc LDN - Class A	Euro	3m Euribor +0.3%, minimum 0%	3.1.2039	261,100	261,100
Irida Plc LDN - Class B	Euro	3m Euribor, minimum 0%	3.1.2039	213,700	213,700
Alpha Quantum DAC	Euro	6m Euribor+4.5%	15.11.2023	292,735	299,800
Alpha Proodos DAC - Class B	Euro	3m Euribor+1.3%, minimum 0%	23.10.2020		100,000
Alpha Proodos DAC - Class C	Euro	3m Euribor+1.8%, minimum 0%	23.10.2020		220,000
Total				**2,433,735**	**3,634,200**

It is noted that on 20.7.2020 the issues of the securitization of business loans Epihiro PLC LDN - Class A and B amounting to € 385,600 and € 707,800, respectively, were partially repaid, while on 15.1.2020, a nominal amount of € 7,065 was repaid from the issuance of the security Alpha Quantum DAC. Also, on 23.10.2020 were canceled the Class B and Class C business loan securitization issues (SMEs) Alpha Proodos DAC amounting to € 100,000 and € 200,000 respectively.

vii. Liabilities from the securitization of non – performing loans

On 30.4.2020, the Bank has proceeded to a securitization transaction of non-performing consumer and corporate loans ("Galaxy"). More specifically, non performing loans were transferred to special purpose entities Orion X Securitisation Designated Activity Company, Galaxy II Funding Designated Activity Company, Galaxy III Funding Designated Activity Company and Galaxy IV Funding Designated Activity Company, established in Ireland, with an amount of € 6,148,332.

The liabilities that arose from the aforementioned securitization, are not included in the caption "Debt securities in issue and other borrowed funds", due to the fact that the respective securities of a total nominal value € 11,722,272, issued by the Special Purpose entities, have been purchased by the Bank and cost of acquisition was equal to the book value of the loans that were securitized.

190 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following table presents additional information for the above mentioned issuuance:

Held by the Group

Issuer	Rating	Currency	Interest Rate	Maturity	Nominal value
Orion X Secur. DAC DUB	High	Euro	0.75%	15.10.2060	879,000
Orion X Secur. DAC DUB	Medium	Euro	4%	15.10.2060	104,000
Orion X Secur. DAC DUB	Low	Euro	Available amounts after higher priority payment coverage	15.10.2060	940,688
Galaxy II Fund DESI ACTI DUB	High	Euro	0.75%	15.10.2060	2,053,000
Galaxy II Fund DESI ACTI DUB	Medium	Euro	4%	15.10.2060	364,000
Galaxy II Fund DESI ACTI DUB	Low	Euro	Available amounts after higher priority payment coverage	15.10.2060	3,329,849
Galaxy III Fund DESI ACT DUB	Single discount priority	Euro	Available amounts	15.10.2060	946,538
Galaxy IV Funding DAC DUB	High	Euro	0.75%	15.10.2060	670,000
Galaxy IV Funding DAC DUB	Medium	Euro	4%	15.10.2060	263,000
Galaxy IV Funding DAC DUB	Low	Euro	Available amounts after higher priority payment coverage	15.10.2060	2,172,197
Total					**11,722,272**

viii.Subordinated debt (Lower Tier II, Upper Tier II)

In the context of the Euro Medium Term Note Program of € 15 billion, the Bank issued on 13.2.2020 a subordinated debt at a nominal value of € 500 million for a period of ten years, with the option to recall in five years and with a fixed annual interest rate of 4.25%

Balance 1.1.2020	**651**
Changes for the year 1.1 - 31.12.2020	
New issues	495,363
Repurchases	(7,212)
Maturities / Repayments	(8)
Hedging adjustments	4,092
Financial (gains)/losses	(950)
Accrued interest	18,793
Balance 31.12.2020	**510,729**

The following table presents additional information for the above mentioned issuances:

a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	4.25%	13.2.2030	8,200	
Total				**8,200**	**-**

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+1.5%	Indefinite	650	650
Alpha Bank S.A.	Euro	4.25%	13.2.2030	491,800	
Total				**492,450**	**650**

Total of debt securities in issue and other borrowed funds as at 31.12.2020	**1,222,869**

The amounts are presented in thousands of Euro unless otherwise indicated

The following table presents the changes of debt securities and other borrowed funds by separately disclosing the cash and non-cash items:

Cash flows from financing activities	1.1.2020	Cash Flows	Non Cash Flows				
		Desecuritizations New issues Maturities Repayments	Accrued interest	Foreign exchange differences	Change of Fair Value	Other	31.12.2020
Senior debt securities	**1,369**	(43)	227				1,553
Liabilities from the securitization of shipping loans	**154,936**	(165,134)	2,493	7,705			-
Liabilities from the securitization of consumer loans	**220,090**	(222,010)	2,064			144	-
Subordinated loans	**651**	488,143	18,793			3,142	510,729
Liabilities from the securitization of other loans	**711,647**	(14,626)	13,634			(68)	710,587

Cash flows from financing activities	1.1.2019	Cash Flows	Non Cash Flows				
		Desecuritizations New issues Maturities Repayments	Accrued interest	Foreign exchange differences	Change of Fair Value	Other	31.12.2019
Senior debt securities	**6,179**	(5,087)	277				**1,369**
Liabilities from the securitization of shipping loans	**268,277**	(129,375)	10,622	5,412			**154,936**
Bonds originated from securitization of SME loans	**156,384**	(157,846)	1,462				**-**
Bonds originated from securitization of consumer loans	**-**	220,000	90				**220,090**
Subordinated loans	**651**	(8)	8				**651**
Liabilities from the securitization of other loans	**511,843**	183,111	16,130			563	**711,647**

The above cash flows are incuded in the net cash flows from financing activities in the cash flow statement of the year.

30. Liabilities for current income tax and other taxes

	31.12.2020	31.12.2019
Income tax	53,847	2,328
Other taxes	16,294	37,545
Total	**70,141**	**39,873**

192 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31. Employee defined benefit obligations

The total amounts recognized, in the financial statements for defined benefit obligations are presented in the tables below:

	Balance Sheet-Liabilities	
	31.12.2020	31.12.2019
Bank employee's indemnity provision due to retirement in accordance with Law 2112/1920	73,190	76,312
Savings program guarantee	2,761	2,703
Plans for Diners (pension and health care)	8,948	8,380
Greek Group companies' employees indemnity provision due to retirement in accordance with Law 2112/1920	9,127	3,206
Other provision for retirement benefits	360	331
Total Liabilities	**94,386**	**90,932**

	Income Statement Expenses /(Income) From 1 January to	
	31.12.2020	31.12.2019
Bank employee's indemnity provision due to retirement in accordance with Law 2112/1920	8,238	4,496
Savings program guarantee	(196)	217
Plans for Diners (pension and health care)	76	125
Greek Group companies' employees indemnity provision due to retirement in accordance with Law 2112/1920	888	384
Total	**9,006**	**5,222**

Balance Sheet and Income Statement amounts are analyzed per fund and type of benefit as follows:

i. Bank

a. Employee indemnity due to retirement in accordance with Law 2112/1920

The contracts of the regular employees of the Bank are indefinite term employee contracts and when terminated, the provisions of Law 2112/1920 and Law 3198/1955 apply, as amended by Law 4093/2012, which provide a lump sum benefit payment.

The amounts recognized in the balance sheet are as follows:

	31.12.2020	31.12.2019
Present value of defined obligations	73,190	76,312
Liability	**73,190**	**76,312**

The amounts recognized in the income statement are as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Current service cost	2,423	2,104
Net interest cost resulted from net asset/liability	646	1,240
Settlement/Curtailment/Termination (gain)/loss	5,094	(50)
Past service cost	75	1,363
Gain/(loss) from restructuring		(161)
Total (included in staff costs)	**8,238**	**4,496**

193 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The movement in the present value of defined obligation is as follows:

	2020	2019
Opening Balance	**76,312**	**73,611**
Current Service cost	2,423	2,104
Interest cost	646	1,240
Benefits paid	(8,182)	(11,014)
(Gain)/Loss from Settlement/Curtailment/Termination	5,094	(50)
(Gain)/loss from restructuring		(161)
Past service cost	75	1,363
Reclassification to voluntary separation scheme provision		(1,098)
Transfer of staff to CEPAL	(5,654)	
Actuarial (gain)/loss-financial assumptions	2,584	10,492
Actuarial (gain)/loss-experience assumptions	(108)	(175)
Closing Balance	**73,190**	**76,312**

The amounts recognized directly in equity during the year are analyzed as follows:

	31.12.2020	31.12.2019
Change in liability gain/(loss) due to changes in financial and demographic assumptions	(2,584)	(10,492)
Change in liability gain/(loss) due to experience adjustments	108	175
Total actuarial gain/(loss) recognized directly in Equity	**(2,476)**	**(10,317)**

The movement in the defined obligation liability is as follows:

	2020	2019
Opening balance	**76,312**	**73,611**
Benefits paid	(8,182)	(11,014)
Loss/(Gain) recognized in Income Statement	8,238	4,496
Loss/(Gain) recognized in equity	2,476	10,317
Reclassification to voluntary separation scheme provision		(1,098)
Transfer of staff to CEPAL	(5,654)	
Closing balance	**73,190**	**76,312**

The amount of € 5,654 in 2020 corresponds to the accrued liability relating to the Bank's personnel that was transferred to the Bank's NPL servicing subsidiary Cepal following the spin-off and transfer of non-performing loans business unit.

The amount of € 1,098 during the year 2019 corresponds to the provision made for employees who used the long-term leave under the voluntary exit scheme. For this population, an additional provision of € 9,805 was formed during the fiscal year 2019 to cover the entire provision of the program until their final separation.

b.Savings plan guarantee

For employees hired by the Bank and insured from 1.1.1993 until 31.12.2004 the Bank has guaranteed that the lump sum benefit payment, according to the provisions of the insurance plan, will be at least equal to the benefit as defined in Law 2084/1992 and the Cabinet Act 2/39350/0022/2.3.99.

The amounts included in the balance sheet are analyzed as follows:

	31.12.2020	31.12.2019
Present value of defined obligation	2,761	2,703
Liability	**2,761**	**2,703**

194 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The amounts included in the income statement are as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Current Service Cost	124	160
Net Interest cost resulted from net asset/liability	22	57
(Gain)/Loss from Settlement/Curtailment/Termination	(342)	
Total (Included in staff costs)	**(196)**	**217**

The movement in the present value of defined benefit obligation is as follows:

	2020	2019
Opening Balance	**2,703**	**3,325**
Current service cost	124	160
Interest cost	22	57
(Gain)/Loss from Settlement/Curtailment/Termination	(342)	
Actuarial (gain)/loss-financial assumptions	(58)	1,203
Actuarial (gain)/loss-experience adjustments	312	(2,042)
Closing Balance	**2,761**	**2,703**

The amounts recognized directly in Equity during the year are analyzed as follows:

	31.12.2020	31.12.2019
Change in liability due to changes in financial and demographic assumptions - gain/(loss)	58	(1,203)
Change in liability due to experience adjustments - gain/(loss)	(312)	2,042
Total actuarial gain/(loss) recognized in equity	**(254)**	**839**

The movement in the obligation is as follows:

	2020	2019
Opening Balance	**2,703**	**3,325**
Loss/(gain) recognized in income statement	(196)	217
Loss/(gain) recognized in equity	254	(839)
Closing Balance	**2,761**	**2,703**

c. Supplementary Pension Fund and Healthcare of Diners

The Bank guarantees from 30.9.2014, date of acquisition of Diners Club Greece A.E., the Supplementary Pension Fund and Health Care Plan of the Company, which is managed by an independent insurance company.

On 2.6.2015, the merger through absorption of the company was completed. These plans cover the pensioners and those who have retired and have the right to receive supplementary pension in the future.

The amounts included in the balance sheet are analyzed as follows:

	31.12.2020	31.12.2019
Present value of defined obligation	10,943	10,726
Fair value of plan assets	(1,995)	(2,346)
Liability	**8,948**	**8,380**

The assets of the scheme includes only cash.

195 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The amounts included in the income statement are analyzed as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Net interest cost resulted from the net asset/liability	69	117
Expenses	7	8
Total (included in staff costs)	**76**	**125**

The movement in the present value of defined benefit obligation is as follows:

	2020	2019
Opening Balance	**10,726**	**9,528**
Interest Cost	86	161
Benefits paid directly by the Bank	(20)	(9)
Benefits paid by the Plan	(343)	(363)
Actuarial (gain)/loss-financial assumptions	414	1,391
Actuarial (gain)/loss-experience adjustments	80	18
Closing balance	**10,943**	**10,726**

The movement in the fair value of plan assets is as follows:

	2020	2019
Opening Balance	**2,346**	**2,717**
Expected return	17	44
Benefits paid	(343)	(363)
Expenses	(7)	(8)
Actuarial losses	(18)	(44)
Closing Balance	**1,995**	**2,346**

The amounts recognized directly in Equity during the year are analyzed as follows:

	31.12.2020	31.12.2019
Change in liability due to financial and demographic assumptions - gains/(loss)	(414)	(1,391)
Change in liability due to experience adjustments - gain/(loss)	(80)	(18)
Return on plan assets excluding amounts included in income statement - gain/(loss)	(18)	(44)
Total actuarial gain/(loss) recognized in equity	**(512)**	**(1,453)**

The movement in the obligation/(asset) is as follows:

	2020	2019
Opening Balance	**8,380**	**6,811**
Benefits paid directly by the Bank	(20)	(9)
(Gain)/loss recognized in Income Statement	76	125
(Gain)/loss recognized in Equity	512	1,453
Closing Balance	**8,948**	**8,380**

The results of the abovementioned valuations are based on the assumptions of the actuarial studies.

The principal actuarial assumptions used for the above mentioned defined benefit plans are as follows:

	31.12.2020	31.12.2019
Discount rate	0.44%-0.58%	0.82%
Inflation rate	1.30%	1.30%
Return on plan assets	1.50%	1.50%
Future salary growth	1.70%	1.80%
Future pension growth	0.00%	0.00%

196 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The discount rate was based on the iBoxx Euro Corporate AA+ adjusted to the characteristics of the programs.

The average duration per program is depicted in the table below:

	31.12.2020	31.12.2019
Bank employee's indemnity provision due to retirement in accordance with Law 2112/1920	16.6	17.3
Saving program guarantee	16.4	17.2
Plans for Diners (pension and health care)	15.9	16.1

The table below presents the sensitivity analysis of the financial assumptions in regards to the obligation of the above programs:

	Percentage variation in liability (%
Increase in discount rate by 0.5%	(7.7)
Decrease in discount rate by 0.5%	8.5
Increase in future salary growth rate by 0.5%	8.4
Decrease in future salary growth rate by 0.5%	(7.5)

ii. Group companies

The employees of Greek subsidiaries with employment contracts of indefinite duration, receive a lump sum payment on retirement, as defined by Law 2112/1920 as modified by Law 4093/2012.

These companies include Cepal, in which 519 employees from the Group were transferred with recognition of their previous service, of which 504 from the Bank. The total amounts recognized in the financial statements regarding the defined benefit obligations of the Group are analyzed as follows:

	Balance Sheet – Liabilities	
	31.12.2020	31.12.2019
Indemnity of employees of greek subsidiaries due to retirement in accordance with Law 2112/1920	9,127	3,206
Other provision for retirement benefits	360	331
Total Liabilities	**9,487**	**3,537**

	Income Statement Expenses From 1 January to	
	31.12.2020	31.12.2019
Indemnity of employees of greek subsidiaries due to retirement in accordance with Law 2112/1920	888	384
Total	**888**	**384**

The amount of actuarial gain/losses that was recognized in equity for the defined benefit plans of the Group companies' amounts to € 428 loss for 2020 against € 394 loss for 2019.

For all the mentioned above plans, no contributions are expected to be paid during 2021.

32. Other liabilities

	31.12.2020	31.12.2019
Liabilities to third parties	52,989	92,507
Brokerage services	21,537	15,990
Deferred income	8,281	7,959
Accrued expenses	93,004	78,970
Liabilities to merchants for the use of credit cards	264,696	323,451
Leases liabilities	164,638	205,199
Other	286,435	333,768
Total	**891,580**	**1,057,844**

197 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Lease liabilities mainly relates to buildings used by the Bank for its branches and other business units, offsite ATMs and executives' leased cars.

The duration of the lease agreement in new branches is set at three years with the possibility of unilateral extension by the Bank for an additional period, taking into account current conditions at that respective period. The extensions are performed with the same terms as with the initial leases, retaining the right to terminate the contract at any time within the agreed period. The Bank's policy is to renew these contracts, if needed.

In the case of renewals of existing leases, the new lease is set at three years with the possibility of an unilateral extension by the Bank for an additional period, which decides whether to exercise in accordance with current conditions at that respective period. The extensions performed is with the same terms as of the initial lease, retaining the right to terminate the contract at any time within the agreed period. The Bank's policy is to renew these contracts, if needed.

In particular, in the case of branch Leases, which the Bank decided that the lease should be extended, the term of the lease is set at one or two years on the basis of the relevant extension right.

Finally, for leases of Off-site ATMs, for the majority of them, the lease duration is set at one or two years and if extended, since contractually the extension transpose them to indefinite, the duration of the lease is estimated for ten years.

As part of the transition to the IFRS 16 standard, the Bank recognized on 1.1.2019 the right of use of assets and the lease liabilities for all leases falling within the scope of IFRS 16. Lease liabilities were discounted using the incremental borrowing rate of 1.1.2019. The average weighted discount rate was 2.71%.

In particular, on 1.1.2019 the Group recognised right-of-use of assets amounting of € 179.8 million, out of which € 157.9 million was classified as own used assets and an amount of € 10.3 million under investment property, amount of € 11.6 million under assets held for sale, receivables from finance leases of € 10.5 million and liabilities from leases amount of € 245.2 million (notes 19,22,23).

Within the context of IFRS 16 implementation, the following estimations were made:

(a) for contract renewals on the basis of extension rights; and

(b) for cases of indefinite life contracts, estimates for the determination of the duration that the Bank expects to make use of the lease.

It is noted that there are no property leases which include a variable lease term while variable leases have been included in the expenses relating to other types of leases.

In addition, there are no lease agreements signed in the last days of the year 2020 that have been in effect since 1.1.2021 and there are no cases where the Group has sold and subleased a property owned.

The following table presents the changes of lease liabilities as a result of the implementation of IFRS 16, by disclosing separately the cash flows, which are included in cash flows from financing activities as depicted in the cash flow statement, and the non-cash flows. As a result of the implementation of IFRS 16, the Group recognized lease liabilities amounted to € 205,199 on 31.12.2019 and € 164,638 on 31.12.2020.

Cash flows from financing activities	**1.1.2020**	**Cash flows**	**Non-cash flows**		**31.12.2020**
			New leases	**Other changes**	
Lease liabilities	**205,199**	(42,765)	8,244	(6,040)	**164,638**

Cash flows from financing activities	**1.1.2019**	**Cash flows**	**Non-cash flows**		**31.12.2019**
			New leases	**Other changes**	
Lease liabilities	**233,524**	(39,746)	15,936	(4,515)	**205,199**

In addition to the above Liabilities, an amount of € 11,649 recognized on 1.1.2019 concerned the company of Alpha Investment Property Group I S.A. which was classified as assets for sale on 31.12.2018, the sale of which was completed during the year.

Group's policy on leases is detailed described in notes 1.2.11.

198 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

33. Provisions

	31.12.2020	31.12.2019
Insurance	522,768	405,412
Provisions to cover credit risk and other provisions	180,862	194,129
Total	**703,630**	**599,541**

a. Insurance

	31.12.2020	31.12.2019
Life insurance		
Mathematical reserves	517,559	404,960
Outstanding claim reserves	5,209	452
Total	**522,768**	**405,412**

The movement of insurance provisions is listed in the table below:

Balance 1.1.2019	**313.685**
Changes for the year 1.1 - 31.12.2019	
New provisions and increase of current provisions	99.651
Provisons utilized	(7.924)
Balance 31.12.2019	**405.412**
Changes for the year 1.1 - 31.12.2020	
New provisions and increase of current provisions	137.364
Provisions used	(20.008)
Balance 31.12.2020	**522.768**

b. Provisions to cover credit risk and other provisions

Balance 1.1.2019	**213,701**
Changes for the year 1.1-31.12.2019	
Provisions to cover credit risk relating to letters of guarantee, letters of credit and undrawn loan commitments (note 11)	1,251
Other provisions	20,439
Other provisions used	(8,110)
Provision for separation schemes	92,531
Reclassification from employee's staff termination indemnity in accordance with Law 2112/1920 in voluntary separation scheme provision which is related to those who have retired using the long-term paid leave	1,098
Use of provision for separation schemes	(83,262)
Reversal of provision for separation scheme	(42,916)
Foreign exchange differences	(603)
Balance 31.12.2019	**194,129**
Changes for the year 1.1-31.12.2020	
Provisions to cover credit risk relating to letters of guarantee, letters of credit and undrawn loan commitments (note 11)	(741)
Other provisions	11,086
Other provisions used	(9,331)
Used of provision for separation schemes	(12,509)
Foreign exchange differences	(1,773)
Balance 31.12.2020	**180,862**

The amounts of other provisions are included in "Other Expenses" (note 10), the amounts of provisions to cover credit risk relating to financial guarantee contracts are included in "Impairment losses and provisions for credit risk" (note 11), and the amounts for provisions of staff separation schemes are included in "Staff costs and expenses for separation schemes" (note 8).

199 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

On 31.12.2020 the balance of provisions to cover credit risk relating to Letters of Guarantee, Letters of Credit and undrawn loan commitments amounts to € 91,482 (31.12.2019: € 93,440) of which an amount of € 6,127 (31.12.2019: € 5,695) relates to provisions for undrawn loan commitments and an amount of € 85,355 (31.12.2019: € 87,745) relates to provisions for Letters of Guarantee and Letters of Credit.

The balance of the provision for the separation schemes as at 31.12.2020 amounts to € 15,112 (31.12.2019 € 26,456) which relates to an amount of € 12,937 (31.12.2019: € 24,419) to cover the cost of employees who departed using the long term leave in the context of the exit programs that was in force for the period 2016 and onwards and to an amount of € 2,175 (31.12.2019: € 2,037) for the senior executives' indemnity program as described in note 8.

On 31.12.2020 the balance of other provisions amounts to € 74,628 (31.12.2019: € 74,234) out of which:

- An amount of € 31,548 (31.12.2019: € 26,199) relates to pending legal cases,
- An amount of € 11,172 (31.12.2019: € 17,522) relates to the Bank's assessment for the year ended 31.12.2020, for the dismissal of the appeals submitted in previous years regarding the obligation to make contributions to an insurance fund.
- The remaining balance of other provisions relate mainly to other provisions for operational loss events.

EQUITY

34. Share capital

The Bank's share capital on 31.12.2020 and 31.12.2019 amounts to € 463,110 divided into 1,543,699,381 ordinary registered shares with voting rights with a nominal value of € 0.30 each.

In the context of Stock Options Plan for the granting of stock options to key management personnel of the Bank and its connected entities, as further described in note 8, within January 2021 2,281,716 options rights vested and exercised from the beneficiaries, in accordance with Performance Incentive Program for the fiscal years of 2018 and 2019. As a result of the above, 2,281,716 ordinary, registered, voting shares with nominal value of Euro 0.30 were issued in 2021 and the Share Capital of the Bank increased by € 685.

35. Share premium

Share premium at 31.12.2020 and 31.12.2019 amounted to € 10,801,029.

Considering the share capital increase described above from the exercise of the options rights of the Banks' shares, the reserves from the share premium was increased by € 1,483 resulting from the valuation at fair value, on the date of awarding to the employees the option rights, which were exercised from the Beneficiaries during the exercise period.

36. Reserves

Reserves are analyzed as follows:

a. Statutory reserve

	31.12.2020	31.12.2019
Statutory reserve	540,893	538,820

According to article 158 of Law 4548/2018 (the relevant clause included in the article 26 of the Bank's Article Association, as in force), one-twentieth (1/20) of the net profit of the year is deducted annually from each year's net profit for the formation of the statutory reserve. The deduction for the formation of the statutory reserve ceases to be mandatory when the reserve amounts one-third (1/3) of the share capital. Based on the provisions of the aforementioned article, this reserve can be used only before any distribution in order to to offset any debit balance of in "Retained earnings".

For the remaining companies of the Group the statutory reserve is established according to local regulations.

b. Reserves of investment securities measured at fair value through other comprehensive income

	2020	2019
Opening Balance 1.1	**487,531**	**114,137**
Changes for the year 1.1 - 31.12		
Valuation of debt securities measured at fair value through other comprehensive income, after income tax	25,875	597,316
Reclassification to income statement of reserve of debt securities measured at fair value through other comprehensive income, after income tax	(285,283)	(223,922)
Total	**(259,408)**	**373,394**
Balance 31.12	**228,123**	**487,531**

The movements for the year 2020 of the reserve for investment securities measured at fair value through other comprehensive income that relate to the revaluation of the investment securities and the transfer of the related reserve to Income Statement, amounts (before income tax) to a credit amount of € 37,818 and a debit amount of € 401,764 (1.1 – 31.12.2019 debit amounts € 839,308 and € € 315,379 respectively).

201 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

c. Cash flow hedge reserve recognised directly in Equity

	2020	2019
Opening Balance 1.1	(238,467)	**(145,838)**
Changes for the year 1.1 - 31.12		
Change in cash flow hedge reserve after income tax	14,797	(92,629)
Balance 31.12	(223,670)	**(238,467)**

d. Exchange differences on translating and hedging the net investment in foreign operations

	2020	2019
Opening Balance 1.1	(48,019)	**(44,455)**
Changes for the year 1.1 - 31.12		
Change of Foreign Exchange differences on translating and hedging the net investment in foreign operations	(5,892)	(3,564)
Balance 31.12	(53,911)	**(48,019)**

e. Share of other comprehensive income of associates and joint ventures

	2020	2019
Balance 1.1	(189)	**(189)**
Changes for the year 1.1 - 31.12		
Change in the share of other comprehensive income of associates and joint ventures	(122)	
Balance 31.12	(311)	**(189)**

f. Reserves related to Assets held for sale

	2020	2019
Balance 1.1	(122)	**(122)**
Changes for the year 1.1 - 31.12		
Change in the share of other comprehensive income of associates and joint ventures	122	
Balance 31.12	-	**(122)**

g. Reserve valuation for stock options rights to employees

	2020	2019
Opening balance 1.1	-	**-**
Changes for the year 1.1 - 31.12		
Reserve valuation for stock options right to employees	1,667	
Balance 31.12	1,667	**-**

At 31.12.2020, in the context of the Stock Options Plan and the stock options granted to key management personnel of the Bank and its connected entities, as detailed described in note 8, a reserve was recognized amounting to € 1,667 from the valuation of the abovementioned options.

Total reserves (a+b+c+d+e+f+g)	492,791	**739,676**

202 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

37. Retained earnings

a. Since in 2019 there were no distributable profits, in accordance with article 159 of Law 4548 / 2018, the Ordinary General Assembly Meeting of Shareholders held on 31.7.2020 decided to non distribute of dividends to the ordinary shareholders of the Bank.

b. Pursuant to article 159 of Law 4548 / 2018 and due to the fact that there are no distributable profits for the year 2020, the Board of Directors of the Bank will propose to the Ordinary General Assembly Meeting of Shareholders the nondistribution of dividends to the shareholders of the Bank.

38. Hybrid securities

	31.12.2020	31.12.2019
Perpetual with 1st call option on 18.2.2015 and per year	15,232	15,232
Securities held by Group companies	(533)	(160)
Total	**14,699**	**15,072**

203 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ADDITIONAL INFORMATION

39. Contingent liabilities and commitments

a. Legal issues

There are certain legal claims against the Group, in the ordinary course of business. In the context of managing the operational risk events and based on the applied accounting policies, the Group has established internal controls and processes to monitor all legal claims and similar actions by third parties in order to assess the probability of a negative outcome and the potential loss.

For cases where there is a significant probability of a negative outcome, and the result may be reliably estimated, the Bank recognizes a provision that is included in the Balance Sheet under the caption “Provisions”. On 31.12.2020 the amount of the provision stood at € 31,548 (31.12.2019: € 26,199).

For those cases, that according to their progress and the assessment of the legal department as at December 31, 2020, a negative outcome is not probable or the potential outflow cannot be estimated reliably due to the complexity of the cases, and their duration, the Bank has not recognized a provision. As of 31.12.2020 the legal claims against the Bank for the above cases amount to 275,509 (31.12.2019: € 338,920).

According to the legal department’s estimation, the ultimate settlement of the claims and lawsuits is not expected to have a material effect on the financial position or the operations of the Group.

b. Tax issues

The Bank has been audited by the tax authorities for the years up to and including 2010. Years 2011, 2012 and 2013 are considered as closed, in accordance with the Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority. On 13.07.2020 a regular audit order was issued for the year 2014, which was completed in December 2020. For the years 2011 up to 2019, the Bank has obtained a tax certificate with no qualifications according to the article 82 of Law 2238/1994 and the article 65A of Law 4174/2013. The tax audit for the tax certificate of 2020 is in progress. Emporiki Bank has been audited by the tax authorities for the years up to and including 2008. Years 2009-2013 are considered as closed, in accordance with the Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority. For the years 2011 up to 2013 Emporiki Bank has obtained a tax certificate with no qualifications.

The Bank’s branch in London has been audited by the tax authorities up to and including 2016.

The Bank’s branch in Luxemburg started its operation on June 2020.

On 2.6.2015, the merger by absorption of Diners Club of Greece A.E.P.P. was completed. Diners Club of Greece A.E.P.P. has been audited by the tax authorities for the years up to and including 2010. Years 2011, 2012 and 2013 are considered as closed, in accordance with the Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority. For the years 2011 up to 2013 Diners Club of Greece A.E.P.P. has obtained a tax certificate with no qualifications.

Based on Ministerial Decision 1006/5.1.2016 there is no exemption from tax audit by the tax authorities to those entities that have been tax audited by the independent auditor and they have received an unqualified tax audit certificate. Therefore, the tax authorities may reaudit the tax books for previous years.

Additional taxes, interest on late submission and penalties may be imposed by tax authorities, as a result of tax audits for unaudited tax years, the amount of which cannot be accurately determined.

The Group's subsidiaries have been audited by the tax authorities up to and including the year indicated in the table below:

Name	Year
Banks	
1. Alpha Bank London Ltd (voluntary settlement of tax obligation)	2018
2. Alpha Bank Cyprus Ltd	2017
3. Alpha Bank Romania S.A. (tax audit is in progress for the years 2014 - 2019)	2006
4. Alpha Bank Albania SH.A. (tax audit completed for the year 2019)	2015
Leasing Companies	
1. Alpha Leasing A.E.**	2014
2. Alpha Leasing Romania IFN S.A.	2014
3. ABC Factors A.E.**	2014
4. Cepal Hellas Holdings A.E.	*
Investment Banking	
1. Alpha Finance A.E.P.E.Y. ** / ***	2014
2. SSIF Alpha Finance Romania S.A.	2002
3. Alpha Ventures A.E. ** / ***	2014
4. Alpha A.E. Ventures Capital Management - AKES ** / ***	2014
5. Emporiki Venture Capital Developed Markets Ltd	2017
6. Emporiki Venture Capital Emerging Markets Ltd	2011
Asset Management	
1. Alpha Asset Management A.E.D.A.K.** / ***	2014
2. ABL Independent Financial Advisers Ltd (voluntary settlement of tax obligation)	2018
Insurance	
1. Alpha Insurance Agents A.E.** / ***	2014
2. Alpha Insurance Brokers Srl	2006
3. Alphalife A.A.E.Z.** / *** (tax audit for the years 2015 - 2016 is completed)	2014
Real Estate and Hotel	
1. Alpha Astika Akinita A.E.**	2014
2. Alpha Real Estate Management and Investments S.A. (former Ionian Holdings)	2014
3. Alpha Real Estate Bulgaria E.O.O.D. (commencement of operation 2007)	*
4. Chardash Trading E.O.O.D. (commencement of operation 2006)	*
5. Alpha Real Estate Services Srl (commencement of operation 1998)	*
6. Alpha Investment Property Attikis A.E. (commencement of operation 2012)**	2014
7. Alpha Investment Property Attikis II A.E. (commencement of operation 2012)**	2014
8. AGI-RRE Participations 1 Srl (commencement of operation 2010)	*
9. Stockfort Ltd (commencrment of operation 2010)	2011
10. Romfelt Real Estate S.A.	2015
11. AGI-RRE Zeus Srl (commencement of operation 2012)	*
12. AGI-RRE Poseidon Srl (commencement of operation 2012)	*
13. AGI-RRE Hera Srl (commencement of operation 2012)	*
14. Alpha Real Estate Services LLC (commencement of operation 2010)	2011
15. AGI-BRE Participations 2 E.O.O.D. (commencement of operation 2012)	*
16. AGI-BRE Participations 2BG E.O.O.D. (commencement of operation 2012)	*
17. AGI-BRE Participations 3 E.O.O.D. (commencement of operation 2012-the company was transferred on 30.6.2020)	*
18. AGI-BRE Participations 4 E.O.O.D. (commencement of operation 2012) (tax audit is in progress for the years 2018-2019)	*
19. APE Fixed Assets A.E.** / ***	2014
20. SC Cordia Residence Srl (disolved on 11.6.2020)	2013
21. AGI-RRE Cleopatra Srl (commencement of operation 2014)	*
22. SC Carmel Residential Srl (commencement of operation 2013)	*

* These companies have not been audited by the tax authorities since the commencement of their operations.

** These companies received tax certificate for the years 2011 up to and including 2019 without any qualification whereas the years up to and including 2014 are considered as closed in accordance with the circular POL.1208/20.12.2017 (note 8).

*** These companies have been audited by the tax authorities up to and including 2009 in accordance with Law 3888/2010 which relates to voluntary settlement for the unaudited tax years.

205 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Name	Year
23. Alpha Investment Property Neas Kifisias A.E. (commencement of operation 2014)	*
24. Alpha Investment Property Kalirois A.E. (commencement of operation 2014)	*
25. AGI-Cypre Alaminos Ltd (commencement of operation 2014)	*
26. AGI-Cypre Tochni Ltd (commencement of operation 2014)	*
27. AGI-Cypre Mazotos Ltd (commencement of operation 2014)	*
28. Alpha Investment Property Livadias A.E. (commencement of operation 2014)	*
29. Asmita Gardens Srl	2015
30. Alpha Investment Property Kefalariou A.E. (commencement of operation 2015)	*
31. Cubic Center Development S.A. (commencement of operation 2010)	2015
32. Alpha Investment Property Neas Erythreas A.E. (commencement of operation 2015)	*
33. AGI-SRE Participations 1 DOO (commencement of operation 2016)	*
34. Alpha Investment Property Spaton A.E. (commencement of operation 2017)	*
35. TH Top Hotels Srl(commencement of operation 2009)	*
36. Alpha Investment Property Kallitheas A.E. (commencement of operation 2017)	*
37. Kestrel Enterprise E.O.O.D. (commencement of operation 2013)	*****
38. Beroe Real Estate E.O.O.D. (commencement of operation 2018 – company was dissolved on 11.12.2020)	*
39. Alpha Investment Property Irakleiou A.E (commencement of operation 2018)	*
40. Alpha Investment Property GI I A.E (commencement of operation 2018 – company was sold on 24.12.2020)	*
41. AGI-Cypre Property 2 Ltd (commencement of operation 2018)	*
42. AGI-Cypre Property 3 Ltd (commencement of operation 2018)	*
43. AGI-Cypre Property 4 Ltd (commencement of operation 2018)	*
44. AGI-Cypre Property 5 Ltd (commencement of operation 2018)	*
45. AGI-Cypre Property 6 Ltd (commencement of operation 2018)	*
46. AGI-Cypre Property 7 Ltd (commencement of operation 2018)	*
47. AGI-Cypre Property 8 Ltd (commencement of operation 2018)	*
48. ABC RE L1 Ltd (commencement of operation 2018 – company was transferred on 5.8.2020)	*
49. AGI-Cypre Property 9 Ltd (commencement of operation 2018)	*
50. AGI-Cypre Property 10 Ltd (commencement of operation 2018)	*
51. AGI-Cypre Property 11 Ltd (commencement of operation 2018)	*
52. AGI-Cypre Property 12 Ltd (commencement of operation 2018)	*
53. AGI-Cypre Property 13 Ltd (commencement of operation 2018)	*
54. AGI-Cypre Property 14 Ltd (commencement of operation 2018)	*
55. AGI-Cypre Property 15 Ltd (commencement of operation 2018)	*
56. AGI-Cypre Property 16 Ltd (commencement of operation 2018)	*
57. AGI-Cypre Property 17 Ltd (commencement of operation 2018)	*
58. AGI-Cypre Property 18 Ltd (commencement of operation 2018)	*
59. AGI-Cypre Property 19 Ltd (commencement of operation 2018)	*
60. AGI-Cypre Property 20 Ltd (commencement of operation 2018)	*
61. AGI-Cypre RES Pafos Ltd (commencement of operation 2018)	*
62. AGI-Cypre P&F Nicosia Ltd (commencement of operation 2018)	*
63. ABC RE P1 Ltd (commencement of operation 2018)	*
64. ABC RE P2 Ltd (commencement of operation 2018)	*
65. ABC RE P3 Ltd (commencement of operation 2018)	*
66. ABC RE L2 Ltd (commencement of operation 2018)	*
67. ABC RE P4 Ltd (commencement of operation 2018)	*
68. AGI-Cypre RES Nicosia Ltd (commencement of operation 2018)	*
69. AGI-Cypre P&F Limassol Ltd (commencement of operation 2018)	*
70. AGI-Cypre Property 21 Ltd (commencement of operation 2018)	*
71. AGI-Cypre Property 22 Ltd (commencement of operation 2018)	*
72. AGI-Cypre Property 23 Ltd (commencement of operation 2018)	*
73. AGI-Cypre Property 24 Ltd (commencement of operation 2018)	*

* These companies have not been audited by the tax authorities since the commencement of their operations.

***** These companies entered the Group in 2017 through bankruptcy and have not been audited by the tax authorities since.

206 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Name	Year
74. ABC RE L3 Ltd (commencement of operation 2018)	*
75. ABC RE P&F Limassol Ltd (commencement of operation 2018)	*
76. AGI-Cypre Property 25 Ltd (commencement of operation 2019)	*
77. AGI-Cypre Property 26 Ltd (commencement of operation 2019)	*
78. ABC RE COM Pafos Ltd (commencement of operation 2019)	*
79. ABC RE RES Larnaca Ltd (commencement of operation 2019)	*
80. AGI-Cypre P&F Pafos Ltd (commencement of operation 2019)	*
81. AGI-Cypre Property 27 Ltd (commencement of operation 2019)	*
82. ABC RE L4 Ltd (commencement of operation 2019)	*
83. ABC RE L5 Ltd (commencement of operation 2019)	*
84. AGI-Cypre Property 28 Ltd (commencement of operation 2019)	*
85. AGI-Cypre Property 29 Ltd (commencement of operation 2019)	*
86. AGI-Cypre Property 30 Ltd (commencement of operation 2019)	*
87. AGI-Cypre COM Pafos Ltd (commencement of operation 2019)	*
88. AIP Industrial Properties M.A.E. (commencement of operation 2019)	*
89. AGI-Cypre Property 31 Ltd (commencement of operation 2019)	*
90. AGI-Cypre Property 32 Ltd (commencement of operation 2019)	*
91. AGI-Cypre Property 33 Ltd (commencement of operation 2019)	*
92. AGI-Cypre Property 34 Ltd (commencement of operation 2019)	*
93. Alpha Group Real Estate Ltd (commencement of operation 2019)	*
94. ABC RE P&F Pafos Ltd (commencement of operation 2019)	*
95. ABC RE P&F Nicosia Ltd (commencement of operation 2019)	*
96. ABC RE RES Nicosia Ltd (commencement of operation 2019)	*
97. Fierton Ltd (commencement of operation 2019)	*
98. AIP residential Assets Rog S.M.S.A. (commencement of operation 2019)	*
99. AIP Attica Residential Assets I S.M.S.A. (commencement of operation 2019)	*
100. AIP Thessaloniki Residential Assets S.M.S.A. (commencement of operation 2019)	*
101. AIP Cretan Residential Assets S.M.S.A. (commencement of operation 2019)	*
102. AIP Aegean Residential Assets S.M.S.A. (commencement of operation 2019)	*
103. AIP Ionian Residential Assets S.M.S.A. (commencement of operation 2019)	*
104. AIP Urban Cetres Commercial Assets S.M.S.A. (commencement of operation 2019)	*
105. AIP Thessaloniki Commercial Assets S.M.S.A. (commencement of operation 2019)	*
106. AIP Commercial Assets Rog S.M.S.A. (commencement of operation 2019)	*
107. AIP Attica Retail Assets I S.M.S.A. (commencement of operation 2019)	*
108. AIP Attica Retail Assets II S.M.S.A. (commencement of operation 2019)	*
109. AIP Attica Residential Assets II S.M.S.A. (commencement of operation 2019)	*
110. AIP Retail Assets Rog S.M.S.A. (commencement of operation 2019)	*
111. AIP Land II S.M.S.A. (commencement of operation 2019)	*
112. ABC RE P6 Ltd (commencement of opearation 2019)	*
113. AGI-Cypre Property 35 Ltd commencement of opearation 2019)	*
114. AGI-Cypre P&F Larnaca Ltd (commencement of opearation 2019)	*
115. AGI-Cypre Property 37 Ltd (commencement of opearation 2019)	*
116. AGI-Cypre RES Ammochostos Ltd (commencement of operation 2019)	*
117. AGI-Cypre Property 36 Ltd (commencement of operation 2019)	*
118. AGI-Cypre Property 38 Ltd (commencement of operation 2019)	*
119. AGI-Cypre RES Larnaca Ltd (commencement of operation 2019)	*
120. ABC RE P7 Ltd (commencement of operation 2019)	*
121. AGI-Cypre Property 42 Ltd (commencement of operation 2019)	*
122. ABC RE P&F Larnaca Ltd (commencement of operation 2019)	*
123. Krigeo Holdings Ltd (commencement of operation 2019)	*
124. AGI-Cypre Property 43 Ltd (commencement of operation 2019)	*

* These companies have not been audited by the tax authorities since the commencement of their operations.

207 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Name	Year
125. AGI-Cypre Property 44 Ltd (commencement of operation 2019)	*
126. AGI-Cypre Property 40 Ltd (commencement of operation 2020)	*
127. ABC RE RES Ammochostos Ltd (commencement of operation 2020)	*
128. ABC RE RES Paphos Ltd (commencement of operation 2020)	*
129. Sapava Ltd (commencement of operation 2020)	*
130. AGI-Cypre Property 46 Ltd (commencement of operation 2020)	*
131. AGI-Cypre Proprety 47 Ltd (commencement of operation 2020)	*
132. AGI-Cypre Proprety 48 Ltd (commencement of operation 2020)	*
133. Alpha Credit Property 1 Ltd (commencement of operation 2020)	*
134. Office Park 1 Srl (commencement of operation 2020)	*
135. Acarta Construct Srl	2014
136. AGI-Cypre Property 45 Ltd (commencement of operation 2020)	*
137. AGI-Cypre COM Nicosia Ltd (commencement of operation 2020)	*
138. AGI-Cypre Property 49 Ltd (commencement of operation 2020)	*
139. AGI-Cypre Property 50 Ltd (commencement of operation 2020)	*
140. AGI-Cypre COM Larnaca Ltd (commencement of operation 2020)	*
141. Reoco Orion X M.A.E. (commencement of operation 2020)	*
142. Reoco Galaxy II M.A.E. (commencement of operation 2020)	*
143. Reoco Galaxy IV M.A.E. (commencement of operation 2020)	*
Special Purpose and Holdings Entities	
1. Alpha Credit Group Plc (voluntary settlement of tax obligation)	2018
2. Alpha Group Jersey Ltd	****
3. Alpha Group Investments Ltd (commencement of operation 2006)	2017
4. Ionian Equity Participations Ltd (commencement of operation 2006)	2011
5. AGI-BRE Participations 1 Ltd (commencement of operation 2009)	*
6. AGI-RRE Participations 1 Ltd (commencement of operation 2009)	*
7. Alpha Group Ltd (commencement of operation 2012)	2017
8. Katanalotika Plc (voluntary settlement of tax obligation)	2018
9. Epihiro Plc (voluntary settlement of tax obligation)	2018
10. Irida Plc (voluntary settlement of tax obligation)	2018
11. Pisti 2010 - 1 Plc (voluntary settlement of tax obligation)	2018
12. Alpha Shipping Finance Ltd (voluntary settlement of tax obligation)	2018
13. Alpha Proodos DAC (commencement of operation 2016)	*
14. Alpha Quantum DAC (commencement of operation 2019)	*
15. AGI-RRE Athena Ltd (commencement of operation 2011)	2011
16. AGI-RRE Poseidon Ltd (commencement of operation 2012)	*
17. AGI-RRE Hera Ltd (commencement of operation 2012)	*
18. Umera Ltd (commencement of operation 2012)	2017
19. AGI-BRE Participations 2 Ltd (commencement of operation 2011)	2011
20. AGI-BRE Participations 3 Ltd (commencement of operation 2011)	2011
21. AGI-BRE Participations 4 Ltd (commencement of operation 2010)	2011
22. AGI-RRE Ares Ltd (commencement of operation 2010)	2011
23. AGI-RRE Venus Ltd (commencement of operation 2012)	*
24. AGI-RRE Artemis Ltd (commencement of operation 2012)	*
25. AGI-BRE Participations 5 Ltd (commencement of operation 2012)	*
26. AGI-RRE Cleopatra Ltd (commencement of operation 2013)	*
27. AGI-RRE Hermes Ltd (commencement of operation 2013)	*
28. AGI-RRE Arsinoe Ltd (commencement of operation 2013)	*
29. AGI-SRE Ariadni Ltd (commencement of operation 2013)	*
30. Zerelda Ltd (commencement of operation 2012)	*
31. AGI-Cypre Evagoras Ltd (commencement of operation 2014)	*
32. AGI-Cypre Tersefanou Ltd (commencement of operation 2014)	*

* These companies have not been audited by the tax authorities since the commencement of their operations.

**** These companies are not subject to a tax audit.

208 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Name	Year
33. AGI-Cypre Ermis Ltd (commencement of operation 2014)	*
34. AGI-SRE Participations 1 Ltd (commencement of operation 2016)	*
35. Alpha Credit Acquisition Company Ltd (commencement of operation 2019)	*
36. Alpha International Holding Company S.A. (commencement of operation 2019)	*
37. Orion X Securitisation D.A.C. (commencement of operation 2020)	*
38. Galaxy II Funding D.A.C. (commencement of operation 2020)	*
39. Galaxy III Funding D.A.C. (commencement of operation 2020)	*
40. Galaxy IV Funding D.A.C. (commencement of operation 2020)	*
41. Alpha International Holdings M.A.E. (commencement of operation 2020)	*
42. Alpha Holdings M.A.E. (former Emporiki Development and Real Estate Management)	2014
Other Companies	
1. Alpha Bank London Nominees Ltd	****
2. Alpha Trustees Ltd (commencement of operation 2002)	2011
3. Kafe Alpha A.E.** / ***	2014
4. Alpha Supporting Services A.E.** / ***	2014
5. Real Car Rental A.E.** / ***	2014
6. Emporiki Management A.E. ***	2014
7. Alpha Bank Notification Services A.E. (commencement of operation 2015)	*

c. Off balance sheet commitments

The Group as part of its normal operations, make contractual commitments, that in the future may result in changes in its asset structure. These commitments are monitored in off balance sheet accounts and relate to letters of credit, letters of guarantee and liabilities from undrawn loan commitments as well as guarantees given for bonds issued and other guarantees to subsidiary companies.

Letters of credit are used to facilitate trading activities and relate to the financing of contractual agreements for the transfer of goods locally or abroad, through direct payment to the third party on behalf of the Group's customers. Letters of credit, as well as letters of guarantee, are commitments under specific terms and are issued by the Group for the purpose of ensuring that its customers will fulfill the terms of their contractual obligations.

In addition, contingent liabilities for the Group arise from undrawn loan commitments that may be drawn upon if certain requirements are fulfilled by counterparties.

The outstanding balances are as follows:

	31.12.2020	31.12.2019
Letters of credit	33,908	35,927
Letters of guarantee and other guarantees	3,463,297	3,411,293
Undrawn loan commitments	4,472,897	4,021,955

The Group measures the expected credit losses for all the undrawn loan commitments and letters of credit / letters of guarantee, which are included in the caption "Provisions".

Expected credit losses of the aforementioned exposures as of 31.12.2020 amounts to € 91,482 (31.12.2019: € 93,440) (note 33).

The Bank has committed to contribute in the share capital of the joint venture Alpha TANEO AKES up to the amount of € 23 (31.12.2019: € 23).

* These companies have not been audited by the tax authorities since the commencement of their operations.

** These companies received tax certificate for the years 2011 up to and including 2019 without any qualification whereas the years up to and including 2014 are considered as closed in accordance with the circular POL.1208/20.12.2017 (note 8).

*** These companies have been audited by the tax authorities up to and including 2009 in accordance with Law 3888/2010 which relates to voluntary settlement for the unaudited tax years.

**** These companies are not subject to a tax audit.

209 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

d. Pledged assets

Pledged assets, as at 31.12.2020 and 31.12.2019 are analyzed as follows:

- **Cash and balances with Central Banks:**

As at 31.12.2020 Cash and balances with Central Banks amounting to € 208,375 (31.12.2019: € 318,803 concerning the Group's obligation to maintain deposits in Central Banks according to percentages determined by the respective country. The amount of reserved funds that the Bank has to maintain to the Bank of Greece on average for the period from 19.12.2020 to 29.01.2021, amounts to € 382,442 (31.12.2019: € 354,853) and is included in the above balance. As at 31.12.2020 the pledged cash of the Bank amounts to € 0 (31.12.2019: € 0).

- **Due from Banks:**

i. Placements amounting to € 190,871 (31.12.2019: € 212,006) relate to guarantees provided, mainly, on behalf of the Greek Government.

ii. Placements amounting to € 1,632,298 (31.12.2019: € 1,345,304) have been provided as guarantee for derivative and other repurchase agreements (repos).

iii. Placements amounting to € 64,125 (31.12.2019: € 6,455) have been provided for Letter of Credit or Guarantee Letters that the Bank issue for facilitating customer imports.

iv. Placements amounting to € 16,066 (31.12.2019: € 12,568) have been provided to the Resolution Fund as irrevocable payment commitment, as part of the 2016 up to 2020 contribution. This commitment must be fully covered by collateral exclusively in cash, as decided by the Single Resolution Board.

v. Placements amounting to € 14,472 (31.12.2019: € 20,824) have been used as collateral for the issuance of bonds with nominal value of € 2,900,000 (31.12.2019: € 3,700,000) out of which bonds with nominal value of € 2,200,000 (31.12.2019: € 3,000,000) held by the Bank, as mentioned below under "Loans and advances to customers"

- **Loans and advances to customers:**

i. Loans of € 5,256,013 (31.12.2019: € 1,425,026) have been pledged to central banks for liquidity purposes.

ii. Corporate loans and credit cards of carrying amount of € 1,577,200 (31.12.2019: € 2,822,179) have been securitized for the issuance of Special Purpose Entities' corporate bond of a nominal value of € 1,853,735 (31.12.2019: € 3,274,200) held by the Bank, of which a nominal amount of € 166,000 (31.12.2019: € 2,035,800) has been given as collateral for repos transactions.

iii. Shipping loan of carrying amount of € 206,787 (31.12.2019: € 335,594), has been securitized for the purpose of financing the Group's Special Purpose Entity. This loan was repurchased by the Bank within September while its nominal value on 31.12.2020 amounts to € 39,771 (31.12.2019: € 154,432).

iv. Consumer loans of a carrying amount of € 493,145 (31.12.2019: € 499,242) have been securitized for the issuance of Special Purpose Entities' corporate bond of a nominal value as at 31.12.2020 of € 580.000 (31.12.2019: € 580.000), of which the amount of € 580,000 (31.12.2019: € 360,000) is held by the Bank.

v. An amount of nominal value € 6,236 (31.12.2019: € 11,174) which relates to corporate loans, has been given as collateral for other loan facilities.

vi. An amount of mortgage loans of a nominal value of € 3,370,323 has been used as collateral in the following covered bond issuance programs: Covered Bonds Issuance Program I and Covered Bond Issuance Program II and in Direct Issuance of Covered Bonds Program of Alpha Bank Romania. On 31.12.2020 the nominal value of the above bonds amounted to € 2,900,000 of which the Bank owns € 2,200,000 and has been pledged to Central Banks for liquidity purposes. Respectively on 31.12.2019 mortgage loans of a carrying amount of € 4,651,208 had been used as collateral in Covered Bonds Issuance Programs I and II,the Secured Notes Program of the Bank and in Direct Issuance of Covered Bonds Program of Alpha Bank Romania. On 31.12.2019 the nominal amount of the relates notes issued amounted to € 3,700,000, of which € 3,000,000 was held by the Bank and had been used as collateral in the context of repurchase agreements (repos) by an amount of € 800,000 and the amount of € 2,200,000 had been pledged to Central Banks for liquidity purposes.

- **Investment securities:**

i. Bonds issued by the Greek Government with a carrying amount of € 4,118,026 (31.12.2019: € 0) has been given to the European Central Bank for liquidity purposes.

ii. Treasury Bills issued by the Greek government with a carrying amount of € 708,784 (31.12.2019: € 0), have been given to tha European Central Bank for liquidity purposes.

iii. Bonds issued by Other governments of a carrying amount of € 2,489,904 (31.12.2019: € 1,204,664 have been given as a collateral to Central Banks for liquidity purposes

iv. Securities issued by the European Financial Stability Facility (EFSF) of a carrying amount € 224,201 (31.12.2019: € 188,129), which has been pledged to Central Banks with the purpose to participate in main refinancing operations.

v. Bonds issued by the Greek government with a carrying amount of € 361,694 (31.12.2019: € 3,938,225) which have been given as a collateral in the context of repo agreements.

vi. Treasury Bills issued by the Greek government with of a carrying amount of € 0 (31.12.2019: € 99,936) which have been given as a collateral in the context of repo agreements.

vii. Other securities issued with a carrying amount of € 47,937 (31.12.2019: € 40,797) have been given as a collateral in the context of repo agreements and a carrying amount of € 0 (31.12.2019: € 701,832) relates to securities issued by other countries, given as a collateral in the context of repo agreements.

Additionally, the Group has obtained:

i. Greek Government treasury bills of nominal value of € 900,000 (31.12.2019: € 870,000) as collateral for derivatives transactions with the Greek State of which a nominal value of € 20,000 (31.12.2019: € 118,000) have been given as a collateral in the context of repo agreements.

ii. Bonds with a nominal value of € 219,582 (31.12.2019 € 1,127,750) and a fair value of € 240,081 (31.12.2019 € 1,163,277) which are not recognized in Banks' balance sheet. From these securities a fair value of € 215,206 (31.12.2019 € 732,960) has been pledged to Central Banks for liquidity purposes and a fair value of € 5,698 (31.12.2019: € 430,316) has been given as a collateral in the context of repo agreements.

40. Group Consolidated Companies

The consolidated financial statements, apart from the parent company Alpha Bank include the following entities:

a. Subsidiaries

	Name	Country	Group's ownership interest %	
			31.12.2020	31.12.2019
	Banks			
1	Alpha Bank London Ltd	United Kingdom	100.00	100.00
2	Alpha Bank Cyprus Ltd	Cyprus	100.00	100.00
3	Alpha Bank Romania S.A.	Romania	99.92	99.92
4	Alpha Bank Albania SH.A.	Albania	100.00	100.00
	Financing companies			
1	Alpha Leasing A.E.	Greece	100.00	100.00
2	Alpha Leasing Romania IFN S.A.	Romania	100.00	100.00
3	ABC Factors A.E.	Greece	100.00	100.00
4	Cepal Holdings A.E.	Greece	100.00	
	Investment Banking			
1	Alpha Finance A.E.P.E.Y.	Greece	100.00	100.00
2	SSIF Alpha Finance Romania S.A.	Romania	99.98	99.98
3	Alpha Ventures A.E.	Greece	100.00	100.00
4	Alpha A.E. Ventures Capital Management - AKES	Greece	100.00	100.00
5	Emporiki Ventures Capital Developed Markets Ltd	Cyprus	100.00	100.00
6	Emporiki Ventures Capital Emerging Markets Ltd	Cyprus	100.00	100.00
	Asset Management			
1	Alpha Asset Management A.E.D.A.K.	Greece	100.00	100.00
2	ABL Independent Financial Advisers Ltd	United Kingdom	100.00	100.00
	Insurance			
1	Alpha Insurance Agents A.E.	Greece	100.00	100.00
2	Alpha Insurance Brokers Srl	Romania	100.00	100.00
3	Alphalife A.A.E.Z.	Greece	100.00	100.00
	Real Estate and Hotel			
1	Alpha Astika Akinita A.E.	Greece	93.17	93.17
2	Alpha Real Estate Management and Investments S.A.	Greece	100.00	100.00
3	Alpha Real Estate Bulgaria E.O.O.D.	Bulgaria	93.17	93.17
4	Chardash Trading E.O.O.D.	Bulgaria	93.17	93.17
5	Alpha Real Estate Services Srl	Romania	93.17	93.17
6	Alpha Investment Property Attikis A.E.	Greece	100.00	100.00
7	Alpha Investment Property Attikis II A.E.	Greece	100.00	100.00
8	AGI-RRE Participations 1 Srl	Romania	100.00	100.00
9	Stockfort Ltd	Cyprus	100.00	100.00
10	Romfelt Real Estate S.A.	Romania	99.99	99.99
11	AGI-RRE Zeus Srl	Romania	100.00	100.00
12	AGI-RRE Poseidon Srl	Romania	100.00	100.00
13	AGI-RRE Hera Srl	Romania	100.00	100.00
14	Alpha Real Estate Services LLC	Cyprus	93.17	93.17
15	AGI-BRE Participations 2 E.O.O.D.	Bulgaria	100.00	100.00
16	AGI-BRE Participations 2BG E.O.O.D.	Bulgaria	100.00	100.00
17	AGI-BRE Participations 3 E.O.O.D.	Bulgaria		100.00
18	AGI-BRE Participations 4 E.O.O.D.	Bulgaria	100.00	100.00
19	APE Fixed Assets A.E.	Greece	72.20	72.20
20	SC Cordia Residence Srl	Romania		100.00
21	AGI-RRE Cleopatra Srl	Romania	100.00	100.00
22	SC Carmel Residential Srl	Romania	100.00	100.00

212 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Name		Country	Group's ownership interest %	
			31.12.2020	31.12.2019
23	Alpha Investment Property Neas Kifissias A.E.	Greece	100.00	100.00
24	Alpha Investment Property Kallirois A.E.	Greece	100.00	100.00
25	AGI-Cypre Alaminos Ltd	Cyprus		100.00
26	AGI-Cypre Tochni Ltd	Cyprus	100.00	100.00
27	AGI-Cypre Mazotos Ltd	Cyprus	100.00	100.00
28	Alpha Investment Property Livadias A.E.	Greece	100.00	100.00
29	Asmita Gardens Srl	Romania	100.00	100.00
30	Alpha Investment Property Kefalariou A.E.	Greece	54.17	54.17
31	Cubic Center Development S.A.	Romania	100.00	100.00
32	Alpha Investment Property Neas Erythreas A.E.	Greece	100.00	100.00
33	AGI-SRE Participations 1 D.O.O.	Serbia	100.00	100.00
34	Alpha Investment Property Spaton A.E	Greece	100.00	100.00
35	TH Top Hotels Srl	Romania	97.50	97.50
36	Alpha Investment Property Kallitheas A.E.	Greece	100.00	100.00
37	Kestrel Enterprise E.O.O.D.	Bulgaria	100.00	100.00
38	Beroe Real Estate E.O.O.D.	Bulgaria		100.00
39	Alpha Investment Property Irakleiou A.E.	Greece	100.00	100.00
40	Alpha Investment Property GI I A.E.	Greece		100.00
41	AGI-Cypre Property 2 Ltd	Cyprus	100.00	100.00
42	AGI-Cypre Property 3 Ltd	Cyprus		100.00
43	AGI-Cypre Property 4 Ltd	Cyprus	100.00	100.00
44	AGI-Cypre Property 5 Ltd	Cyprus	100.00	100.00
45	AGI-Cypre Property 6 Ltd	Cyprus	100.00	100.00
46	AGI-Cypre Property 8 Ltd	Cyprus	100.00	100.00
47	AGI-Cypre Property 7 Ltd	Cyprus	100.00	100.00
48	ABC RE L1 Ltd	Cyprus		100.00
49	AGI-Cypre Property 9 Ltd	Cyprus	100.00	100.00
50	AGI-Cypre Property 10 Ltd	Cyprus	100.00	100.00
51	AGI-Cypre Property 11 Ltd	Cyprus	100.00	100.00
52	AGI-Cypre Property 12 Ltd	Cyprus	100.00	100.00
53	AGI-Cypre Property 13 Ltd	Cyprus	100.00	100.00
54	AGI-Cypre Property 14 Ltd	Cyprus	100.00	100.00
55	AGI-Cypre Property 15 Ltd	Cyprus	100.00	100.00
56	AGI-Cypre Property 16 Ltd	Cyprus	100.00	100.00
57	AGI-Cypre Property 17 Ltd	Cyprus	100.00	100.00
58	AGI-Cypre Property 18 Ltd	Cyprus	100.00	100.00
59	AGI-Cypre Property 19 Ltd	Cyprus	100.00	100.00
60	AGI-Cypre Property 20 Ltd	Cyprus	100.00	100.00
61	AGI-Cypre RES Pafos Ltd	Cyprus	100.00	100.00
62	AGI-Cypre P&F Nicosia Ltd	Cyprus	100.00	100.00
63	ABC RE P1 Ltd	Cyprus	100.00	100.00
64	ABC RE P2 Ltd	Cyprus	100.00	100.00
65	ABC RE P3 Ltd	Cyprus	100.00	100.00
66	ABC RE L2 Ltd	Cyprus	100.00	100.00
67	ABC RE P4 Ltd	Cyprus	100.00	100.00
68	AGI-Cypre RES Nicosia Ltd	Cyprus	100.00	100.00
69	AGI-Cypre P&F Limassol Ltd	Cyprus	100.00	100.00
70	AGI-Cypre Property 21 Ltd	Cyprus	100.00	100.00
71	AGI-Cypre Property 22 Ltd	Cyprus	100.00	100.00
72	AGI-Cypre Property 23 Ltd	Cyprus	100.00	100.00
73	AGI-Cypre Property 24 Ltd	Cyprus	100.00	100.00
74	ABC RE L3 Ltd	Cyprus	100.00	100.00

213 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Name		Country	Group's ownership interest %	
			31.12.2020	31.12.2019
75	ABC RE P&F Limassol Ltd	Cyprus	100.00	100.00
76	AGI-Cypre Property 25 Ltd	Cyprus	100.00	100.00
77	AGI-Cypre Property 26 Ltd	Cyprus	100.00	100.00
78	ABC RE COM Pafos Ltd	Cyprus	100.00	100.00
79	ABC RE RES Larnaca Ltd	Cyprus	100.00	100.00
80	AGI-Cypre P&F Pafos Ltd	Cyprus	100.00	100.00
81	AGI Cypre Property 27 Ltd	Cyprus	100.00	100.00
82	ABC RE L4 Ltd	Cyprus	100.00	100.00
83	ABC RE L5 Ltd	Cyprus	100.00	100.00
84	AGI-Cypre Property 28 Ltd	Cyprus	100.00	100.00
85	AGI-Cypre Property 29 Ltd	Cyprus	100.00	100.00
86	AGI-Cypre Property 30 Ltd	Cyprus	100.00	100.00
87	AGI-Cypre COM Pafos Ltd	Cyprus	100.00	100.00
88	AIP Industrial Assets Athens S.M.S.A.	Greece	100.00	100.00
89	AGI-Cypre Property 31 Ltd	Cyprus	100.00	100.00
90	AGI-Cypre Property 32 Ltd	Cyprus	100.00	100.00
91	AGI-Cypre Property 33 Ltd	Cyprus	100.00	100.00
92	AGI-Cypre Property 34 Ltd	Cyprus	100.00	100.00
93	Alpha Group Real Estate Ltd	Cyprus	100.00	100.00
94	ABC RE P&F Pafos Ltd	Cyprus	100.00	100.00
95	ABC RE P&F Nicosia Ltd	Cyprus	100.00	100.00
96	ABC RE RES Nicosia Ltd	Cyprus	100.00	100.00
97	Fierton Ltd	Cyprus	100.00	100.00
98	AIP Industrial Assets Rog S.M.S.A.	Greece	100.00	100.00
99	AIP Attica Residential Assets I S.M.S.A.	Greece	100.00	100.00
100	AIP Thessaloniki Residential Assets S.M.S.A.	Greece	100.00	100.00
101	AIP Cretan Residential Assets S.M.S.A.	Greece	100.00	100.00
102	AIP Aegean Residential Assets S.M.S.A.	Greece	100.00	100.00
103	AIP Ionian Residential Assets S.M.S.A.	Greece	100.00	100.00
104	AIP Commercial Assets City Centres S.M.S.A.	Greece	100.00	100.00
105	AIP Thessaloniki Commercial Assets S.M.S.A.	Greece	100.00	100.00
106	AIP Commercial Assets Rog S.M.S.A.	Greece	100.00	100.00
107	AIP Attica Retail Assets I S.M.S.A.	Greece	100.00	100.00
108	AIP Attica Retail Assets II S.M.S.A.	Greece	100.00	100.00
109	AIP Attica Residential Assets II S.M.S.A.	Greece	100.00	100.00
110	AIP Retail Assets Rog S.M.S.A.	Greece	100.00	100.00
111	AIP Land II S.M.S.A.	Greece	100.00	100.00
112	ABC RE P6 Ltd	Cyprus	100.00	100.00
113	AGI-Cypre Property 35 Ltd	Cyprus	100.00	100.00
114	AGI-Cypre P&F Larnaca Ltd	Cyprus	100.00	100.00
115	AGI-Cypre Property 37 Ltd	Cyprus	100.00	100.00
116	AGI-Cypre RES Ammochostos Ltd	Cyprus	100.00	100.00
117	AGI-Cypre Property 36 Ltd	Cyprus	100.00	100.00
118	AGI-Cypre Property 38 Ltd	Cyprus	100.00	100.00
119	AGI-Cypre RES Larnaca Ltd	Cyprus	100.00	100.00
120	ABC RE P7 Ltd	Cyprus	100.00	100.00
121	AGI-Cypre Property 42 Ltd	Cyprus	100.00	100.00
122	ABC RE P&F Larnaca Ltd	Cyprus	100.00	100.00
123	Krigeo Holdings Ltd	Cyprus	100.00	100.00
124	AGI-Cypre Property 43 Ltd	Cyprus	100.00	100.00
125	AGI-Cypre Property 44 Ltd	Cyprus	100.00	100.00
126	Reoco Orion X S.M.S.A.	Greece	100.00	

 The amounts are presented in thousands of Euro unless otherwise indicated

	Name	Country	Group's ownership interest %	
			31.12.2020	31.12.2019
127	Reoco Galaxy II S.M.S.A.	Greece	100.00	
128	Reoco Galaxy IV S.M.S.A.	Greece	100.00	
129	AGI-Cypre Property 40 Ltd	Cyprus	100.00	
130	ABC RE RES Ammochostos Ltd	Cyprus	100.00	
131	ABC RE RES Paphos Ltd	Cyprus	100.00	
132	Sapava Ltd	Cyprus	100.00	
133	AGI-Cypre Property 46 Ltd	Cyprus	100.00	
134	AGI-Cypre Property 47 Ltd	Cyprus	100.00	
135	AGI-Cypre Property 48 Ltd	Cyprus	100.00	
136	Alpha Credit Property 1 Ltd	Cyprus	100.00	
137	Office PARK I Srl	Cyprus	100.00	
138	Acarta Construct Srl	Romania	100.00	
139	AGI-Cypre Property 45 Ltd	Cyprus	100.00	
140	AGI-Cypre Com Nicosia Ltd	Cyprus	100.00	
141	AGI-Cypre Property 49 Ltd	Cyprus	100.00	
142	AGI-Cypre Property 50 Ltd	Cyprus	100.00	
143	AGI-Cypre Com Larnaca Ltd	Cyprus	100.00	
	Special purpose and holding entities			
1	Alpha Credit Group Plc	United Kingdom	100.00	100.00
2	Alpha Group Jersey Ltd	Jersey	100.00	100.00
3	Alpha Group Investments Ltd	Cyprus	100.00	100.00
4	Ionian Equity Participations Ltd	Cyprus	100.00	100.00
5	AGI-BRE Participations 1 Ltd	Cyprus	100.00	100.00
6	AGI-RRE Participations 1 Ltd	Cyprus	100.00	100.00
7	Alpha Group Ltd	Cyprus	100.00	100.00
8	Katanalotika Plc	United Kingdom		
9	Epihiro Plc	United Kingdom		
10	Irida Plc	United Kingdom		
11	Pisti 2010-1 Plc	United Kingdom		
12	Alpha Shipping Finance Ltd	United Kingdom		
13	Alpha Proodos DAC	Ireland		
14	Alpha Quantum DAC	Ireland		
15	AGI-RRE Athena Ltd	Cyprus	100.00	100.00
16	AGI-RRE Poseidon Ltd	Cyprus	100.00	100.00
17	AGI-RRE Hera Ltd	Cyprus	100.00	100.00
18	Umera Ltd	Cyprus	100.00	100.00
19	Alpha Holdings S.M.S.A	Greece	100.00	100.00
20	AGI-BRE Participations 2 Ltd	Cyprus	100.00	100.00
21	AGI-BRE Participations 3 Ltd	Cyprus	100.00	100.00
22	AGI-BRE Participations 4 Ltd	Cyprus	100.00	100.00
23	AGI-RRE Ares Ltd	Cyprus	100.00	100.00
24	AGI-RRE Venus Ltd	Cyprus	100.00	100.00
25	AGI-RRE Artemis Ltd	Cyprus	100.00	100.00
26	AGI-BRE Participations 5 Ltd	Cyprus	100.00	100.00
27	AGI-RRE Cleopatra Ltd	Cyprus	100.00	100.00
28	AGI-RRE Hermes Ltd	Cyprus	100.00	100.00
29	AGI-RRE Arsinoe Ltd	Cyprus	100.00	100.00
30	AGI-SRE Ariadni Ltd	Cyprus	100.00	100.00
31	Zerelda Ltd	Cyprus	100.00	100.00
32	AGI-Cypre Evagoras Ltd	Cyprus	100.00	100.00
33	AGI-Cypre Tersefanou Ltd	Cyprus	100.00	100.00
34	AGI-Cypre Ermis Ltd	Cyprus	100.00	100.00

215 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	Name	Country	Group's ownership interest %	
			31.12.2020	31.12.2019
35	AGI-SRE Participations 1 Ltd	Cyprus	100.00	100.00
36	Alpha Credit Acquisition Company Ltd	Cyprus	100.00	100.00
37	Alpha International Holding Company S.A.	Luxembourg	100.00	100.00
38	Orion X Securitisation Designated Activity Company	Ireland		
39	Galaxy Ii Funding Designated Activity Company	Ireland		
40	Galaxy Iii Funding Designated Activity Company	Ireland		
41	Galaxy Iv Funding Designated Activity Company	Ireland		
42	Alpha International Holding S.M.S.A.	Greee	100.00	
	Other companies			
1	Alpha Bank London Nominees Ltd	United Kingdom	100.00	100.00
2	Alpha Trustees Ltd	Cyprus	100.00	100.00
3	Kafe Alpha A.E.	Greece	100.00	100.00
4	Alpha Supporting Services A.E.	Greece	100.00	100.00
5	Real Car Rental A.E.	Greece	100.00	100.00
6	Emporiki Management A.E.	Greece	100.00	100.00
7	Alpha Bank Notification Services A.E.	Greece	100.00	100.00

b. Joint Ventures

	Name	Country	Group's ownership interest %	
			31.12.2020	31.12.2019
1	APE Commercial Property A.E.	Greece	72.20	72.20
2	APE Investment Property A.E.	Greece	71.08	71.08
3	Alpha TANEO AKES	Greece	51.00	51.00
4	Rosequeens Properties Ltd	Cyprus	33.33	33.33
5	Panarae Saturn LP	Jersey	61.58	61.58
6	Alpha Investment Property Commercial Stores A.E.	Greece	70.00	70.00

c. Associates

	Name	Country	Group's ownership interest %	
			31.12.2020	31.12.2019
1	AEDEP Thessalias and Stereas Ellados	Greece	50.00	50.00
2	ALC Novelle Investments Ltd	Cyprus	33.33	33.33
3	Banking Information Systems A.E	Greece	23.77	23.77
4	Propindex AEDA	Greece	35.58	35.58
5	Olganos A.E.	Greece	30.44	30.44
6	Alpha Investment Property Elaiona A.E	Greece	50.00	50.00
7	Famar S.A.	Luxembourg	47.04	47.04
8	Cepal Holdings A.E.	Greece		38.61
9	Perigenis Commercial Assets A.E.	Greece	32.00	

Detailed information on corporate events for the companies included in the consolidated financial statements is set out in note 49.

With respect to Subsidiaries the following are noted:

The subsidiary Stockfort Ltd is a group of companies that includes the company Pernik Logistics Park E.O.O.D.

The Group hedges the foreign exchange risk arising from the net investment in subsidiaries through the use of derivatives in their functional currency.

With respect to Associates and Joint Ventures the following are noted:

216 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

APE Investment Property A.E. is the parent company of a group that includes SYMET A.E., Astakos Terminal A.E., Akarport A.E. and NA.VI.PE A.E. Furthemore, Rosequeens Properties Ltd is the parent company of Rosequeens Properties Srl.

The Group's investment in Rosequeens Properties Ltd is accounted for using the equity method, while the group of APE Investment Property A.E. has been classified as asset held for sale and is measured in accordance with IFRS 5 (note 48).

Acquisitions of companies

In 2020, the Group acquired the control of the company Cepal Holdings S.A. acquiring 100% of its share capital on 22.7.2020 (note 49). The company Cepal Holdings S.A. is a parent of a group of companies that is comprised of the subsidiaries Cepal Hellas FInancial Services Single Member S.A. - Servicing of Receivables from Loans and Credits, Kaican Services Ltd and Kaican Hellas A.E. The main operation of Cepal Group is the management of receivables from loans and credits.

The Bank already held a percentage of 38.61% in the share capital of the company and proceeded with its total acquisition in the context of the implementation of the Strategic Plan 2020-2022 (note 51). The acquisition of the remaining share capital was carried out through the exercise of a put option of the previous shareholder for which the Bank paid cash of € 35,968, while its previously held equity interest was measured at fair value of € 29,953 on the acquisition date. This valuation resulted in a profit of a total amount of € 14,303, which has been recognized in "Gains less losses from financial transactions" in the income statement (note 5). The agreement with the seller provides for the payment of a contigent consideration by the Bank in case Cepal is sold to a third party investor above a predetermined price, the fair value of which was zero on the acquisition date.

The following table shows the temporary values of the net identifiable assets of Cepal Group at the date of acquisition:

	Temporary Fair Value
Cash	1
Due from Banks	7,938
Intangible assets	1,230
Property, plant and equipment	4,027
Deferred tax assets	3,256
Other assets	4,179
Other liabilities	(10,042)
Net Identifiable Assets recognized (A)	**10,589**
Fair Value of previously held equity by the Group (common and preferred shares) (B)	**29,953**
Consideration for extra % (C)	**35,968**
Goodwill (B + C - A)	**55,332**

Based on the temporary values of the assets and liabilities acquired by the Group, goodwill amounting to € 55,332 (note 24) was recognised. It is noted that due to the short period of time that has passed since the acquisition date, the valuation of customer relashionships and the valuation of any contingent liabilities of Cepal Group has not been finalized. The receivables acquired mainly concern deposits and receivables from customers, most of which concern the Bank, therefore it is estimated that any losses from the non-recovery of future contractual cash flows of the receivables acquired will not be material.

After the acquisition of the control of the company Cepal Holdings S.A. the Group recognized after eliminations a total income of € 6,265 and losses before income tax of € 2,238 from the consolidation of its results in the year of 2020. If the acquisition of control had taken place on 1.1.2020, the total income for the Group would have amounted to € 2,603,907 and the profits before income tax to € 93,577.

On 1.12.2020 the transfer of the Bank's Non-performing Exposures Unit was completed for a total consideration of € 240,000. The sale has been financed by the Bank through an increase in the share capital of its subsidiary Cepal Hellas S.M.S.A. by € 147,000 and through a loan of € 130,000. This transaction concerns an intragroup transaction without an impact on the Group.

It is noted that the transfer of the business as well as the planned sale of Cepal, are part of the strategic plan of the Bank for the decrease of its exposure to non-performing loans. The strategic plan includes the securitization and sale of a non-performing loan portfolio, together with the sale of up to 100% of the shares of Cepal ("Project Galaxy") (note 51).

217 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In addition, the Group acquired the control of Acarta Construct Srl by acquiring 100% of its share capital on 15. 12.2020 (note 49) by paying € 0.2 and with an additional consideration of € 1 for the assignment of the right to collect a loan obligation of the company to a subsidiary of the same group to which Acarta Construct Srl belonged, amounting to € 68,260. Acarta Construct Srl is a real estate company and owns a modern office building in Bucharest of a total area of 41,500 sq.m., which the Group intends to use for investment purposes.

The following table shows the temporary values of the net assets of the company at the date of acquisition. Based on the temporary values of the assets and liabilities acquired by the Group, goodwill amounting to € 6,897 was recognised (note 24). Specifically, in the context of the temporary measurement of the fair value of the company's assets and liabilities, the investment property held by the company was valued at € 71,700 and from this measurement arose a deferred tax liability of € 6,492.

	Temporary Fair Value
Receivables from customers	212
Due from Banks	2,479
Property, plant and equipment	195
Investment Property	71,700
Other assets	1,170
Due to Banks	(75,836)
Liabilities for current income tax and other taxes	(4)
Deferred tax liabilities	(6,492)
Provisions	(93)
Other liabilities	(228)
Net Identifiable Assets recognized (A)	(6,897)
Consideration (B)	
Goodwill (B-A)	6,897

Due to the short period of time that has passed since the acquisition date, the valuation of assets, liabilities and the valuation of any contingent liabilities of the Acarta Construct Srl has not been finalized.

Following the acquisition of control of Acarta Construct Srl, the Group recognized after eliminations a total income of € 237 and losses before tax of € 364 from the consolidation of its results in 2020. If the control had been acquired on 1.1.2020, the Group's total income would have amounted to € 2,595,109 and the profits before income tax to € 110,706.

218 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Group subsidiaries with non controlling interests

The table below presents information concerning the Group's subsidiaries with non controlling interests.

Name	Country	Non controlling interests %		Profit/(loss) attributable to non controlling interests		Other comprehensive income recognized directly in Equity for non controlling interests		Non controlling interests	
				From 1 January to		From 1 January to			
		31.12.2020	31.12.2019	31.12.2020	31.12.2019	31.12.2020	31.12.2019	31.12.2020	31.12.2019
1. APE Fixed Assets A.E.	Greece	27.80	27.80	(77)	(70)			11,016	10,868
2. Alpha Astika Akinita A.E.	Greece	6.83	6.83	194	198	(3)	(1)	9,876	9,682
3. Alpha Real Estate Bulgaria E.O.O.D.	Bulgaria	6.83	6.83	(1)	7			30	31
4. Chardash Trading E.O.O.D.	Bulgaria	6.83	6.83	(14)	(66)	(3)		(130)	(113)
5. Alpha Bank Romania S.A.	Romania	0.08	0.08	13	13	(6)	(8)	328	320
6. Romfelt Real Estate S.A.	Romania	0.01	0.01						
7. Alpha Real Estate Services Srl	Romania	6.83	6.83	11	12	(2)	(3)	94	84
8. Alpha Real Estate Services LLC	Cyprus	6.83	6.83	24	21			64	40
9. SSIF Alpha Finance Romania S.A.	Romania	0.02	0.02						
10. Alpha Investment Property Kefalariou AE	Greece	45.83	45.83	71	12			8,083	8,012
11. TH Top Hotels Srl	Romania	2.50	2.50	(13)	(12)	4	5	21	27
Total				**208**	**115**	**(10)**	**(7)**	**29,382**	**28,951**

The percentage of voting rights owned by thrird parties in subsidiaries does not differ from their participation in their share capital.

With respect to the above mentioned subsidiaries, significant non controlling interests exist in Alpha Astika Akinita A.E., Alpha Investment Properties Kefalariou A.E, and in APE Fixed Assets A.E.

A condensed set of financial information of Alpha Astika Akinita A.E., Alpha Investment Property Kefalariou A.E. and APE Fixed Assets A.E., is presented below. Intra-group balances and transactions have not been eliminated in the below presented condensed financial information.

Condensed Statement of Comprehensive Income

	Alpha Astika Akinita A.E.		Alpha Investment Property Kefalariou AE		APE Fixed Assets A.E.	
	From 1 January to		From 1 January to		From 1 January to	
	31.12.2020	31.12.2019	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Total income	12,982	13,989	502	367		
Total expenses	(8,936)	(8,792)	(292)	(286)	(314)	(294)
Profit/(loss) for the year after income tax	**2,846**	**2,894**	**155**	**26**	**(278)**	**(250)**
Total comprehensive income for the year, after income tax	**2,846**	**2,894**	**155**	**26**	**(278)**	**(250)**

Condensed Balance Sheet

	Alpha Astika Akinita A.E.		Alpha Investment Property Kefalariou AE		APE Fixed Assets A.E.	
	31.12.2020	31.12.2019	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Total non-current assets	54,768	55,829	16,980	17,163	39,338	39,346
Total current assets	85,769	81,005	745	362	445	19
Total short-term liabilities	3,951	2,614	99	223	50,820	109
Total long-term liabilities	1,652	1,615	219		930	163
Total Equity	134,933	132,606	17,458	17,303	39,615	39,092

219 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Condensed Statement of Cash Flows

	Alpha Astika Akinita A.E.		Alpha Investment Property Kefalariou AE		APE Fixed Assets A.E.	
	From 1 January to		From 1 January to		From 1 January to	
	31.12.2020	31.12.2019	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Total inflows/(outflows) from operating activities	3,277	3,277	383	(103)	(230)	(54)
Total inflows/(outflows) from investing activities	379	379		367	(144)	
Total inflows/(outflows) from financing activities	(133)	(133)			801	
Total inflows/(outflows) for the year	**3,523**	**3,523**	**383**	**264**	**427**	**(54)**
Cash and cash equivalents at the beginning of the year	**75,706**	**72,183**	**362**	**65**	**18**	**72**
Cash and cash equivalents at the end of the year	**79,229**	**75,706**	**745**	**329**	**445**	**18**

No dividends were distributed by the aforementioned companies, for the years 2020 and 2019.

Significant Restrictions

The Group's significant restrictions regarding the use of assets or the settlement of liabilities, are those imposed by the regulatory framework in which its subsidiaries operate and concerns mainly those that are subject to supervision for their capital adequacy. In particular, the regulatory authorities request, where appropriate and depending on the nature of the company, the compliance with specific thresholds, for example maintaining minimum capital adequacy ratios, holding a predetermined level of highly liquid assets, minimizing their exposure to other Group companies and complying with specified ratios. The total assets and liabilities of the subsidiaries operating in the banking, insurance and other mainly financial sectors with significant restrictions amount to € 9,226,188 (31.12.2019 € 9,468,865) and € 7,987,694 (31.12.2019 € 8,173,170) respectively.

In addition, all Greek subsidiaries are subject to the restrictions imposed by the regulatory framework (Codified Law 4548/2018 or any other specific legislation depending on the nature of their operations) regarding the minimum threshold of the share capital and net assets as well as the ability to distribute dividends and to transfer equity shares.

Moreover, the cash withdrawals and capital restrictions imposed by Legislative Act within 2015 and applied to all companies operating in Greece, ceased to be effective within 2019, according to a relevant amendment incorporated in Law 4624/2019, causing the whole removal of existing restrictions on capital movement until then.

There are no options of protection rights held by third parties in the share capital of subsidiaries that could otherwise limit the Group's ability to utilize those assets or settle the Group's liabilities.

Consolidated structured entities

The Group consolidates eleven special purpose entities which were established to accommodate transactions related to securitized loans granted by Group companies.

During 2020, the Bank, in the context of its strategic plan 2020-2022 that has as a priority the clean up of its balance sheet (note 51), carried out new securitization transactions of non-performing loans, establishing four special purpose entities named Orion X Securitisation Designated Activity Company, Galaxy II Funding Designated Activity Company, Galaxy III Funding Designated Activity Company and Galaxy IV Funding Designated Activity Company. The other securitization transactions that were implemented in previous years aimed to raise liquidity by issuing bonds or other legal form of borrowing.

In all cases, the Group has concluded that it controls these special purpose entities since it has the power over their activities and has a significant exposure to their returns.

As of 31.12.2020, the total of the bonds and other financial instruments issued by the entities are held by the Bank, while as of 31.12.2019 the shipping, consumer and corporate (SME) loans securitization transactions through the entities Alpha Shipping Finance Ltd, Katanalotika Plc and Alpha Proodos Plc were the excpetion as all senior debt was held by third parties outside of the Group.

220 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The table below presents the nominal amount of debt securities or other form of debt issued per special purpose entity:

Name	Nominal value	
	31.12.2020	31.12.2019
Epihiro Plc	500,000	1,593,400
Katanalotika Plc	580,000	580,000
Pisti 2010-1 Plc	586,200	586,200
Irida Plc	474,800	474,800
Alpha Shipping Finance Ltd	39,771	154,431
Alpha Proodos DAC		320,000
Alpha Quantum DAC	292,735	299,800
Orion X Secutitisation DAC	1,923,688	
Galaxy II Funding DAC	5,746,849	
Galaxy III Funding DAC	946,538	
Galaxy IV Funding DAC	3,105,197	

Alpha Proodos securitization transaction was revoked in 2020 with the repayment of all bonds issued.

With resepct to securitization transactions aimed to raise liquidity, depending on the criteria to be met for each securitized portfolio, the Group, without having any relevant contractual obligation, proceeds as appropriate in ad hoc repurchases of securitized loans. In addition, for those securitization transactions that are in replacement period, the Group engages in new securitization transactions of loan portfolios by transferring them to those entities, in order to meet the specific quantitative criteria related to the amounts of the bonds issued. The intention of the Group is to continue this practice.

Furthermore, on 31.12.2020 the Group had granted subordinated loans amounting to € 174,171 (31.12.2019€ 202,251) to the special purpose entities for credit enhancement purposes of the securitization transactions. Apart from the above mentioned loans, the Group has no contractual obligation to grant additional funding to the entities, except for the entities Katanalotika Plc and Alpha Shipping Finance Limited to which the Group is obliged, if needed, to grant additional subordinated loans.

In securitization transactions aimed at the management of non-performing loans, repurchases and new securitizations of loans are carried out on ad hoc basis to optimize the amount of the portfolio in relation to the nominal value of the respective bonds issued by the special purpose entities, depending on their credit rating, as well as individual loan repurchases in order to meet specific loan eligibility criteria set per transaction. In these transactions, the Group has undertaken the contractual obligation to grant loans in order to finance the reserves of the special purpose entities amounting to € 94 million.

Changes of ownership interest in subsidiaries which did not result in loss of control

During 2020 and 2019, there was no change in the shareholder structure of the Group's subsidiaries.

Loss of control in subsidiary due to sale or liquidation

On 7.1.2020, the sale of the shares of the Group's subsidiary, AGI-Cypre Alaminos Ltd was completed for a consideration of € 4,686, while a gain of € 127 was recognized. The total cash reserves of the subsidiary at the time of the sale amount to € 118.

On 11.06.2020, the liquidation process of the Group's subsidiary Cordia Residence Srl was completed with its deletion from the business register of Romania and a loss of € 4 was recognized.

On 30.6.2020, the sale of the shares of the Group's subsidiary, AGI-BRE Participations 3 E.O.O.D., was completed for a consideration of € 10.5 million and a contingent consideration € 2.4 million to be collected over the next 5 years which is measured at fair value under specific terms, while a loss of € 233 was recognized. The total cash reserves of the subsidiary at the time of the sale amount to € 1.209.

On 5.08.2020, the sale of the total shares of the Group's subsidiary ABC-RE L1 Ltd was completed for a consideration of € 950, while a gain of € 151 was recognized. The subsidiary did not have cash reserves at the time of the sale.

On 6.11.2020, the sale of the total shares of the Group's subsidiary AGI-Cypre Property 3 Ltd was completed for a consideration of € 380, while a gain of € 31 was recognized. The total cash reserves of the subsidiary at the time of the sale amount to € 6.

221 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

On 11.12.2020, the liquidation process of the Group's subsidiary Beroe Real Estate EOOD was completed with its deletion from business register of Boulgaria and a loss of € 2 was recognized.

On 24.12.2020 the sale of the total shares of the Group's subsidiary AEP GI I A.E. was completed for a consideration of € 1, while a gain of € 1,975 was recognized. The total cash reserves of the subsidiary at the time of the sale amount to € 171.

Exposure to non-consolidated structured entities

The Group, through its subsidiary Alpha Asset Management AEDAK, manages 41 (31.12.2019: 41) mutual funds which meet the definition of structured entities and at each reporting date, it assesses whether it controls any of these according with the provisions of IFRS 10.

The Group, acting as the manager of the mutual funds has the ability to direct the activities which significantly affect the level of their return by selecting the investments made by the funds within the framework of permitted investments as described in the regulation of each fund. As a result, the Group has power over the mutual funds under management but within a clearly defined decision making framework. Moreover the Group is exposed to variable returns through its involvement in the mutual funds as it receives fees for the purchase, redemption and management of the funds under normal market levels for similar services. The Group also holds direct investments in some of the funds under management, the level of which is assessed to be determined whether it leads to a significant variability in its returns compared to the variability of the respective total rate of return of the mutual fund. Due to these factors, the Group assessed that, for all mutual funds under management, it exercises, for the benefit of unit holders, the decision making rights assigned to it acting as an agent without controlling the mutual funds.

The following table presents by category of investments the total assets of the mutual funds managed but not controlled by the Group.

In particular, the below table shows the total assets of the funds at the balance sheet date and the income recognized in the Group's income statement during the year from the funds under management concerning fees for the disposal, redemption and management services. During the year 2020, the commision income from the management fees of these Mutual Funds amounted to € 17,819 (2019: € 18,084).

	Total assets	
	31.12.2020	**31.12.2019**
Category of Mutual Funds		
Bond Funds	526,439	597,499
Money Market Funds	48,075	61,111
Equity Funds	475,899	508,948
Balanced Funds	471,377	441,592
Total	**1,521,790**	**1,609,151**

On 1.1.2018, the direct investment of the Group in the above mutual funds was classified, in the portfolio of investment securities measured at fair value through profit or loss, under the IFRS 9, as they did not meet the definition of equity instrument. The carrying amount of the investment in mutual funds as at 31.12.2020 amounts to € 65,318 (31.12.2019: € 30,333). The change in the fair value of the aforementioned mutual funds during the year 2020 resulted in a gain of € 747 (year 2019: gain of € 3,647).

It is noted that there is no contractual obligation for the Group to provide financial support to any of the mutual funds under management nor does it guarantee their rate of return.

In addition, the Group manages Alpha TANEO AKES through its subsidiary Alpha A.E. Venture Capital Management -AKES. The mutual fund shareholders of this mutual fund are the Bank owning 51% and the Hellenic Development Bank of Investments S.A. owning 49%. Both parties jointly control the mutual fund and as a result the Group's investment in Alpha TANEO A.K.E.S is accounted for under the equity method. The carrying amount of the Group's investment on 31.12.2020 amounts to € 3,794 (31.12.2019: € 2,848) and has been classified in "Investements in Associates and Joint Ventures". The Group's share of Alpha TANEO AKES profit or loss is presented in note 21. The total assets amounted to € 8,128 as at 31.12.2020 (31.12.2019: € 6,305). The Group's commission income for the management of the mutual fund for 2020 amounted to € 97 (2019: € 91).

222 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The Bank has undertaken the obligation to participate in additional investments in the share capital of the joint venture up to € 23. The aforementioned commitment along with carrying amount of the Group's investment represent the maximum exposure of the Group to Alpha TANEO AKES.

The Group also participates in other structured entities through its investment in venture capital funds which are not managed by the Group, as well as in companies whose operations concern the issuance of asset-backed securities through its investment in their securities. The following table presents the abovementioned Group's investments. Indicatively of the size of those structured entities, the table below presents the total assets of the venture capital funds according to the most recent available financial statements and the total nominal issuance value of the asset-backed securities.

	Carrying Amount		Total Assets / Value of issue	
	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Category of structured entity				
Investment securities - measured at fair value through other comprehensive income				
Venture capital funds	15,153	17,227	247,442	294,477
Asset-backed securities	1,018	1,127	268,774	307,523
Investment securities - measured at fair value through profit or loss				
Asset-backed securities	10,036	9,682	28,500	28,500
Investments in associates and joint ventures				
Venture capital funds	1.920	1,324	3,186	3,196

The Group has committed to participate in further investments of the abovementioned mutual funds up to the amount of € 4,582 (31.12.2019: € 1,951). This commitment and the carrying amount of the investment consist the maximum Group's exposure to these investments.

From its investment in asset-backed securities the Group recognized during 2020 interest income amounting to € 249 (2019: € 246) and gains amounting to € 2 (2019: gains € 39) in "Gains less losses on financial transactions". The Group has no contractual obligation to provide any financial support to the companies issued these securities. The maximum exposure of the Group to losses from the asset-backed securities is not different from their carrying amount.

223 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

41. Disclosures of Law 4261/5.5.2014

Article 81 of Law 4261/5.5.2014 transposed into Greek legislation the Article 89 of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013, according to which, it is enacted for first time the obligation to disclose information on a consolidated basis by Member State and third country in which the Group has headquarters as follows: company name or company names, nature of operations, geographic location, turnover, results before tax, income tax, public subsidies received and the number of full time employees.

The required information is presented below:

Greece

Turnover in Greece for the year ended 31.12.2020 amounted to € 2,897,562, profit before tax amounted to € 221,582, debit income taxes amounted to € (77,681) and the number of employees was 7,510 and the following companies are included:

	Banks
1	Alpha Bank S.A.
	Financing Companies
1	Alpha Leasing A.E.
2	ABC Factors A.E.
3	Cepal Holdings S.A.
	Investment Banking
1	Alpha Finance A.E.P.E.Y.
2	Alpha Ventures A.E.
3	Alpha A.E. Ventures Capital Management-AKES
	Asset Management
1	Alpha Asset Management A.E.D.A.K.
	Insurance
1	Alpha Insurance Agents A.E.
2	Alphalife A.A.E.Z.
	Real Estate and Hotel
1	Alpha Astika Akinita A.E.
2	Alpha Real Estate Management and Investments S.A
3	Alpha Investment Property Attikis A.E.
4	Alpha Investment Property Attikis II A.E.
5	APE Fixed Assets A.E.
6	Alpha Investment Property Neas Kifisias A.E.
7	Alpha Investment Property Kallirois A.E.
8	Alpha Investment Property Livadias A.E.
9	Alpha Investment Property Kefalariou A.E.
10	Alpha Investment Property Neas Erythraias A.E.
11	Alpha Investment Property Spaton A.E.
12	Alpha Investment Property Kallitheas A.E.
13	Alpha Investment Property Irakleiou A.E
14	Alpha Investment Property Gi A.E.
15	AIP Industrial Assets S.M.S.A.
16	AIP Residential Assets Rog S.M.S.A.
17	AIP Attica Residential Assets I S.M.S.A.
18	AIP Thessaloniki Residential Assets S.M.S.A.
19	AIP Cretan Residential Assets S.M.S.A.
20	AIP Aegean Residential Assets S.M.S.A.
21	AIP Ionian Residential Assets S.M.S.A.
22	AIP Commercial Assets City Centres S.M.S.A.
23	AIP Thessaloniki Commercial Assets S.M.S.A.
24	AIP Commercial Assets Rog S.M.S.A.

 The amounts are presented in thousands of Euro unless otherwise indicated

25	AIP Attica Retail Assets I S.M.S.A.
26	AIP Attica Retail Assets II S.M.S.A.
27	AIP Attica Residential Assets II S.M.S.A.
28	AIP Retail Assets Rog S.M.S.A.
29	AIP Land II S.M.S.A.
30	Reoco Orion X S.M.S.A.
31	Reoco Galaxy II S.M.S.A.
32	Reoco Galaxy IV S.M.S.A.
	Special purpose and holding entities
1	Alpha Holdings Single Member S.A
2	Alpha International Holdings S.M.S.A.
	Other
1	Kafe Alpha A.E.
2	Alpha Supporting Services A.E.
3	Real Car Rental A.E.
4	Emporiki Management A.E.
5	Alpha Bank Notification Services A.E.

United Kingdom

Turnover in United Kingdom for the year ended 31.12.2020 amounted to € 23,676, profit before tax amounted to € 1,610, debit income taxes amounted to € (171), the number of employees was 65 and the following companies are included:

	Banks
1	Alpha Bank London Ltd
	Asset Management
1	ABL Independent Financial Advisers Ltd
	Special purpose and holding entities
1	Alpha Credit Group Plc
2	Irida Plc
3	Alpha Shipping Finance Ltd
	Other
1	Alpha Bank London Nominees Ltd

Cyprus

Turnover in Cyprus for the year ended 31.12.2020 amounted to € 38.587, loss before tax amounted to € (322.785), debit income taxes amounted to € (2,695) the number of employees was 531 and the following companies are included:

	Banks
1	Alpha Bank Cyprus Ltd
	Investment Banking
1	Emporiki Ventures Capital Developed Markets Ltd
2	Emporiki Ventures Capital Emerging Markets Ltd
	Real Estate and Hotel
1	Stockfort Ltd
2	AGI-Cypre Alaminos Ltd
3	AGI-Cypre Tochni Ltd
4	AGI-Cypre Mazotos Ltd
5	AGI-Cypre Property 2 Ltd
6	AGI-Cypre Property 3 Ltd
7	AGI-Cypre Property 4 Ltd

225 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

8	AGI-Cypre Property 5 Ltd
9	AGI-Cypre Property 6 Ltd
10	AGI-Cypre Property 8 Ltd
11	Alpha Real Estate Services LLC
12	AGI-Cypre Property 7 Ltd
13	ABC RE L1 Ltd
14	AGI-Cypre Property 9 Ltd
15	AGI-Cypre Property 10 Ltd
16	AGI-Cypre Property 11 Ltd
17	AGI-Cypre Property 12 Ltd
18	AGI-Cypre Property 13 Ltd
19	AGI-Cypre Property 14 Ltd
20	AGI-Cypre Property 15 Ltd
21	AGI-Cypre Property 16 Ltd
22	AGI-Cypre Property 17 Ltd
23	AGI-Cypre Property 18 Ltd
24	AGI-Cypre Property 19 Ltd
25	AGI-Cypre Property 20 Ltd
26	AGI-Cypre Pafos Ltd
27	AGI-Cypre P&F Nicosia Ltd
28	ABC RE P1 Ltd
29	ABC RE P2 Ltd
30	ABC RE P3 Ltd
31	ABC RE L2 Ltd
32	ABC RE P4 Ltd
33	AGI-Cypre RES Nicosia Ltd
34	AGI-Cypre P&F Limassol Ltd
35	AGI-Cypre Property 21 Ltd
36	AGI-Cypre Property 22 Ltd
37	AGI-Cypre Property 23 Ltd
38	AGI-Cypre Property 24 Ltd
39	ABC RE L3 Ltd
40	ABC RE P&F Limassol Ltd
41	AGI-Cypre Property 25 Ltd
42	AGI-Cypre Property 26 Ltd
43	ABC RE COM Pafos Ltd
44	ABC RE RES Larnaca Ltd
45	AGI-Cypre P&F Pafos Ltd
46	AGI Cypre Property 27 Ltd
47	ABC RE L4 Ltd
48	ABC RE L5 Ltd
49	AGI-Cypre Property 28 Ltd
50	AGI-Cypre Property 29 Ltd
51	AGI-Cypre Property 30 Ltd
52	AGI-Cypre COM Pafos Ltd
53	AGI-Cypre Property 31 Ltd
54	AGI-Cypre Property 32 Ltd
55	AGI-Cypre Property 33 Ltd
56	AGI-Cypre Property 34 Ltd
57	Alpha Group Real Estate Ltd
58	ABC RE P&F Pafos Ltd
59	ABC RE P&F Nicosia Ltd
60	ABC RE RES Nicosia Ltd

The amounts are presented in thousands of Euro unless otherwise indicated

61	Fierton Ltd
62	ABC RE P6 Ltd
63	AGI-Cypre Property 35 Ltd
64	AGI-Cypre P&F Larnaca Ltd
65	AGI-Cypre Property 37 Ltd
66	AGI-Cypre RES Ammochostos Ltd
67	AGI-Cypre Property 36 Ltd
68	AGI-Cypre Property 38 Ltd
69	AGI-Cypre RES Larnaca Ltd
70	ABC RE P7 Ltd
71	AGI-Cypre Property 42 Ltd
72	ABC RE P&F Larnaca Ltd
73	Krigeo Holdings Ltd
74	AGI-Cypre Property 40 Ltd
75	AGI-Cypre Property 43 Ltd
76	AGI-Cypre Property 44 Ltd
77	AGI-Cypre Property 45 Ltd
78	ABC RE RES Ammochostos Ltd
79	ABC RE RES Paphos Ltd
80	Sapava Ltd
81	AGI-Cypre Property 46 Ltd
82	AGI-Cypre Property 47 Ltd
83	AGI-Cypre Property 48 Ltd
84	Alpha Credit Property 1 Ltd
85	AGI-Cypre COM Nicosia Ltd
86	AGI-Cypre Property 49 Ltd
87	AGI-Cypre Property 50 Ltd
88	AGI-Cypre COM Larnaca Ltd
	Special purpose and holding entities
1	Alpha Group Investments Ltd
2	Ionian Equity Participations Ltd
3	AGI-BRE Participations 1 Ltd
4	AGI-RRE Participations 1 Ltd
5	Alpha Group Ltd
6	AGI-RRE Athena Ltd
7	AGI-RRE Poseidon Ltd
8	AGI-RRE Hera Ltd
9	Umera Ltd
10	AGI-BRE Participations 2 Ltd
11	AGI-BRE Participations 3 Ltd
12	AGI-BRE Participations 4 Ltd
13	AGI-RRE Ares Ltd
14	AGI-RRE Venus Ltd
15	AGI-RRE Artemis Ltd
16	AGI-BRE Participations 5 Ltd
17	AGI-RRE Cleopatra Ltd
18	AGI-RRE Hermes Ltd
19	AGI-Cypre Arsinoe Ltd
20	AGI-SRE Ariadni Ltd
21	Zerelda Ltd
22	AGI-Cypre Evagoras Ltd
23	AGI-Cypre Tersefanou Ltd
24	AGI-Cypre Ermis Ltd

227 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

25	AGI-SRE Participations 1 Ltd
26	Alpha Credit Acquisition Company Ltd
	Other
1	Alpha Trustees Ltd

Luxembourg

Turnover in Luxembourg for the year ended 31.12.2020 amounted to € 0, loss before tax amounted to € 69, debit income taxes amounted to € (1), and the following company is included:

	Special purpose and holding entities
1	Alpha International Holding Company S.A.

Romania

Turnover in Romania for the year ended 31.12.2020 amounted to € 179,431, profit before tax amounted to € 17,333, debit income taxes amounted to € (2,929), the number of employees was 2,006 and the following companies are included:

	Banks
1	Alpha Bank Romania S.A.
	Financing Companies
1	Alpha Leasing Romania IFN S.A.
	Investment Banking
1	SSIF Alpha Finance Romania S.A.
	Insurance
1	Alpha Insurance Brokers Srl
	Real Estate and Hotel
1	Alpha Real Estate Services Srl
2	AGI-RRE Participations 1 Srl
3	Romfelt Real Estate S.A.
4	AGI-RRE Zeus Srl
5	AGI-RRE Poseidon Srl
6	AGI-RRE Hera Srl
7	AGI-RRE Cleopatra Srl
8	SC Cordia Residence Srl
9	SC Carmel Residential Srl
10	Asmita Gardens Srl
11	Cubic Center Development S.A.
12	TH Top Hotels Srl
13	Office Park I Srl
14	Acarta Construct Srl

Serbia

Turnover in Serbia for the year ended 31.12.2020 amounted to € 2, loss before tax amounted to € (337) and the following company is included:

	Real Estate and Hotel
1	AGI-SRE Participations 1 DOO

228 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Albania

Turnover in Albania for the year ended 31.12.2020 amounted to € 23,452, gain before tax amounted to € 1,246, the number of employees was 416 and the following company is included:

	Banks
1	Alpha Bank Albania SH.A.

Bulgaria

Turnover in Bulgaria for the year ended 31.12.2020 amounted to € 984, loss before tax amounted to € (1,920) and the following companies are included:

	Real Estate and Hotel
1	Alpha Real Estate Bulgaria E.O.O.D.
2	Chardash Trading E.O.O.D.
3	AGI-BRE Participations 2 E.O.O.D.
4	AGI-BRE Participations 2BG E.O.O.D.
5	AGI-BRE Participations 3 E.O.O.D.
6	AGI-BRE Participations 4 E.O.O.D.
7	Kestrel Enterprise E.O.O.D.
8	Beroe Real Estate E.O.O.D.

Jersey

Turnover in Jersey for the year ended 31.12.2020 amounted to € 3 and the loss before tax amounted to € (158).

	Special purpose and holding entities
1	Alpha Group Jersey Ltd

Ireland

Turnover in Ireland for the year ended 31.12.2020 amounted to € 2,689.

	Special purpose and holding entities
1	Alpha Proodos DAC
2	Alpha Quantum Plc

Neither the Bank nor any of the Group companies have received any public subsidies.

Article 82 of Law 4261/5.5.2014 transposed into Greek Law article 90 of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013, which establishes for the first time the requirement to disclose total return on assets.The total return on the assets of the Group* for the year 2020 amounted to 0.16% (31.12.2019: 0.17%).

* In accordance with the guidance of European Securities and Markets Authority (ESMA), the definition and the detailed calculation of the ratio is included in the appendix of the Annual Financial Statements.

229 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

42. Operating segments

a. Analysis by operating segment

(In millions of Euro)

	1.1 - 31.12.2020						
	Retail Banking	Corporate Banking	Asset Management/ Insurance	Investment Banking/ Treasury	South-Eastern Europe	Other / Elimination Center	Group
Net interest income	650.4	520.1	14.5	153.8	201.7	1.2	1,541.7
Net fee and commission income	110.6	106.8	51.9	32.1	34.1	(0.1)	335.4
Other income	61.8	(9.0)	4.5	610.1	19.2	27.9	714.5
Total income	**822.8**	**617.9**	**70.9**	**796.0**	**255.0**	**29.0**	**2,591.6**
Total expenses (excluding expenses for separation schemes)	**(566.3)**	**(166.1)**	**(38.1)**	**(30.2)**	**(254.6)**	**(76.5)**	**(1,131.8)**
Impairment losses and provisions to cover credit risk	(898.4)	(236.0)		(2.7)	(169.2)	0.1	(1,306.2)
Impairment losses on other financial instruments			(1.1)	(11.7)	(0.6)		(13.4)
Expenses for separation schemes						(26.0)	(26.0)
Profit/(losses) before income tax	**(641.9)**	**215.8**	**31.7**	**751.4**	**(169.4)**	**(73.4)**	**114.2**
Income tax							(10.0)
Profit/(losses) after income tax							**104.2**
Assets 31.12.2020	22,510.6	15,891.6	1,505.5	18,590.0	7,820.0	3,738.9	70,056.6
Liabilities 31.12.2020	28,664.2	8,379.2	2,504.3	16,071.1	5,915.3	189.4	61,723.5
Capital expenditure							
Depreciation and Amortization	(82.8)	(30.4)	(4.4)	(3.9)	(23.7)	(16.2)	(161.4)
Investments in associates and joint ventures						30,716	

Losses before income tax of the operating segment named "Other/Elimination Center" totaling to € 73.4 million include expenses from eliminations between operating segments totaling to € 0.9 million and unallocated amounts totaling to € 72.5 million. These unallocated amounts refer to a) non-reccuring items that do not relate to a specific operating segment and therefore cannot be allocated and b) results from operations that do not represent reportable operating segments.

(In millions of Euro)

	1.1 - 31.12.2019*						
	Retail Banking	Corporate Banking	Asset Management/ Insurance	Investment Banking/ Treasury	South-Eastern Europe	Other / Elimination Center	Group
Net interest income	679.0	519.4	13.8	122.4	210.3	2.4	1.547.3
Net fee and commission income	116.2	125.6	48.1	18.9	31.6	(0.3)	340.1
Other income	15.85	(43.10)	8.65	405.65	25.61	21.26	433.92
Total income	**811.01**	**601.86**	**70.47**	**546.87**	**267.73**	**23.38**	**2.321.32**
Total expenses (excluding expenses for separation schemes)	**(595.3)**	**(178.2)**	**(35.3)**	**(28.7)**	**(212.4)**	**(75.2)**	**(1,125.1)**
Impairment losses and provisions to cover credit risk	(559.6)	(322.8)	0.4	6.0	(114.4)		(990.4)
Expenses for separation schemes						(49.6)	(49.6)
Profit/(losses) before income tax	**(343.90)**	**100.79**	**35.58**	**524.19**	**(59.03)**	**(101.40)**	**156.22**
Income tax							(50.81)
Profit/(losses) after income tax							**105.41**
Assets 31.12.2019	21,840.9	14,884.7	1,411.0	13,964.3	7,955.5	3,401.2	63,457.6
Liabilities 31.12.2019	26,257.8	7,494.2	2,382.1	12,577.2	6,090.3	180.4	54,982.0
Capital expenditure	107.4	44.0	3.7	4.2	37.7	48.0	245.0
Depreciation and Amortization	(75.2)	(28.2)	(4.2)	(3.1)	(24.3)	(9.5)	(144.5)
Investments in associates and joint ventures						13,385	

Losses before income tax of the operating segment named "Other/Elimination Center" totaling to € 101.4 million, include eliminations between operating segments totaling to € 7.1 million and unallocated amounts totaling to € 94.3 million. These

* Certain figures of the previous year have been restated, as described in detail in note 50.

unallocated amounts refer to a) non-recurring items that do not relate to a specific operating segment and therefore cannot be allocated and b) results from operations that do not represent reportable operating segments.

i. Retail Banking

It includes all individuals (retail banking customers), self-employed professionals, small and very small companies operating in Greece and abroad, except from South-Eastern Europe countries.

The Group, through its extended branch network, offers all types of deposit products (deposits/ savings accounts, working capital/ current accounts, investment facilities/ term deposits, Repos, Swaps), loan facilities (mortgages, consumer, corporate loans, letters of guarantee), debit and credit cards of the above customers as well as bankassurance products which are provided through cooperating companies.

ii. Corporate Banking

It includes all medium-sized and large companies, corporates with international business activities, enterprises which cooperate with the Corporate Banking Division, as well as shipping corporations operating in Greece and abroad except for South Eastern European countries. This operating segment offers working capital facilities, corporate loans, and letters of guarantee to the abovementioned corporations. This segment offers also leasing products through the Group's subsidiary named Alpha Leasing A.E. as well as factoring services provided by the Group's subsidiary named ABC Factors A.E.

iii. Asset Management / Insurance

It includes a wide range of asset management services offered through Group's private banking units, its subsidiary Alpha Asset Management A.E.D.A.K. as well as the proceeds from the sale and the management of mutual funds. In addition, it includes income received from the sale of a wide range of insurance products through the Group's subsidiary Alphalife A.A.E.Z.

iv. Investment Banking/Treasury

It includes stock exchange, advisory and brokerage services related to capital markets, and also investment banking facilities, which are offered either by the Bank or specialized subsidiaries (Alpha Finance A.E.P.E.Y., Alpha Ventures S.A.). It also includes the activities of the Dealing Room in the interbank market (FX Swaps, Bonds, Futures, IRS, Interbank placements Loans etc.) as well as operations related to securitization transactions.

v. South-Eastern Europe

It consists of the Group's subsidiaries, which operate in South Eastern Europe.

vi. Other / Elimination Center

This segment includes the non-financial operations of the Goup, as well as unallocated / non-recurring income and expenses and intersegment transactions.

Income and expenses per segment also include transactions between operating segments. All transactions are conducted on market terms. Intersegment transactions are eliminated.

The assets of the operating segments "Retail" and "Corporate Banking" include the following Bank's loans as well as those provided by the Group's subsidiaries ABC Factors A.E. and Alpha Leasing A.E., have been placed under the supervision of the Non-Performing Exposures Strategy, Recovery and Monitoring Division following a full outsourcing to providers of Non-Performing Exposures Management Services (Servicers) from 1.12.2020.

	31.12.2020			31.12.2019		
	Balance before allowance for expected credit losses	Allowance for expected credit losses	Balance after allowance for expected credit losses	Balance before allowance for expected credit losses	Allowance for expected credit losses	Balance after allowance for expected credit losses
Mortgages	6,840,339	1,920,069	4,920,270	7,164,613	(1,832,896)	5,331,717
Consumer Loans	2,844,517	1,650,657	1,193,861	2,985,867	(1,519,454)	1,466,413
Corporate Loans	8,121,832	3,965,965	4,155,867	7,847,306	(3,783,514)	4,063,792
Total	**17,806,689**	**7,536,690**	**10,269,999**	**17,997,786**	**(7,135,864)**	**10,861,922**

231 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

b. Analysis by geographical sector

The breakdown by geographical segment is defined by the country of the business operations of the Group Company.

(in millions of Euro)

	1.1 - 31.12.2020		
	Greece	**Other countries**	**Group**
Net interest income	1,328.1	213.5	1,541.6
Net fee and commission income	298.7	36.6	335.3
Other income	695.0	19.4	714.4
Total income	**2,321.8**	**269.6**	**2,591.4**
Total expenses (excluding provision for separation scheme)	**(886.5)**	**(245.4)**	**(1.131,8)**
Impairment losses and provisions to cover credit risk	(1,136.9)	(169.2)	(1,306.1)
Impairment losses on other financial instruments	(12.8)	(0.6)	(13.4)
Expenses for separation schemes	0.4	(26.4)	(26.0)
Profit/(losses) before income tax	**286.1**	**(172.0)**	**114.1**
Income tax			(10.1)
Profit/(losses) after income tax	**286.1**	**(172.0)**	**103.9**
Non current assets 31.12.2020	1,604.5	363.5	1,968.0

(in millions of Euro)

	1.1 - 31.12.2019*		
	Greece	**Other countries**	**Group**
Net interest income	1,322.9	224.4	1,547.3
Net fee and commission income	306.0	34.1	340.1
Other income	407.8	26.1	433.9
Total income	**2,036.7**	**284.6**	**2,321.3**
Total expenses (excluding provision for separation scheme)	**(893.4)**	**(231.7)**	**(1,125.1)**
Impairment losses and provisions to cover credit risk	(876.0)	(114.4)	(990.4)
Expenses for separation schemes	(49.6)		(49.6)
Profit/(losses) before income tax	**217.8**	**(61.5)**	**156.2**
Income tax			(50.8)
Profit/(losses) after income tax	**217.8**	**(61.5)**	**105.4**
Non current assets 31.12.2019	1,569.0	261.5	1,830.5

For the purposes of the above note, Non-current Assets include:

- Investment property
- Property, Plant and Equipment
- Goodwill and other intangible assets

* Certain figures of the previous year have been restated, as described in detail in note 50.

43. Risk Management

The Group has established a thorough and prudent risk management framework which is being built on best supervisory practices which, considering on the common European legislation and banking system rules, principles and standards is evolved over time in order to be implemented in a coherent and effective manner on the Bank's and Group's companies conduct of the day-to-day business to ensure the effectiveness of the corporate governance of the Group entities.

The Group's critical focus in 2020 was to maintain high standards in corporate governance and compliance with regulatory risk rules and retain confidence in the conduct of its business activities through sound and robust provision of financial services.

RISK MANAGEMENT FRAMEWORK

Governance of Risk Management

The Board of Directors supervises the overall operations of the Risk Management Unit. Regarding Risk Management, the Board of Directors has established a Risk Management Committee (RMC), which convenes on a monthly basis and reports to the BoD. The RMC recommends to the BoD risk undertaking and capital management strategy, checks its implementation and evaluates its effectiveness.

The risk management framework and its effectiveness are re-assessed on a regular basis in order to ensure compliance with International practices as well as with supervisory and regulatory requirements.

For a more comprehensive and effective identification and monitoring of all risk types, Management Committees have been established (Assets and Liabilities Committee, Operational Risk Committee and Credit Risk Committee).

Risk Management Unit

The General Manager - Group Chief Risk Officer supervises the Risk Management Unit of the Group and reports on a regular basis and ad hoc to the Management Committees, the Risk Management Committee and to the Board of Directors. As far as credit risk is concerned the reporting to the above-mentioned Committees covers the following areas:

- The risk profile of portfolios by rating grade.
- The transition among rating grades (migration matrix).
- The estimation of the relevant risk parameters by rating grade, group of clients, etc.
- The trends of basic rating criteria.
- The changes in the rating process, in the criteria or in each specific parameter.
- The concentration risk (by risk type, sector, country, collateral etc.).
- The evolution of Gross Loans, +90 days past due loans, Non-Performing exposures and the monitoring KPIs per segment on a Group basis.
- The Cost of Risk.
- The IFRS 9 Staging transition of exposures per asset class.
- The maximum risk appetite per country, sector, currency, business Units, limit breaches and mitigation plans.

Organizational Structure

In the Group, under the supervision of the General Manager - Group Chief Risk Officer, the following Risk Management Divisions operate within the Group and have been assigned with the responsibility of implementing the risk management framework, according to the principles of the RMC.

- Credit Control Division
  - Credit Risk Policy and Control Division
  - Credit Risk Methodologies Division
  - Credit Risk Cost Assessment Division

- Credit Risk Data and Analysis Division
  - Credit Risk Data Management Division
  - Credit Risk Analysis Division
- Market and Operational Risk Division
- Risk Models Validation Division
- Wholesale Credit Division
- Credit Workout Division
- Retail Credit Division

For credit risk management purposes, facilities are separated into Wholesale and Retail, as described below.

43.1 Credit Risk

WHOLESALE BANKING CREDIT FACILITIES

Wholesale Banking credit facilities are included in each of the following categories subject to the characteristics of the credit facility and the obligor, as shown in the table below:

	Portfolio	Characteristics
Obligors under the competence of Wholesale Banking	Corporate	Companies with turnover > Euro 75 million Includes financing in shipping companies, as well as, obligors under the management of the Investment Banking Division
	SME	Companies with turnover > Euro 2.5 million and up to Euro 75 million or companies with credit limit > Euro 1 million

1. Credit Risk Approval Process

The Group, following best international practices and taking into account the prevailing institutional framework set by legislation, regulations, ministerial decrees/decisions, etc, has established a robust credit risk framework, where the key principles and guidelines, the procedures and actions followed and the responsibilities of all related Units and Officers are clearly defined based on the four eyes principle.

Within this context, all credit proposals are prepared by the Business Units, are reviewed by the Credit Units and are subsequently forwarded for assessment and final decision to the respective Credit Committee based on the total credit exposure, the borrower risk rating, the provided collaterals and the environmental and social risk evaluation.

The limits of the Wholesale Banking Credit Committees are determined in accordance to Total Credit Exposure, defined as the sum of all credit facilities of the obligor (single company or group of associated companies) which can be approved by the Group and include the following:

- Total credit requested exposure
- Working Capital limits
- Withdrawal limits from unclear deposits
- Letters of Credit/Letters of Guarantee limits
- Factoring limits
- Derivative transaction limits
- Corporate Cards limits
- Medium and long-term loans (current outstanding/exposure for facilities that have been fully drawn or limit amount of undrawn facilities).
- Leasing Facilities (current outstanding/exposure for leasing facilities that have been fully drawn or limit amount for undrawn/unused facilities).

- Special credit limits or loans, or any form of personal financing to the company's business owners (mortgage loans, consumer loans, shares' purchase, credit cards etc.).

Wholesale Banking Credit Committees

Credit Committees decisions are multidimensional, with the main assessments performed being as following:

- Approval of the terms of new loans, renegotiations or restructuring of existing credit facilities.
- Approval of the loan pricing, considering the overall profitability of a client's relationship based on the Return on Risk Adjusted Capital – RoRAC (historical RoRAC and post – new money RoRAC).
- Credit Limit Expiry/Renewal date (depending on the customer's credit risk zone) and any deviations from the rule.
- Amendment on the collateral structure.
- Decision on actions in case of activation of early warning triggers.
- Financial Difficulty assessment.
- Unlikeliness to Pay (UTP) assessment.
- Credit Rating decisioning.
- Environmental and Social (E&S) risk assessment.

Credit Committees Structure:

- Wholesale Banking Credit Committee I
- Wholesale Banking Credit Committee II
- Wholesale Banking Credit Committee III
- Wholesale Banking Credit Committee IV
- Wholesale Banking Credit Committee V

Credit Limit Expiry/Renewal date:

The credit limits' expiry/renewal date is determined by the relevant Wholesale Banking Credit Committees. The basic factor for the determination of the credit limit expiry is the client's credit rating, which is not a standalone approval or rejection criterion, but the basis for determining the minimum security/collateral required and the respective pricing. As a rule, for obligors that have been rated in the Low, Medium and Acceptable credit risk zones, reviews are carried out on an **annual basis**, for Watch List clients, on a **semi-annual basis** while obligors that have been rated in the High Risk zone are reviewed on a **quarterly basis**. Deviations from the above rule are not allowed, except when the request by the responsible Business Units is approved by the competent Credit Committees.

2. Credit Risk Measurement and Internal Ratings

The assessment of the borrower's creditworthiness and their rating in credit risk scales is established through rating systems.

The rating of the Group's borrowers with the use of credit risk rating systems constitutes a basic tool for:

- The decision-making process of Credit Committees for the approval/ renewal of credit limits and the implementation of the appropriate pricing policy (interest rate spreads etc.).
- The estimation of the future behavior of borrowers which belong to a group with similar characteristics.
- The early recognition of potential troubled facilities (early alert mechanism) and the prompt, effective action for the minimization of the expected loss for the Group.
- The assessment of the quality of the Group's loan portfolio and the credit risk undertaken.

The aim of the credit risk rating systems is the estimation of the probability that the borrowers will not meet their contractual obligations to the Group as well as the Expected Credit Loss estimation.

The rating systems employed by the Group are the Alpha Bank Rating System (ABRS) and Risk Analyst (RA) which incorporate different credit rating models.

All current and future clients of the Group are assessed based on the appropriate credit risk rating model and within pre-specified time frames.

For the estimation of the probability of default of the obligors of the Group the credit risk rating models evaluate a series of parameters, which can be grouped as follows:

- Financial Analysis: obligor's Financial Ability (liquidity ratios, debt to income, etc.)
- Peers' Analysis: obligor's comparative position in the market in which it operates mostly compared to its peers.
- Behavioral status and history of the obligor with the Group and with third parties (debt in arrears, adverse transaction records, etc).
- Obligor's qualitative characteristics (solid and healthy administration, management succession, appropriate infrastructure and equipment etc.).

The credit rating models which are currently employed by the Group are differentiated according to:

- The turnover of the company.
- The level of the total credit risk exposure.
- The credit facility's specific characteristics.
- The available information for the obligor's assessment. Specifically, for the financial analysis the differentiation relates to the type of the local accounting standards and the International Financial Reporting Standards.

For each of the credit rating models, different parameters may be used, each of which contributes in a specific manner the relevant assessment.

The statistical validation of the credit risk rating models is reviewed regularly in order to ensure the maximum predictive and discriminatory ability according to the supervisory and regulatory framework for credit risk management.

Obligors Rating Scale

Borrowers are rated in the following rating scales:

AA, A+, A, A-, BB+, BB, BB-, B+, B, B-, CC+, CC, CC-, C, D, D0, D1, D2

For special purpose finance (Structured and Shipping Financing) special models have been designed (slotting) with the following categorization scale:

Strong (Class 1), Good (Class 2), Satisfactory (Class 3), Weak (Class 4), Default (D, D0, D1, D2).

For presentation purposes of table "Loans by credit quality and IFRS9 Stage", the "strong" rating includes the rating scales AA, A+, A, A-, BB+ and BB and Categories 1 and 2, "satisfactory" rating includes the rating scales BB-, B+, B, B-, CC+, CC and Category 3, and " under close monitoring" (higher risk) includes the rating scales CC-, C and Category 4. Last, default category, includes the rating scales D, D0, D1, D2.

RETAIL BANKING CREDIT FACILITIES

Retail banking involves the lending facilities offered from the Group to borrowers covering traditional banking products and services such as:

- Housing loans/Mortgages
- Consumer Loans and Credit Cards
- Small businesses and professionals (SB): Individuals and Legal entities with turnover up to Euro 2.5 million and credit limit up to Euro 1 million.

1. Credit Risk Approval Process

The Group monitors customer Total Credit Risk Exposure (For Individuals and Small Businesses), which refers to the sum of all revolving limits of an obligor, all the balances of long term facilities and for the case of small businesses the total exposure of facilities given to stakeholders of customer companies. Additionally, facilities for which the customer is guarantor or co-debtor are also taken into account.

The Group has developed and implemented a strict framework for the conduct of credit policy (legislative and supervisory / regulatory) and has also formulated and put into effect an internal system of credit principles, procedures and rules clearly applicable to the Group's lending business, in order to promote sound practices for managing credit risk.

Credit policies establish the framework for lending and guide the credit-granting activities of Retail Banking through:

- Sound lending management.
- Prudent client selection through in-depth assessment of both financial and qualitative data of the borrower
- Assessing the risk/reward relationship with a respective determination of pricing policy and collateral coverage after taking into account the level of credit risk.
- Monitoring and management of the total credit risk, i.e. the consolidated risk from any type of credit facility granded by the Alpha Bank Group.

The enforcement of the Credit Policy requires certain criteria to be met. These criteria play a significant role in the achievement and maintenance of a healthy portfolio and in the Group's Capital allocation. In particular:

Individuals

he approval process of credit to individuals (individuals with earnings from salaries, pensions or other sources of income not related with business activities) is performed on the basis of the classification of borrowers into risk groups, which represent a certain level of undertaken risk. The level of risk undertaken by the Group is adjusted, when deemed necessary, according to its credit policy.

The credit assessment for individuals is based upon the following pillars:

- Application fraud detection;
- Willingness to pay;
- Ability to pay;
- Collateral risk.

Small Businesses

Small Businesses are defined as following:

- Personal Companies with turnover up to € 2.5 million and a credit limit up to € 1 million
- Entrepreneurs with a credit limit up to € 1 million
- Legal entities with turnover up to € 2.5 million and a credit limit up to € 1 million.

The creditworthiness of Small Businesses in the Retail Banking sector is related to the creditworthiness of company's stakeholders/ managers of the company and vice versa. Therefore, the evaluation of claims in this category is based on two dimensions:

- The valuation of the creditworthiness of company's stakeholders or business managers.
- The valuation of the creditworthiness of the company.

The creditworthiness of a company's stakeholders or managers is based on the specific pillars:

- Willingness to pay.
- Ability to pay.

Hence, the credit assessment for the small businesses is based on the following:

- Application fraud detection;
- Demographics;
- Financials;
- Behavior;
- Credit Bureau;
- Qualitative data; and

- Collateral risk.

2. Internal Models

The fundamental parameter in assessing Retail Banking Credit Risk is the Credit Scoring Models that are developed and employed throughout the credit cycle at the Group level. The above models segments populations into homogenous risk groups (pools) and are categorized as follows:

- Behavior Models, which assess the customer's performance and predict the probability of defaulting within the following months;
- Application Credit Scoring Models, which assess application data—mainly demographic that predict the probability of defaulting within the following months; and
- Models for the assessment of regulatory parameters. It is noted that since 1.1.2018, the Bank's and Group's companies credit risk assessment models are in line with International Financial Reporting Standard 9 (IFRS 9).

These models and the probabilities of default that derive from them, contribute a significant role in risk management and decision making throughout the Group.

Specifically, the models are used in the following segments:

- Decision making of credit assessment and credit limit assignment.
- Impairment assessments
- Predicting future performance of customers belonging to the same pool of common characteristics.
- Tracing high risk accounts in time to schedule all necessary actions so as to reduce expected losses for the Group.
- Assessing the Group's portfolio quality and credit risk.

The parameters taken into account vary, according to the model's type and product category that it assesses. Indicatively, some factors are:

- Personal/demographic data: the customer's age, profession, marital status, or current address;
- Loan characteristics: product applied for, loan term, loan amount, or financing purpose;
- Behavioral data: payments during latest period of time, maximum delinquency, outstanding loan balance versus loan limit, transaction type;
- Qualitative data: Activity Sector, Number of Employees, Company Type.

Models are reviewed, validated and updated on a yearly basis and are subject to quality control so as to ensure at their predictive power at any point in time.

Furthermore, on a regular basis the Group conducts exercises simulating crisis situations (Stress Tests), which explore the potential impact on the financial results of the Group due to unfavorable developments both in obligors' transactional behavior as well as in the broader financial macroeconomic environment.

For presentation purposes of table "Loans by credit quality and IFRS 9 Stage", the classification in "Strong", "Satisfactory" and "Watchlist" categories, for Retail Banking loans is based on the twelve-month Probability of Default. The range of probabilities that determines this classification, has derived from an analysis aiming at optimizating discriminatory power between categories; therefore ranges might differ for each portfolio and for each subsidiary- Specifically for the Bank, the range of probability default which determine the classification of a loans is presented below:

	Range of probability of default			
Rating Classification	**Mortgages**	**Consumer**	**Credit cards**	**Small Business**
Strong	up to 3%	up to 4.0%	up to 3.8%	up to 4.7%
Satisfactory	from 3% up to 16.5%	from 4.0% up to 20%	from 3.8% up to 16%	from 4.7% up to 17%
Watchlist	over 16.5%	over 20%	over 16%	over 17%

238 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

CREDIT CONTROL

According to the risk management and control framework, there are three "lines of defence" with distinctly allocated roles and responsibilities and specifically the Business and Operations Units (first "Line of Defence"), the Risk Management Units (second "Line of Defence") and the Internal Audit Unit (third "Line of Defence").

In the context of the second line of defence operation and within the single context of operations set out for the sectors of Retail Banking, Wholesale Banking and Private and Investment Banking, credit controls are carried out in order to optimise Credit Risk management, to assess the quality of the loan portfolio and to ensure that the first "line of defence" operates within the framework set out for effective Credit Risk management.

This second line of defence is independent and aims, among else, to:

- Design and develop procedures and controls for credit risk management.
- Monitor the adequacy and effectiveness of existing credit risk management procedures.
- Highlight critical issues and deviations from the Group's Manuals and Policies.
- Provide guidelines and instructions related to the procedures for the management of credit risk.
- Provide information to concerned Units about the findings of the controls and any recommendations made.

In order to reinforce the second line of defense the Bank has established, in 2018, the Risk Models Validation Division, an independent division from model development activities, with direct reporting line to General Manager and CRO. The role of Risk Models Validation Division, in the context of the MRM Framework, encompasses different responsibilities and activities related to the monitoring of the performance of the models undertaken by the first line of defense. Its primary task is to independently challenge and ensure that models are sound, fit-for-purpose as well as aligned with the regulatory guidelines. Risk Models Validation Division responsibility is to develop systematic procedures for the evaluation of models' performance as well as model related processes, on a periodic basis. The frequency, rigor and sophistication of the validation process followed for each model is determined by the overall use, complexity and materiality of models, as well as the size and complexity of the Bank's operations. The associated level of inherent model risk, as assessed by the Tiering methodology, determines the validation requirements in terms of frequency, extent and intensity.

CREDIT RISK MITIGATION

Collaterals

Collaterals are received in order to mitigate credit risk that may arise from the obligor's inability to fulfill his contractual obligations, at the loan origination or during the loan lifetime, either by consensus or after forced executions, auctions, etc.

Collaterals include all kind of assets and rights which are made available to the Group either by their debtors or by third parties, in order to be used as complementary liquidity sources of relative loans.

In any case, the necessary legal control of the offered collaterals is carried out, in order to ensure their validity, as well as the possibility to be liquidated or to come into the possession of the Group.

The mitigation tools applied by the Group include two broad categories: intangible and tangible collaterals.

1. Intangible Collaterals- Guarantees

Intangible collaterals form the framework of the obligations and rights that are typically included and described in specific contractual documents that bind the Group and the borrowers during the lending process with specific commitments. The commitments involve a third party who substitutes for the primary debtor in the event of the latter's default or the primary debtor itself (natural or legal entities) to honor the contractual loan agreements and their prompt repayment to the Group and on the other hand the Group has the right to claim them.

The main type of intangible collateral used to protect the Group against debtor insolvency is the Guarantee.

The guarantee constitutes a legal relationship between the guarantor and the lender (Bank), through which the guarantor assumes the responsibility that the debt will be paid. It is drafted in writing and presupposes the existence of a basic legal relationship between the Bank and the borrower (principal debt), i.e. it is a relationship of principal to ancillary.

The guarantor can be an individual or a legal entity and the guarantee can be provided for future or conditional debt.

It is noted that the intangible collaterals include the guarantees of the Greek State which are taken into account in the calculation of the expected credit loss, unlike other intangible collaterals which are not counted in the calculation of the allowance for expected credit losses.

2. Tangible Collaterals

Tangible collaterals provide the Group with the rights over an asset (movable or immovable), owned by the obligor or the guarantor, providing priority in the satisfaction of the creditor by the liquidation proceeds of the asset.

Tangible collaterals are distinguished between mortgages and prenotation on mortgages which are registered over immovable properties and pledges on movable assets (e.g., commodities, checks, bills of exchange) or on claims and rights.

In order to better secure credit facilities granted, all mortgage and pledged assets are covered by an insurance contract, with assignment of the relevant insurance contract to the Bank.

2.1. Mortgages – Prenotation on Mortgages

Mortgages are registered on real estate or immovable assets which can be liquidated as indicatively reported below:

- Residential Real Estate;
- Commercial Real Estate;
- Industrial Buildings;
- Land;
- Mines;
- Ships or aircraft and engines, whether or not movable;
- Machinery or other facilities (engineering, mechanical, electrical, etc.), if they are permanently and consistently connected with the mortgaged estate.

Methods and Frequency of real estate property valuations

According to the Group's Credit Policy, the existence and the valuation of mortgaged property are closely monitored. The property revaluations should be carried out on a yearly basis all property types, except for cases where contract foresees something different, in cases of known changes on the property or in the business process, or in case there are urban planning changes or any other considerable factors. In addition to the review of collateral values, the Group also validates such collateral values on an annual basis.

The initial valuations of a real estate property, provided as collateral, are carried out through on site appraiser visits and internal inspection.

Revaluations of properties, which are collaterals to performing exposures, are mainly carried out using the following methodologies:

- Alignment with the property price statistical index of the Bank of Greece, for the Residential Properties used as collateral on performing exposures of amount up to Euro 3 million.
- Expert input by the authorized engineers, after their visit to the residential property used as collateral or via desktop valuation, if the amount of exposure exceeds Euro 3 million.
- Alignment with the property price statistical index of commercial real estate (CRE) that has been developed by Alpha Astika Akinita S.A. taking into account indices published by Bank of Greece, for certain categories of commercial property, used as collateral on performing exposures up to Euro 1 million.
- Expert input by authorized engineers, after their visit to the professional property used as collateral or by desktop valuation, in cases where the statistical index does not cover the type of business property or the amount of exposure exceeds Euro 1 million.

The revaluations for property used as collateral to non-performing exposures, are mainly carried out using the following methodologies:

- Alignment with the property price statistical index of the Bank of Greece, for Residential Properties and for non-performing exposures up to Euro 300 thousand.
- Alignment with the property price statistical index of commercial real estate(CRE) that has been developed by Alpha Astika Akinita S.A. taking into account indices published by Bank of Greece, for certain categories of commercial property used as collateral for non-performing exposure of amount up to Euro 300 thousand
- Expert input by authorised engineers, after their visit to the property serving as collateral or by desktop valuation, provided that either the amount of non-performing exposure that cover the property under valuation exceeds the amount of Euro 300 thousand or in the cases where the indices do not cover the type of the property under revaluation.

The Group in the context of the credit control process performs on a regular basis and through proper sampling, audits for the procedures of implementation of the Group Loan Collateral Policy, audits (back-testing) for the verification of property valuations. Audits are based on indices and individual assessmentsin order to ensure that the proper collateral valuation is captured in the Group's Companies core systems according to the values mentioned in the relevant Committee approvals.

2.2. Pledges

Pledges provide seniority rights over liquidation proceeds from a movable third party asset.

Pledges can be registered on movable assets, securities, rights or claims that have not been excluded or banned from exchanges and which can be liquidated, including:

- Raw materials, products or commodities;
- Machinery (movable);
- Bill of Lading;
- Bill of exchange;
- Cheques;
- Securities;
- Deposit; and
- Any type of claim that can be pledged

Frequency of pledges revaluation

Depending on the right or the underlying asset on which a pledge is registered, the periodic revaluation varies from one month to one year.

3. Acceptable Value

During the approval process, the Group calculates the value of the collaterals received based on the potential proceeds that could arise if and when these are liquidated, in order to reduce potential risk. This estimation is referred to as the acceptable guaranteed value of the collaterals provided to the Group for the determination of which the quality of the assets as well as their market value are taken into account. In this way, the ratio of acceptable guaranteed values are determined for each type of collateral, those are expressed as a percentage of their market value, nominal or weighted value, depending on the type of collateral.

CREDIT RISK EARLY WARNING SYSTEM

In order to optimise the management of Lending and, in particular, limit the loans whose status changes from Performing Loans (PLs) to Non-Performing Loans (NPLs), the Group has developed the Credit Risk Early Warning System, which is defined as the aggregation of actions, processes and reports required to ensure the early identification of events, at borrower (corporate and individuals) and portfolio level, which may possibly lead to either an increase in NPLs due to the debtor's negligence or financial difficulty of a temporary or permanent nature or an increase in exposures with significant increase in credit risk, as well as the relevant actions that must be taken in order to manage the borrowers concerned.

A comprehensive and effective Credit Risk Early Warning System is composed of the following stages:

- Identification of early warning triggers
- Actions (timely and appropriate action taken)
- Monitoring the effectiveness of the procedure
- Quality control of the procedure's implementation

The perimeter to which the Credit Risk Early Warning System is implemented encompasses all performing exposures ,as well up to up to 10 days-past-due for Retail (beyond 11 days-past-due assignments for management) and 30 days delinquent loans (PLs) for Wholesale which have not been forborne.

Additionally to the early identification and management of borrowers or loan portfolio segments with signals of deterioration, the Group also monitors through the Early Warning System the loan portfolio, regardless of days past due, to ensure that the evolution and performance of the lending portfolio are in accordance with the Bank's and Group's Credit Risk Appetite.

The Group enhanced its Early Warning (EW) system to introduce Covid-19-specific events and expanded policies to ensure their applicability to the Covid-19 general moratoria perimeter. Specifically:

- Separate monitoring of the Covid-19 general payment moratoria perimeter for Retail and Wholesale portfolio, irrespective of EBA status.
- Enhancement of borrower communication through interviews in order to detect early signs of financial difficulty, provide adequate support measures to viable distressed borrowers and classify exposures appropriately. Customer outreach has prioritised high-risk segments and customers under Covid-19 moratoria ahead of expiration.
- Enhancement of borrower-level EW triggers, such as inclusion in Covid-19 moratoria perimeter, expiration of Covid-19 moratoria.
- Enhancement of portfolio level EW metrics, such as one-month to expiration moratoria population, actual vs. target portfolio under EAT/TEPIX II.

The effectiveness of the Credit Risk Early Warning System is being monitored on a regular basis by three "lines of defence":

- The first "line of defence" consists of controls within the Units of the Group that participate in the process.
- The second "line of defence", i.e. the Risk Management Unit, is responsible for ensuring on an ongoing basis and at least once per year, that the controls of the "first line of defence" are applied effectively, through the Credit Control Mechanism.
- The third "line of defence" is the internal audit function that carries out regular evaluations and proposes potential improvements.

ENVIRONMENTAL AND SOCIAL RISK

The assessment of the strict compliance with the principles of an environmentally and socially responsible financing towards legal entities has been integratedas well the approval process, according to the applicable Credit Policy.

The main objective is the identification, at the origination of a loan, of potential risk arising from the operations of obligors of the Group that may be connected with a damage to the environment or the society or with any direct threat of such a damage, having as a result a negative impact on the business operations and financial results of the Group.

In this context, a relevant model for the assessment of Environmental and Social Risk is used, which, based on the business sector of the company and in relation to the purpose of financing, classifies the borrowers in risk zones (High, Medium, Low) in order to make targeted on-site visits (due diligence), aiming at further evaluation the undertaken environmental and social responsibility risk by the competent Credit Committee.

CREDIT RISK CONCENTRATION MANAGEMENT

Concentration Risk is a specific form of credit risk and arises due to the low degree of diversification between counterparties, products or group of counterparties, sectors, geographic regions, or collaterals.

The Group monitors on a regular basis concentration risk at sector level and at borrower/group of borrowers level as well through detail reporting which informs senior management and Committees of the Board of Directors.

The Group categorizes the financed companies according to their NACE Rev.2 codes into Industry groups/Sectors, which are rated into risk zones. The Sectors ranking relative to their credit risk is carried out by an independent and certified company and is based on a predictive indicator that, focusing on future estimates rather than solely on past data, captures the risks and prospects of each sector. The Group determines the Credit Risk Appetite per sector and manages the concentration risk by monitoring the evolotion of its portfolio.

Additionally, the Group manages concentration risk at borrower/group of borrowers level by setting and monitoring compliance with limits set both by regulatory guidelines and by internal policies that have been developped.

Regulatory limits are mandated externally as following:

- Hard Regulatory Limit is determined to 25% of CET 1 and no exception is allowed.
- Soft Regulatory Limit is set to 10% of CET 1, serving as a threshold above which, cases should be reported to the European Central Bank.

Apart from the above limits set by external/ regulatory guidelines, the Bank has developed internal Policies that set limits aiming at managing and monitoring the concentration risk at borrower/group of borrowers level, taking into account the total credit limits as well as the credit rating of Borrowers. It is noted that, the relevant Policy is approved by the Board of Directors through the Risk Management Committee.

In line with the supervisory framework, the Group applies and complies with the regulatory directives regarding large exposures, while the capital requirements for single name and sector concentration risks are estimated in the context of Pillar 2 of Basel II.

DEFINITIONS

The following definitions are provided as guidance to tables that follow:

Public Sector

The Public Sector includes:

- The Greek Central Government;
- Local Authorities;
- Companies controlled and fully or partially owned by the State (excluding those engaged in commercial activity)

Past Due Exposures

An Exposure is past due if the counterparty's exposure is, materially, more than one day past due (sum of the principal, interests and charges/commissions due more than one day at an account level).

Non-Performing Exposures

An exposure is considered as Non-Performing when at least one of the following criteria apply at the time of the credit risk rating assessment:

- The exposure is more than 90 days past due (NPL): The amount due exceeds € 100 for Retail Exposures or € 500 for Wholesale Exposures and the amount due exceeds 1% of the total on balance sheet exposures. In particular, for overdraft facilities, an exposure is past due after having exceeded its approved limit.
- Legal actions have been undertaken by the Bank -Legal (NPL).
- The exposure is classified as Forborne Non-Performing Exposure (FNPL), as defined in the Implementing Regulation (EU) 227/9.1.2015.
- It is assessed as Unlikely to Pay (UTP).

When a Wholesale Banking borrower has an exposure that is more than 90 days past due and the amount of this exposure exceeds 20% of total exposures of the borrower, then all exposures of the borrower are considered as non-performing (Pulling Effect).

 The amounts are presented in thousands of Euro unless otherwise indicated

Performing Exposures

An exposure is considered as performing when the following criteria are met:

- The exposure is less than 90 days past due;
- No legal actions have been undertaken against the exposure;
- No unlikeliness to pay is reported on its credit obligation;
- The exposure is not classified as impaired;

  or

- The exposure is classified as forborne performing exposure, as defined in the aforementioned Implementing Regulation (EU) 2015/227 of 9 January 2015.

Unlikeliness to Pay

An exposure is flagged as 'Unlikely To Pay' (UTP) when it is less than 90 days past due and the Group assesses that the borrower is unlikely to fully meet his credit obligations without the liquidation of collateral, regardless the existence of any past due amount or the number of days past due, with the exception of collaterals that are part of the production and trade chain of the borrower (e.g. properties for Real Estate companies, corporate shares for Holding companies).

For Wholesale Banking, the procedure is the following:

(a) Identification of events which when occur lead to the transfer of the exposure to Non-Performing status without requiring an assessment by any Credit Committee (Hard UTP Triggers),

(b) Identification of triggers which when occur, lead to borrower's credit assessment by the relevant Wholesale Banking Credit Committee in order to determine whether borrower's exposures should be classified as Non-Performing or not (Soft UTP Triggers). This assessment takes place when reviewing borrower's credit limits depending on its credit ratings and in accordance with Wholesale Banking Credit Manual. If a borrower is flagged as UTP, then his credit risk rating should be D (Default) according to Bank's rating system or Default for Borrowers assessed using Slotting Models. If a borrower flagged as UTP belongs to a group of companies, then the group should also be assessed by the competent Credit Committee for the existence or not of UTP trigger.

The Group accounts for the Covid-19 impact on each borrower's ability to pay through consideration of deteriorating financials / income, market information (e.g. sector trends, loan exposures to other banks), early warning triggers, etc.

According to the EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis (EBA/GL/2020/15 and EBA/GL/2020/02), the identification of past due amounts is based on the revised payment schedule. Institutions shall perform a UTP assessment, prioritizing exposures with past due balances in relation to the revised payment schedule.

In this context, the UTP assessment for the Covid-19 perimeter is based on the following principles:

- If an exposure is already classified as NPE at the time of application of the Covid-19 measures (e.g. payment moratorium), such classification is retained.
- The application of Hard UTP criteria (automatic classification to NPE) and Soft UTP criteria (subject to assessment by the competent Credit Committee) is performed according to the existing procedures, where the assessment is based upon the revised payment schedule under the Covid-19 moratoria. The evaluation of the Soft UTP criteria is based on reasonable supportable information with focus on the post-moratoria period, considering all measures taken and the potential impact on borrowers' creditworthiness.
- The probation period of exposures classified as forborne before the pandemic that are part of the Covid-19 moratoria shall be adjusted based on the duration of the enacted measures. Also, for the Covid-19 moratoria perimeter, the probation period of exposures already classified as NPE before the pandemic freezes (i.e. no curing from Stage 3 to Stage 2) over the duration of the moratoria period.

For Wholesale Banking exposures the following Hard UTP Triggers exist:

- Denouncement of loan agreement

- Liquidation of collaterals and initiation of foreclosure measures by the Bank when the borrower does not have operational cash flows for the repayment of his debt obligations (excluding e.g. checks).
- Legal actions, sale or judicial sale in order to collect the claim (e.g. foreclosure instead of debt collection).
- Withdrawal of a license of particular importance in companies that require public authorisation to carry out their activities such as banks and insurance companies. The same applies for technical and construction companies, telecommunications companies, pharmaceutical, mining, transport, food, chemical, petroleum, recycle, media etc.
- Refinancing/Extensions of loans whose lifetime exceeds the economic lifetime of the funded investment.
- There are strong indications that the borrower is unable to meet his debt obligations (e.g. termination of business).
- Fraud cases
- Excess of the minimum acceptable Loan to Value (LTV), as depicted contractually, for loans collateralised with securities, e.g. bonds, shares etc (Margin Financing).
- Disappearance of an active market for the debtor's financial instruments, hold by the Group.
- Write-off because of default
- Debt Forgiveness with or without forbearance (conditional or not) at least for the first 12 months since the debt forgiveness.
- The credit institution or the leader of consortium starts bankruptcy/insolvency proceedings (application for insolvency).
- A credit event is declared under the International Swaps and Derivatives Association - ISDA).
- Out-of-court settlement/negotiation between Banks and Borrower for settlement / debt repayment of borrowers that are under bankruptcy proceedings (application for the bankruptcy).
- The borrower has requested to enter into bankruptcy or insolvency status (application for bankruptcy).
- A Bank has initiated bankruptcy or insolvency proceedings (application for bankruptcy).

Additionally, for Wholesale Banking exposures the following Soft UTP Triggers exist:

- Exposures that were modified by providing a 'balloon' payment while the initial terms of the loan agreement did not include this repayment method, as well as exposures that the initial terms of the loan agreement included the 'balloon' payment and were modified by including an increase of the "balloon" amount of and simultaneously by reducing the current installment.
- Multiple modifications in the same exposure.
- Deterioration of the leverage ratio (Debt to Equity).
- An exposure was purchased or sold with deep discount that reflects the low credit quality of the borrower.
- The debt service coverage ratio indicates that debt is not viable.
- 5 Years Credit Default Swaps (CDS) above 1.000 bps in the last 12 months.
- Loss of an important customer or lessee representing a significant percentage of entity's turnover or the total property income, respectively.
- A turnover decrease resulting in a significant reduction of cash flows.
- An affiliated customer, who represents a significant percentage of entity's turnover, has applied for bankruptcy.
- An external auditor report with restrictions or reservations that results to significant deterioration of key financial ratios of the borrower and to worsened estimated future cash flows of the borrower.
- It is expected that an exposure with repayment at maturity or a due installment cannot be refinanced under current market conditions.
- Disappearance of an active market for the debtor's financial instruments, not hold by the Bank.
- The borrower has breached the financial terms of the loan agreement.
- There is significant deterioration of the borrower's sector activity prospects.
- Adverse changes in the ownership structure or the management of the company or serious administrative problems.
- A third party (excluding Banks) has started bankruptcy or insolvency proceedings (application for Bankruptcy).

- Over due payments to Tax Authorities and Social Security Funds.

For Retail Banking, the procedure is the following:

(a) Identification of events which when occur lead to the transfer of the exposure to Non-Performing status without requiring an assessment by any Credit Committee (Hard UTP Triggers),

(b) Identification of triggers which when occur, lead to borrower's credit assessment by the relevant Retail Banking Credit Committee in order to determine whether borrower's exposures should be classified as Non-Performing or not (Soft UTP Triggers). This assessment takes place at the date of a forbearance request. If an exposure is flagged as UTP, then it should be classified as Non-Performing in the systems of the Group's companies.

Covid-19 modifications, either public or private moratoria, should not be considered as a UTP trigger event. However, where the moratorium applies to exposures that were already classified as defaulted at the moment of the application of the moratorium, this classification will be maintained.

For exposures of the Covid-19 moratoria perimeter both Hard UTP and Soft criteria are assessed according to the existing process.

For Retail Banking exposures the following Hard UTP Triggers exist:

- A trial date has been set for filling for Bankruptcy L.3869/2010
- Fraud has been confirmed at the expense of the Bank.
- The borrower has passed away.
- Multiple forbearances for the same exposure within a 12 months' time period.
- An out-of-court settlement / negotiation is underway between banks and borrower for settlement / repayment of debts of borrowers who are under bankruptcy proceedings (application for bankruptcy).
- Denouncement of loan agreement.
- Collaterals liquidation and foreclosure procedures have been initiated by the Bank in case the borrower cannot repay its debt obligation with the existing operating cash flows (excluding e.g. checks).
- Legal actions, sale or forced sale have been initiated in order to collect the debt (e.g. foreclosure measures against debt collection).
- Debt Forgiveness with or without forbearance (conditional or not), at least for the first 12 months since the debt forgiveness.

Additionally, for Retail Banking exposures the following Soft UTP Triggers exist:

- Multiple forbearances in the same exposure
- The borrower has other exposures in the Bank in default.
- The borrower is unemployed.
- The borrower has applied for bankruptcy or insolvency (application for bankruptcy).
- The borrower is the sole owner of a company with exposures in default and for which he has provided personal guarantees.

It is noted that the Group has adopted the new Definition of Default that applies from 1.1.2021, according to the EBA guideline (Article 178 of Regulation (EU) No 575/2013), adjusting its Policies and updating the Hard and Soft UTP triggers by implementing new ones (see par. "NEW Definition Of Default"), for both the Retail and Wholesale Banking Portfolios.

Credit Impaired Exposures

An exposure is considered as Credit Impaired when the criteria specified by the definition of Non-Performing Exposures are met.

Default Exposures

An exposure is considered as Default when the criteria specified by the definition of Non-Performing Exposures are met.

Allowance for expected credit losses

For credit risk reporting purposes, the allowance for expected credit losses of loans measured at amortised cost includes also the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) since the Group, from credit risk perspective, monitors the respective adjustment as part of the provisions. These loans were recognized either in the context of acquisition of specific loans or companies (i.e. Emporiki Bank and Citibank's retail operations in Greece), or as a result of significant modification of the terms of the previous loan that led to derecognition. Relevant adjustment has also been performed to the carrying amount of loans before allowance for expected credit losses.

Collateral value

The collateral value taken into account is the latest market value available. In the case of immovable properties, collateral value is considered the lower amount between the prenotation amount and the market value of the real estate. Value of guarantees only includes the amount that exceeds the value of tangible collaterals. All collateral values are capped at 100% of the outstanding amount of the loan.

EXPECTED CREDIT LOSS ESTIMATION METHODOLOGY

The Group, at each reporting date, recognizes a provision for expected credit losses on loans and advances to customers not measured at fair value through profit or loss as well as for letters of guarantee, letters of credit and undrawn loan commitments.

The Loan Impairment Methodology is common and applicable for both the Wholesale and Retail Banking Portfolios.

Default definition

The Group has adopted, as default definition for accounting purposes non-performing exposures (NPE), as defined in the Commission Implementing Regulation (EU) No 680/2014 of 16 April 2014.

The definition of Non-Performing Exposures is consistently used to develop models for estimating credit risk parameters (Probability of Default, Loss Given Default, Exposure at Default).

In addition, the definition of default is consistent with the one used for internal credit risk management purposes.

Portfolio Classification in Stages based on the Credit Risk (Staging)

Following an exposure's initial recognition, exposure is classified into stages based on its credit risk characteristics. The classification of loans in stages is based on the changes of the credit quality compared to its initial recognition.

Upon initial recognition of an exposure, the Group must determine whether this exposure is considered as credit impaired (Credit Impaired at Initial Recognition).

The POCI category (Purchased or Originated Credit Impaired, POCI) includes the following:

- Exposures that at the time of purchase (Purchased) meet the criteria of non-performing exposures.
- Exposures that as per accounting rules are derecognised and a new exposure is recognizsed and for which the following apply (Originated): if the exposure was classified as impaired (hence NPE) prior to derecognition, the new exposure will continue to maintain this classification and it will be classified as POCI.

For exposures not classified as POCI, the classification in stages is performed as follows:

- **The Stage 1** includes performing credit exposures that have no significant increase in credit risk since the initial recognition date. The expected credit losses calculated are based on the probability of default within the next 12 months and the assessment is carried out on a collective basis with the exception of borrowers assessed on an individual basis
- **The Stage 2** includes credit exposures with significant increase in credit risk since the initial recognition date but which are not non-performing. The expected credit losses calculated are lifetime credit losses and the assessment is carried out on a collective basis with the exception of borrowers assessed on an individual basis
- **The Stage 3** includes the non-performing / default exposures. The expected credit losses calculated are the lifetime losses and the assessment is performed on a collective or individual basis.

With regards to the POCI exposures, the expected credit losses calculated are the lifetime losses.

All possible movements between Stages of credit risk are presented below

- An exposure which has been classified in Stage 1 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the credit risk has not deteriorated and the exposure is still performing, or in Stage 2, if the exposure is still performing but the credit risk has deteriorated, or in Stage 3 if the exposure is non-performing/default.

- An exposure which has been classified in Stage 2 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the exposure is performing and does not meet any of the criteria of "Significant increase in credit risk" and in particular, for case of Forborne Performing exposure, if the exit criteria from the 2-years probation period are met. It could also remain in Stage 2, if the credit risk has not substantially changed, or be transferred to Stage 3, if the exposure is non-performing/default.
- An exposure which has been classified in Stage 3 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the exposure is performing and does not meet any of the criteria of "Significant increase in credit risk", or transferred in Stage 2, if it is no longer considered as non-performing, or remain in Stage 3, if it is still non-performing/default.

The Group does not make use of the exemption provided by the standard for low credit risk exposures.

For classification purposes, for wholesale banking revolving exposures, initial recognition date is the date of the most recent credit assessment reflecting the annual thorough credit risk review practice of the Bank.

Especially for exposures affected by Covid-19, post model adjustments (PMAs) could be used in order to reflect risks and other uncertainties that are not included in the underlying credit loss measurement methodology (ECL models), taking into consideration that:

- Probability of Default is the primary indicator in order to determine deterioration since initial recognition.
- PD Models are not designed to cater for the economic circumstances that currently exist.

Significant Increase in Credit Risk

For the timely identification of significant increase in credit risk for an Exposure after the initial recognition (SICR) leading to the calculation of lifetime credit lossed of the exposure instead of twelve months credit losses, the risk of default at the reference date is compared to the risk of default at the initial recognition date for all Performing Exposures, including those with no days past due (Delinquencies).

The assessment to determine whether an exposure shows significant increase in credit risk or not is based on the following three types of Indicators:

- **Quantitative Indicators:** They refer to the use of quantitative information and specifically to the comparison between the probability of default (PD) at the reference date and the probability of default at the initial recognition date. The assessment of significant increase in credit risk takes into account the absolute increase of PD between the reporting and the initial recognition date (which can range between 3 and 5 percentage point depending on the asset class of the loans) as well as the relative increase of PD between the reporting and the initial recognition date (doubling or tripling of PD, depending on asset class of the loan). For Wholesale exposures obligor rating is also taken into consideration. Absolute and relative thresholds determining the significant increase between reporting and initial recognition date are validated on an annual basis, in order to ensure a robust statistical discriminatory power.
- **Qualitative Indicators**: They refer to use of qualitative information which is not necessarily depicted in the probability of default, such as the assessment of an exposure as performing forborne ("FPL" within 2 years probation period according to EBA ITS) or as exposure with Financial Difficulty. Additional qualitative indicators for the Wholesale Banking portfolios and the Retail Banking portfolios are included in Early Warning Policy. According to the abovementioned policy and as per the assessment performed, an exposure may be considered to show significant increase in credit risk. Especially for Specialized Lending portfolios additional qualitative indicators are identified).
- **Backstop Indicators:** In addition to the above, and with a view to addressing cases where there is no evidence of significant credit risk deterioration based on the quantitative and qualitative indicators, exposures over 30 days past due are considered by definition to show a significant increase in credit risk.

Allowance for expected credit losses estimation

Exposures assessed on individual basis (Individual Assessment)

The Expected Credit Losses calculation is carried out either on an individual basis, taking into account the significance of the exposure, the fact that certain exposures do not share common credit risk characteristics and the existence or not of sufficient historical data, or on a collective basis.

For companies where the corporate guarantee from the parent company represent 100% of the exposure of the companies, or for other important interdependencies between group of companies, the assessment may be performed at a group level.

Regarding the exposures to companies, with at least one non-performing exposure, they are individually assessed if they exceed the limits set by each company of the Group (following the permission/approval of the Bank). All other exposures to Companies are collectively assessed.

Specifically for the Bank, Exposures to Companies assessed on an individual basis are the following:

- Borrowers with at least one Non-Performing Exposure whose Customer overall credit Limit in the Bank exceeds the amount of Euro 1.5 million.
- Borrowers of the Shipping Division and the Structured Finance Division regardless the overall credit limit with at least one Non-Performing Exposure.
- Exposures that do not share common risk characteristics or for which no relevant historical data that enables a collective analysis is available.

Any remaining Exposure to Companies is assessed collectively.

Non-performing Exposures to Individuals are individually assessed, if the exposures of retail banking customers exceed the defined limits according to the specifications of each Group company. All other exposures to individuals are collectively assessed.

Specifically for the Bank, Exposures to Individuals are assessed individually, if they are Non-Performing Exposures (NPE), and if the following threshold, per portfolio, applies:

- Consumer Loans: Accounts of Consumer Credit Borrowers with total on balance exposures over € 500 thousand.
- Mortgage Loans: Accounts of Mortgage Credit Borrowers with on balance exposures over € 2 million.

Any remaining exposure to Individuals is assessed collectively.

Exposures assessed on collective basis (Collective Assessment)

Collective Assessment applies to credit exposures which are not assessed individually, i.e. exposures classified in Stage 1 and Stage 2 as well as non-performing exposures that do not meet the above criteria for individual assessment, after having been categorised based on similar credit risk characteristics by portfolio.

For the classification of credit facilities into groups with similar credit risk characteristics, the followings are considered:

- Staging according to Credit Risk
- Type of Product
- Days Past Due
- Time in default
- Indication of unlikeliness to pay
- Modification of contractual terms for borrowers showing financial difficulty (Forbearance Measures)
- Modification Type
- Existence of Collateral taking into account the type and Loan to Value ratio
- Existence of Greek State Guarantee
- Partial Write-Off
- Credit Risk Rating
- Activity Sector
- Asset held for Sale

The groupings are reviewed on a regular basis to ensure that each group is comprised of homogenous exposures.

Calculation of allowance for expected credit losses

Allowance for expected credit losses is updated at each reporting date to reflect the changes in the credit risk since initial recognition and thus provide timely information on evolution of expected credit losses.

The measurement of Expected Credit Losses is performed as follows:

- For financial assets, a credit loss is the present value of the difference between:
  (a) the contractual cash flows and
  (b) the cash flows that the Group expects to receive
- For undrawn loan commitments, Expected Credit Losses are the present value of the difference between:
  (a) the contractual cash flows that will be due if the loan commitment is drawn down; and
  (b) the cash flows that the Group expects to receive if this amount is disbursed.
- For letters of guarantee and letters of credit, the loss is equal to the expected payments to reimburse the holder for a credit loss that it incurs less any amounts that the Group expects to receive from the holder.

Incorporation of forward-looking information

The Group calculates allowance for expected credit losses based on the weighted probability of three alternative scenarios. More specifically, the Economic Research Division produces forecasts for the possible evolution of macroeconomic variables that affect the level of allowance for expected credit losses of loan portfolios under a baseline and under two alternative macroeconomic scenarios (an upside and a downside one) and also produces the cumulative probabilities associated with these scenarios.

The macroeconomic variables affecting the level of allowance for expected credit losses are the Gross Domestic product (GDP), the unemployment rate and forward looking prices of residential and commercial real estates

Specifically for the Bank, the yearly average for the period 2021-2024 of macroeconomic variables affecting both the Probability of Default and the expected Loss Given Default for the calculation of allowance for expected credit losses as at 31.12.2020 are the following:

	2021 – 2024		
	Downside Scenario	**Baseline Scenario**	**Upside Scenario**
Real GDP growth	1,7%	3,6%	5,6%
Unemployment rate	16,1%	14,3%	12,4%
Change in Residential Real Estate (RRE)	1,0%	3,2%	5,4%
Change in Commercial Real Estate (CRE)	2,0%	3,8%	5,7%

Respectively, the yearly average for the period 2020-2023 of macroeconomic variables affecting the calculation of allowance for expected credit losses as at 31.12.2019 are the following.

	2020 - 2023		
	Downside Scenario	**Baseline Scenario**	**Upside Scenario**
Real GDP growth	(0,2%)	1,6%	3,4%
Unemployment rate	16,1%	13,9%	11,8%
Change in Residential Real Estate prices (RRE)	0,7%	3,4%	6,3%
Change in Commercial Real Estate prices (CRE)	2,0%	3,6%	5,3%

The production of baseline scenario, supported by a consistent economic description, constitutes the most likely scenario according to the current economic conditions and the Group's basic assessment of the course of the economy.

The cumulative probabilities of the macroeconomic scenarios for the Greek economy indicate that the economy performs better or worse than forecasts of the baseline scenario and the alternative scenarios, i.e. the upside and downside scenario. For each one of the alternative scenarios, the allowance for expected credit losses is calculated and weighted against the probability of each scenario in order to calculate the weighted expected credit loss

The cumulative probability assigned to the baseline scenario remained 60%, while cumulative probability assigned to the downside and upside scenario remained 20% for each of the scenario.

250 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

If the assigned cumulative probability of the downside scenario was increased from 20% to 40%, Expected Credit Losses would increase by € 78,2 million as at 31.12.2020 (31.12.2019: € 84,0 million). If the assigned cumulative probability of the upside scenario was increased from 20% to 40%, Expected Credit Losses would decreaseby € 78,4 million as at 31.12.2020 (31.12.2019: € 83,9 million).

(In millions of Euro)

	Downside Scenario		Upside Scenario	
	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Retail Exposures	**56**	**60**	**(56)**	**(60)**
Stage 1	2	1	(2)	(1)
Stage 2	18	14	(18)	(14)
Stage 3	36	44	(36)	(44)
Wholesale Exposures	**22**	**24**	**(22)**	**(24)**
Stage 1	3	7	(3)	(7)
Stage 2	3	3	(3)	(3)
Stage 3	16	14	(16)	(14)
Total	**78**	**84**	**(78)**	**(84)**

Credit risk parameters

Calculation of Expected Credit Loss is based on the following credit risk parameters which are developed, through internal statistical models based on historical data:

- **Probability of Default (PD):**

  Wholesale portfolio

  It is an estimate of the probability of a debtor to default over a specific time horizon.

  For assessing the probability of default, the credit risk rating models assess a series of parameters that can be grouped as follows:

  - Financial Analysis: The Borrower's Financial Capacity (Liquidity Indicators, Debt to Revenue etc.)
  - Competitor's analysis: the borrower's comparative position in the market in which operates, mainly in relation to its competitors (mainly applicable to debtors of Wholesale Banking)
  - Current and historical debtor's behavioural data either towards the Bank or towards third parties (delinquencies, repayment behavior, etc.), and
  - Qualitative characteristics of the debtor (strong and sound management, management succession, appropriate facilities and equipment, etc.).

  Regarding Specialized Lending the Probability to Default is estimated on facility level based on dedicated expert based models.

  Retail portfolio

  It is an estimate of the probability of an account to default over a specific time horizon.

  For assessing the probability of default, credit risk behavioural models have been developed which assess a series of parameters that can be grouped as follows:

  - Qualitative data: Activity Sector, Number of Employees, Company Type
  - Loan characteristics: product applied for, loan term, loan amount, or financing purpose;
  - Behavioral data: payments during latest period of time, delinquencies (i.e. overdue amount, bucket etc), exposure, transaction type, credit limit usage.

  Credit Risk models / Ratings constitute the main input in order to determine the probability of default. The Group uses statistical models in order to analyze the collected data and make estimates of the remaining probability of default over the life of the exposures and how they will evolve over time based, among other things, on macroeconomic variables.

- **Exposure at default (EAD):** Exposure at Default is an estimate of the amount of the exposure at the time of the default taking into account: (a) expected changes in the exposure after the reporting date, including principal and interest payments; (b) the expected use of credit limits and (c) accrued interest. The approved credit limits that have not been fully disbursed represent a potential credit exposure and are converted into a credit exposure equal to the approved undrawn loan commitment multiplied by a Credit Conversion Factor (CCF). The Credit Conversion factor of credit exposure is calculated based on statistical models. The maximum period for which credit losses are calculated is the remaining contractual maturity of a financial instrument unless the Group has the legal right to recall the financial instrument earlier. In particular, for Credit Cards and revolving exposures to individuals, the maximum period is set at three years, while for revolving loans to Small Businesses, the corresponding maturity is set at four years. Regarding Wholesale Banking revolving exposures, the period is set to one year, given the thorough credit review performed at least once a year. If the residual maturity of the revolving exposures classified in Stage 2 was increased by one year, Expected Credit Losses would increase by € 5,2 million as at 31.12.2020.

  The Group uses EAD models that reflect the characteristics of the portfolios.

- **Loss given default (LGD):** Loss given default is an estimate of the loss that will occur if the default occurs at a given time. It is based on the difference between the contractual cash flows due and those expected to be received by the Group, including the liquidation of collaterals, the probability of cure and the probability to modify which are both based on historical data.

  For unsecured loans, the estimated Expected Credit Loss at the time of the default takes into account expected recovery rates which vary throughout the recovery period as well as the probability of curing and the probability to modify.

  Expected recoveries from tangible collaterals are based on the following inputs: the most recent (updated within the year) market value of the collateral, the time required for the liquidation or sale of the collateral (ranging between 1 to 4 years depending on the legal action status of the loan), the expected market value at liquidation /sale date based on the evolution of RRE/ CRE indices for the next 4 years, the expected recoveries through foreclosure process or sale as derived from historical data obtained for foreclosures and sales of collateral. Last, the recovery rate is adjusted to reflect value of preferential claims. Expected cash flows are discounted using the original effective interest rate.

  Last, it is noted that for exposures secured with tangible collaterals, the LGD may vary following changes of macroeconomic scenarios.

- **Management overlays:** Management overlays refer to temporary adjustments applied to allowance for expected credit losses, in the context of the preparation of financial statements in order to incorporate recent developments and information. The Group implements a robust governance framework to review and support the management, calculation and application of these adjustments. The Group's governance framework requires such adjustments to be well documented, controlled and appropriately approved. For 2020, management overlays incorporated the estimated impact from loan portfolio sales scenarios. For the calculation of the impact, the Group took into account any factors that may delay the realization of the sales and the progress of the conditions for the completion of the sales.

Undrawn loan commitments

According to IFRS 9, these contracts fall within the scope for expected credit losses recognition.

In estimating the allowance for expected credit losses over the life of an undrawn loan commitment, the Group assesses the expected part of the loan commitment that will be used throughout its expected life.

Inherent Model Risk

The Group recognizing the inherent model risk, derived from the model complexity and aggregated model risk, has adopted a Model Risk management framework which includes the principles of credit risk models development policy and risk models validation framework. In this context, the independent Risk Models Validation division validates all credit risk models used for the calculation of IFRS 9 allowance for expected credit losses.

Governance

The Credit Risk Committee is responsible for approving the Expected Credit Losses as well as the methodologies developed by the Group for calculating the expected credit loss (ECL Methodology) for loan portfolio.

The Board of Directors approves the Group Loan Impairment Policy through the Risk Management Committee.

EFFECT FROM THE COVID-19 PANDEMIC

Perimeter affected by the Covid-19 pandemic

The Group, in order to support its customers who are affected or expected to be affected by the crisis due to the Covid-19 pandemic, has taken, and will continue to take, a series of measures. Support is provided to affected businesses and individuals, facing temporary payment difficulties and liquidity shortages, through both legislative and non-legislative measures.

These measures concern either new loans, in the context of strengthening the liquidity of small, medium and large businesses, as well as the self-employed, or modifications in the repayment schedules of existing loan of both businesses and individuals.

Moreover, the Bank actively participates in every effort planned and coordinated by the Greek Government, either through the competent Ministries or through the Hellenic Development Bank and its Funds (i.e. TEPIX) as well as other European institutions to support the Greek economy (, European Investment Fund, COSME etc.).

The modifications granted to existing loans were treated by the Bank in line with the Guidelines issued by the European Banking Authority (hereinafter "EBA") "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/02, EBA/GL/2020/08 and EBA/GL/2020/15) that aim to provide clarity to the EU banking sector on how to handle in a consistent manner, aspects related to (i) the classification of loans in default and (ii) the identification of forborne exposures.

In this respect, provided that those measures are not borrower-specific, the payment moratorium is fixed for every borrower irrespective of the borrowers' specific financial circumstances and the Net Present Value ("NPV") loss is immaterial, modifications in payment schedules are not automatically classified as Distressed Restructuring (Forbearance) both under IFRS 9 and the definition of default.

In accordance with the Bank's accounting policy, these modifications are not considered significant and therefore no derecognition occurs.

The measure of temporary payment holidays is offered to customers operating or employed in sectors affected by the Covid-19 pandemic, which is assessed by the Bank, through the submission of a relevant request from the customer.

It is noted that this measure, based on relevant guidelines by the EBA as amended on 2.12.2020 (EBA/GL/2020/15), is applicable until 31.3.2021, meaning that approvals of customer requests for payment holidays are accepted until that date and for an overall length of the payment holiday up to 9 months.

Characteristics of private and public moratoria

In order to support affected corporates and individuals, both legislative and non-legislative measures / actions have been undertaken by the Government and the Bank, according to the above guidelines by EBA.

The **supportive measures provided by the Bank ("Covid measures")** were the following:

For **Medium and Large** corporates operating in sectors or areas affected by the Covid-19 crisis and provided that they were performing (less than 90 days past due) as at February 28, 2020:

- Payment holiday for capital installments due from 1.3.2020 to 31.12.2020 to the end of the loan or distribution among the remaining installments.
- Installments that include interest and capital due from 1.3.2020 to 31.12.2020, could be distributed equally among the remaining installments of the loan.
- Extension of existing payment moratoria after 31.12.2020 and up to an overall length of 9 months, applicable before 31.3.2021.
- Capitalization of interest accrued until 31.12.2020 or another date as decided.
- Extension of the obligation to recycle revolving loans until 31.12.2020.
- Possibility of replacing post-dated checks, received as collateral, with other checks from the same issuer of a later date, after an updated creditworthiness control.

- For businesses with no payment moratoria during 2020, that were performing (less than 90 days past due) as at 30.11.2020, new payment holiday limited to a total period of 9 months, may be offered, applicable before 31.3.2021.

For **Small businesses** and self-employed operating in sectors or areas affected by the Covid-19 crisis and provided that they were performing (less than 90 days past due) as at February 28, 2020:

- Payment holiday for capital installments due from 1.3.2020 to 31.12.2020 at the end of the loan.
- For borrowers with fixed term loans possibility to capitalized installments due until 31.12.2020 or another date as decided
- For businesses with no payment moratoria during 2020, that were performing (less than 90 days past due) as at 30.11.2020, new payment holiday limited to a total period of 9 months, may be offered, applicable before 31.03.2021. Extension of the obligation to recycle revolving loans until 31.12.2020
- Possibility of replacing post-dated checks received as collateral, with other checks from the same issuer of a later date, after an updated creditworthiness control.

For **individuals** that faced limitation or decrease in their income because they belong to sectors that are affected, and which have fixed term loans (consumer and mortgage), credit cards and open personal loans with less than 90 days past due as at February 28, 2020:

- Payment holiday of the installments due or the minimum amount due for cards and open personal loans until 31.12.2020.
- For individuals with no payment moratoria during 2020, that were performing (less than 90 days past due) as at 30.11.2020, new payment holiday limited to a total period of 9 months, may be offered, applicable before 31.3.2021. Capitalization of the contractual interest, during the suspension period, as well as any expenses (e.g. insurance premiums), in the balance of the loan on due dates.

All loan modifications are flagged in the Bank's systems, so that the Bank is able to monitor them.

The table below presents the loans for which the Group proceeded within 2020 in the above mentioned supportive measures:

	Loans measured at amortised cost			Loans measured at fair value through profit or loss (FVPL)	Total
	Stage 1	Stage 2	Stage 3		
RETAIL LENDING	710.524	3.206.435	2.378.885		6.295.844
CORPORATE LENDING	1.534.347	916.740	609.130	55.209	3.115.426
TOTAL LOANS	2.244.871	4.123.175	2.988.015	55.209	9.411.270

There are no active private moratoria as of 31.12.2020.

As at 31.12.2020, the active implementations of the Group that are included in the perimeter of loans with the Greek State guarantee (which amounts to 80%) are presented below:

	Loans measured at amortised cost			Total
	Stage 1	Stage 2	Stage 3	
SMALL BUSINESS LOANS LENDING	77.002	1.699		78.701
CORPORATE LENDING	892.842	59.708	9.444	961.994
TOTAL LOANS	969.844	61.407	9.444	1.040.695

Amendments in the loan impairment policy due to Covid-19 pandemic

The Group Loan Impairment Policy has been amended, in line with the EBA Guidelines "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/08), to incorporate the distinct treatment of the exposures which are affected by the Covid-19 pandemic. The Group, for these exposures, has included in its Policy the criteria for the the Forbearance Classification, the Unlikeliness-to-pay (UTP) assessment, the identification of Default and the Significant Increase in Credit Risk treatment.

254 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

According to the EBA Guidelines, the public and private moratoria, as a response to Covid-19 pandemic to the extent they are not borrower specific but rather addressed to broad ranges of product classes or customers, should not be automatically classified as forbearance measures, or lead to default status. This type of restructuring should not be automatically considered as a distressed restructuring, on the contrary it has to be considered a suitable measure to give relief to borrowers, which are temporarily not able to serve their loan obligations due to Covid-19 disruptions.

Adjustments in the calculation of allowance for expected credit losses

In order the Group to cope with obligors who face temporary liquidity problems due to the Covid-19 crisis, established the following adjustments to the calculation of expected credit losses.

More specifically, in order to adress the delays anticipated in the liquidation of the collaterals, the expected time to sale increased by one year compared to 31.12.2019, both for the collectively assessed exposures and for the individually assessed exposures for which the recovery is not based on the operating cash flows (gone concern).

Additionally, the Group has enhanced its credit rating assessment and risk parameter quantification processes to ensure they remain appropriate in the Covid-19 environment. More specifically, the Group conducted an extensive sectoral analysis in order to inform its Covid-19-adjusted segmentation framework. The segmentation was used to identify high-risk segments for prioritisation in terms of the customer outreach. The feedback from the borrower campaign fed the Bank's:

- Rating assessments: Rating downgrades informed the SICR triggers and Stage 2 classification as well as the frequency of review based on the Risk Zone.
- Mitigating actions: Following customer feedback, the Group offered appropriate credit mitigation strategies to viable borrowers, where necessary. In turn, this informed the Forbearance classification and eventually Stage 2 migration.

Moreover, necessary adjustments were applied to the results of the models used to calculate the expected credit loss. These adjustments reflect the risks and other uncertainties that are not included in the underlying credit risk models. The adjustments to the results of the existing models are approved by the credit risk committee. More specifically:

- Performing retail exposures under payment moratoria that are classified in high and satisfactory risk zones (average PD 6.9%), transferred from Stage 1 to Stage 2 and Lifetime ECL is calculated for the remaining maturity of the exposures as a result of respective qualitative evaluation for possible increase of credit risk.
- Temporary short-term modifications granted to Retail exposures that are no longer under payment moratoria and according to individual evaluation that has been performed are viable customers who are facing temporary liquidity problems with no indication of permanent financial difficulty, were classified in Stage 2 and Lifetime ECL is calculated for the remaining maturity of the exposures.
- For all loans that were already under modification terms and for which a Covid modification has been provided, based on the above mentioned measures that the Group applied, the cure rate remained unchanged for the period of the Covid modification.
- In order to assess the impact of the pandemic on the cash flows of the borrowers for which the exposures are assessed on an individual basis for the estimation of expected credit losses, adjustments were made to the estimated credit losses depending on the sector of activity of the borrower.

For the purposes of determining the expected credit losses, the Group calculates the expected cash flows based on the weighted probability of three scenarios. More specifically, the the Group produces forecasts for the possible evolution of macroeconomic variables that affect the level of expected credit losses of loan portfolios under a baseline and under two alternative macroeconomic scenarios (an upside and a downside) and produces the cumulative probabilities associated with these scenarios.

The macroeconomic variables affecting the level of expected credit losses are the Gross Domestic product (hereinafter "GDP"), the unemployment rate and forward-looking prices of residential and commercial real estates.

The Bank adjusted the existing scenarios during 1.1.2020, which at 31.12.2020 predict growth rates for 2020, ranging from -9% for the unfinished V- shaped (upside scenario) with a gradual return to the pre-Covid-19 uptrend, up to -11% for the quasi (imperfect) Nike Swoosh shape (downside scenario) with a significant stagnation in the domestic economic activity in the medium term.

Regarding Alpha Bank Cyprus, the growth rate for 2020 ranges from -5.5% (upside scenario) to -6.7% (downside scenario), while for Alpha Bank Romania it ranges from -3.8% (upside scenario) to -6.8% (downside scenario).

This approach is due to the current situation, where increased uncertainty surrounds the domestic economic outlook. The negative impact of the Covid-19 pandemic on domestic growth is expected to be determined, inter alia, by:

(a) the intensity and duration of the pandemic;

(b) the scale and effectiveness of containment measures, combined with the fiscal and monetary policy measures;

(c) the effect on spending and personal consumption due to lockdown and social distancing and

(d) the extent of uncertainty in the supply chain.

The main features of these scenarios can be described as follows:

Baseline Scenario

The baseline scenario predicts a weaker recovery in comparison to the initial shock. This negative impact on domestic economic activity is estimated to come from:

- A demand-side shock that affected both exports of goods and services (Transport, shipping and tourism), given that the European Union is the most important export market for Greece, as well as the domestic consumption and investments. However, the decline in imports due to weakening domestic demand and falling oil prices has partially mitigated the negative effects on GDP growth in 2020. High uncertainty is expected to weigh on investment; however, this impact may be relatively limited given the current low share of investment in GDP.
- A supply-side shock, related to the lockdown measures in several sectors of the economy.
- Adverse, albeit temporary, confidence effects weighing on aggregate demand.

The broad-based fiscal response supports aggregate domestic demand and weakens the negative effects on the economic activity and confidence, while setting the stage for a swift, although partial, recovery in the medium-term. The dynamics of the baseline scenario could be divided into two parts:

- Firstly, the positive base effects in the Hotel Industry, the food services and the retail trade from the second quarter of the year onwards. A crucial parameter for their final effect is the speed and effectiveness of vaccination programs - not only in Greece, but especially in the tourists' countries, which will release travel from social distancing and travel restrictions.
- Secondly, the government's reform program combined with funding from the Recovery and Resilience Facility (RRF) mechanism can be a strong base for high growth rates. Greece is expected to receive from the activation of the EU-27 Recovery Plan ("Next Generation EU", NGEU) grants that correspond to 10.3% of the expected GDP for 2020 for the next years, resulting in the third highest ranking among EU-27 countries.

Regarding the real estate prices, their growth rate has been slowed down compared to the initial forecasts (December 2019), both for 2020 and cumulative for the period 2020-22, due to the worsening of the economic activity due to Covid-19 pandemic. The impact is reflected in parallel to the economic variables of unemployment and GDP. Besides, GDP's growth rate is included within the main determining factor of the real estate properties prices.

The aforementioned mild deceleration of Bank's assessment in the real estate properties prices for 2020 and afterwards(eg from 5.3% to 3.9% on an annual basis for the current year) is linked with the enrichment of our analysis with the historical data of the first quarter (+ 6.9% on an annual basis) and the second quarter (+ 4.1% on an annual basis) of the BoG index, a development that shows an inelasticity of residential real estate prices against GDP growth in the baseline recession.

Upside Scenario

In the upside scenario the pathway of the pandemic is shorter than initially expected. The economy is assumed to recover and return soon to its upward path to normality, also supported by the broad - based stimulus from fiscal and monetary policy responses.

The real estate prices maintain their pre-Covid-19 dynamic assisted also by other structural factors apart from the rise of construction activity.

Downside Scenario

The downside scenario features a negative imperfect Nike Swoosh shaped shock on the domestic economic activity (i.e.

partial recovery of losses in GDP terms in a 3-year period), envisaging a steeper drop in 2020 and muted recovery dynamics over the medium-term. The scenario reflects higher intensity and persistence of the pandemic, interrelated with some combination of potential downside risks, with broader negative spillover effects across the economy. In this scenario real estate prices losing the increasing dynamic of prior years without, however, these changes receiving a negative sign.

The probabilistic weighting assigned to the baseline scenario remained at 60%, while the probabilistic weighting for the downside and upside scenario is 20% for each of the scenarios.

Since the models are forward-looking and in order to ensure robust model performance and avoid pro-cyclicality and cliff effects, in the case of GDP the Group has utilized the macroeconomic forecasts over the period 2020-2021 which are considered to be more representative.

In total, the expected credit loss due to the above adjustments in Group's models results, incorporate at 31.12.2020 € 283 mn impact due to Covid-19.

(In millions of Euro)

	Retail Lending	Corporate Lending	Total
Performing Exposures	46	94	140
Non-Performing Exposures	60	83	143
Total	**106**	**177**	**283**

NEW DEFINITION OF DEFAULT

In the context of alignment with the regulatory guidelines, the Group adopts the new Definition of Default that applies from 1 January 2021.

The main changes introduced by the new Definition of Default are presented as follows:

- Additional "Unlikeliness To Pay" trigger events such as Diminished Financial obligations (NPV Loss), Sale of Credit Obligations, Default to Subsidiaries.
- Change on the way of counting of Days Past Due meaning that hereafter the counting will be based on the existence of concecutive days of material past due.
- An additional three-month probation period from the moment the obligor is no longer materially past due and no indication of Unlikeliness To Pay occurs.

The Group has decided since 2018 to align Default, NPE and IFRS 9 "Credit Impaired" perimeter. Additionally, the adoption of the new Definition of Default as at the time of the first implementation, namely at 1.1.2021, did not induce any impact on the Bank's financial figures.

Definition

A Default event is considered to have occurred, regarding a particular Borrower, when at least one of the following criteria has taken place:

1. Past Due Criterion

The Borrower is past due more than 90 consecutive days on any material amount of the credit obligation(s).

Particularly, for Alpha Bank Greece, exposures at Alpha Leasing and ABC Factors are taken into consideration at the calculation of the Past Due Criterion.

2. Unlikeliness to Pay (UTP) Criterion

The Group considers that the Borrower is unlikely to pay its credit obligations without recourse by the Bank to actions such as realizing security.

Additionally the Default classification and the EBA classification should be aligned and thus any FNPL or NPL exposure is considered as Defaulted.

For Retail exposures, the above specified definition of Default is applied at the level of an individual credit facility.

For Non-Retail exposures, the definition of Default is applied at the obligor level meaning that when at least one of the above specified criteria are met, the Obligor is considered as Defaulted. The Past Due Criterion is applied both at facility and at obligor level for exposures classified as Non-Retail, in order to be able to identify exposures for which the Past Due Criterion is satisfied at facility level, but not at obligor level.

FORBEARANCE

Maintaining a healthy loan portfolio depends on the constant monitoring and assessment of the borrowers in order to allow early detection of future liquidity problems, which could affect the normal repayment of their obligations to the Group.

The credit tools which are normally used by the Group for managing the liquidity problems that borrowers are facing for repaying their obligations are the restructuring of debt through the renegotiation of the original terms and conditions of the loan agreement they have entered into.

The Executive Committee "Act 175/2/29.7.2020 of the Bank of Greece, has determined the supervisory framework for the management of loans in arrears and non-performing loans, over and above the already applicable requirements of Law 4261/2014, the CRR 575/2013, and delegated the decision authority to the Bank of Greece.

Furthermore, in the context of the Commission Implementing Regulation (EU) 2015/227 of the European Commision dated January 9, 2015 and the executive technical standards of the European Banking Authority, the Group assumes the resulting regulatory obligations for forborne exposures.

Forbearance measures should be applied on the basis of the risk, cooperativeness and viability of each debtor and consist of concessions assessed to be robust and sustainable, through the renegotiation of the initial terms and conditions of the debt contract duly taking into account the causes of the debtor's financial difficulties.

Forbearance measures may be applied a) on the basis of a customer's request, b) in accordance with the Code of Conduct under Law 4224/2013, as currently is in force, which is a State initiative under the supervision of the Bank of Greece. Apart from the forbearance measures applied to existing Retail lending exposures, which are initiated by the Group in accordance with the directives of the Executive Committee Acts of the Bank of Greece (No. 175/2/29.7.2020) and Arrears Resolution Process (ARP) of the Code of Conduct under L.4224/2013 as currently is in force, there are restructuring solutions according to the Legislative Framework.

The existence of more favorable terms for renegotiating and modifying the terms and conditions of the bilateral arrangement between the Group and the debtor (concession), who is facing or is about to face difficulties in meeting his financial commitments ("financial difficulty"), are defined with respect to:

- Respective terms existing and applied to customers with no financial difficulty; and
- Corresponding terms existing in market for debtors with similar credit rik profile.

Financial Difficulty is defined as the situation where the debtor is unable to comply or is about to face difficulties in servicing his credit obligations as per the current loan repayment schedule due to the worsening of his financial status.

According to the EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis (EBA/GL/2020/15 and EBA/GL/2020/02), exposures that have received payment holidays as a result of Covid-19 are not subject to automatic classification to forborne to the extent that the measures provided are applied to a wide range of product and/or customer categories (as opposed to being tailored to the specific situations of individual debtors).

The aforementioned treatment of forbearance is – in consistence with the regulatory guidance – applied only when the following conditions are met:

- The moratoria are general, i.e. they are not creditor-specific, as the duration of the conditions are standardized for all debtors. That said, specific products may be provided to broader borrower categories. Similar payment relief measures are taken by other Greek banks.
- The measures provide solely for amendments to the payment schedule over a pre-determined, limited period of time, and do not alter other loan terms and conditions, such as interest rates.
- There is no material loss on the exposure in Net Present Value terms
- The moratoria do not apply to new loan contracts granted after the date the moratoria were announced.

- The moratoria were launched in response to the Covid-19 pandemic apply until 31 March 2021, and their total duration do not exceed 9 months.
- The creditworthiness of the borrower is not estimated to be significantly affected by the Covid-19 crisis in long term.

MONITORING OF FORBORNE EXPOSURES

Following the Executive Committee Act 42/30.5.2014, ("Act 42") as subsequently amended by the Act 47/9.2.2015 ("Act 47") and by the Act 102/30.8.2016 ("Act 102") 134/5.3.2018 and 136/2.4.2018 of the Bank of Greece, the Group has undertaken a series of actions to ensure adherence to the supervisory obligations and requirements arising from the above Acts. These changes cover the following distinct sections:

- Adaptation of Information Systems of the Group;
- Amendments of the existing processes, such as the customization of new types of forborne exposures according to what is provided in Act 42/47/102/134/136.
- Creation of data structures (Data Marts) aiming at:
  - Automation of the processes related to the production of both internal (Risk Management) and external (Supervisory) reports;
  - Perform analyses on the portfolio of the Group; and
  - Production of Management Information Reporting (MIS)

WRITE-OFFS AND WRITE-DOWNS OF BAD DEBTS

Bad Debt Write-off is defined as the reduction of the gross carrying amount of a financial asset, when there is no reasonable expectation of recovery. The write-off refers to the accounting write-off of a debt or a portion of it, i.e. the removal of the financial asset or part of it from the balance sheet, which does not necessarily entail the waiver of the legal right to recover the debt. In the event that the Group decides to waive its legal right to recover the debt, this is called **Debt Forgiveness** and this waiver may include either on or off-balance sheet items as well.

Bad Debt Write-down is defined as the definitive reduction of a debt or portion of it, as a result of a legally binding decision or agreement (court judgment, contractual agreement etc.), which is not further claimable. It is noted that this category encompasses **Definitive write-downs** which are unconditional and **Conditional Write-Downs** (Contingent Write-Down) subject to the achievement by the Customer of a specific performance (usually, upon the successful implementation of a specific repayment program). In the case of Definitive Write-downs, both the accounting and the legal reduction (Debt Forgiveness) take place immediately and simultaneously, whereas in the case of Contingent Write-downs, the accounting reduction takes place when the relevant decision is taken or when the agreement is concluded, while the legal reduction (Debt Forgiveness) takes place either simultaneously with the relevant decision or at a later (future) time, depending on the type of the condition.

Contingent Write-downs of debts are in turn classified into:

(a) **Resolutive Condition**, i.e. the debt is accounting and legal write down at the time of reaching the agreement with the Debtor and is revived only in the event that the debtor does not pay the remaining amount and

(b) **Condition Precedent**, i.e. the debt is legally written down if the Debtor repays the debt in accordance with the relevant agreement.

Indicative conditions for the submission of proposals for writing-off part or total amount of the exposure include, but are not limited to, the following:

- The relevant Agreements with the Customers have been terminated.
- Payment Orders have been issued against all liable parties to such Agreements.
- The actions regarding the investigation of immovable property have been completed without any results.
- The procedure for the registration of encumbrances.

- At least one real estate property has been auctioned, so that the preferential claims (through the final creditor's classification list) and, by extension, the Group's potential losses, are finalised.
- In cases where the likelihood of further recovery of the debt is considered to be particularly low, due to:
  - the fact that the debtors are placed under special liquidation;
  - the proven existence of preferential claims of a significant amount and the adoption of a decision to cease litigation actions, in order to avoid non-collectable enforcement costs;
  - the fact that further litigation actions seeking collection of the claim is economically unprofitable (e.g. low-value collateral);

The write-off requires the existence of an equal amount of provision for impairment, established no later than in the quarter preceding the submission of the proposal.

DUE FROM BANKS

Exposure to credit institutions relates to loans, interbank transactions (which include positions in derivatives), reverse repos transactions and International Trade activities. Following the basic rules of designation, monitoring and revision of corporate lending, boundaries are established by the relevant Credit Committees for the monitoring of credit risk for the overall exposure per credit institution counterparty, excluding positions related to bonds issued by them. The approved credit limits are monitored on a daily basis. The validity period of the limits is specified in the approval of the limits in accordance with the counterparty credit institutions rating from international credit rating agencies.

In addition to the regular revisions of counterparty credit institutions limits, interim revisions may be carried out either due to circumstances associated with the trading activity of the Group or due to markets conditions or problems associated with counterparty credit institutions. Trigger events for an extraordinary review are regularly monitored per counterparty in order to review the relevant limits when such trigger events exist.

At each reporting date, a loss allowance for expected credit losses on due from banks is recognized.

The loss allowance is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the receivable falls under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized.

Due from bank's credit risk is assessed based on credit rating of rating agencies or internal credit rating of the counterparty when a loan exposure exists at bank level.

The Group defines as low credit risk all investment grade counterparties, for which it calculates a credit allowance equal to a 12-month expected credit loss (Stage 1).

For counterparties which do not meet the criteria of investment grade, the assessment of the significant increase in credit risk for which calculation of lifetime expected credit losses is required (Stage 2), is based on the two following conditions (whichever occurs first):

- Downgrade by at least two notches of the counterparty credit rating between the reporting date and the initial recognition date
- The 12-month PD at reporting date is above 5% in absolute terms and has increased more than 50% compared to the respective PD existing at initial recognition date.

INVESTMENTS IN DEBT SECURITIES

Investments in debt securities relate to securities that are classified into investment security portfolio. If there is a loan relationship with the counterparty issuer at the time of classification of the security position as investment, the Corporate Credit Policy procedures apply. These positions are subject to Group investment limits and issuer's limits and are monitored on a daily basis.

At each reporting date, a loss allowance for expected credit losses on bonds, which are not measured at fair value through profit or loss, is recognized.

The loss allowance is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the debt securities fall under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized.

Credit risk of investment in debt securities is assessed based on credit ratings of rating agencies or internal credit rating in case of Greek corporate issuers for which loan exposure exists.

The Group defines as low credit risk all investment grade securities, for which it calculates a credit allowance equal to a 12-month expected credit loss (Stage 1).

For debt securities, which do not meet the criteria of investment grade, the assessment of the significant increase in credit risk for which calculation of lifetime expected credit losses is required (Stage 2), is based on the two following conditions:

- Downgrade by at least two notches of the counterparty credit rating between the reporting date and the initial recognition date
- The 12-month PD at reporting date is above 5% in absolute terms and has increased more than 50% compared to the respective PD existing at initial recognition date

In addition, the Group is monitoring, the change in credit spreads since the initial recognition date. A change in the credit spread of the issue of more than 500bps since the initial recognition date is a trigger for the review of the debt instrument staging.

Depending on the outcome of the above review the debt instrument will remain at Stage 1 or be allocated at Stage 2, regardless of whether the primary staging criteria for allocation to Stage 2 have been triggered or not.

FINANCIAL ASSETS EXPOSURE TO CREDIT RISK

The maximum credit risk exposure per category of financial asset in which the Group is exposed is depicted in the "Net exposure to credit risk" column.

	31.12.2020		
	Exposure before impairment	Provision for impairment losses	Net exposure to credit risk
A. Credit risk exposure relating to balance sheet items			
Balances with central Banks	7,077,100		7,077,100
Receivables from credit institutions	2,811,635	70,088	2,741,547
Loans and advances to customers:			
- Loans measured at amortised cost	48,403,731	9,611,635	38,792,096
- Advances to customers measured at amortised cost	314,251	47,227	267,024
- Advances to customers measured at fair value through profit or loss	40,000		40,000
- Loans measured at fair value through profit or loss	280,882		280,882
Total	**49,038,864**	**9,658,862**	**39,380,002**
Derivative financial assets	1,267,083		1,267,083
Trading securities:			
- Government bonds	29,154		29,154
Total	**29,154**	**-**	**29,154**
Investments securities measured at fair value through other comprehensive income:			
- Securities measured at fair value through other comprehensive income (Government bonds)	4,626,389	7,170	4,619,219
- Securities measured at fair value through other comprehensive income (other)	1,920,335	8,743	1,911,592
Total	**6,546,724**	**15,913**	**6,530,811**
Investment securities measured at amortised cost:			
- Securities measured at amortised cost (Government bonds)	2,788,310	9,132	2,779,178
- Securities measured at amortised cost (other)	557,755	1,200	556,555
Total	**3,346,065**	**10,332**	**3,335,733**
Investment securities measured at fair value through profit or loss:			
- Securities measured at fair value through profit or loss (other)	13,243		13,243
Total	**13,243**	**-**	**13,243**
Held for sale assets – Loan's portfolio:			
- Loan's portfolio measured at amortised cost	602,465	459,147	143,318
- Loan's portfolio measured at fair value through profit or loss			
Total	**602,465**	**459,147**	**143,318**
Total amount of balance sheet items exposed to credit risk (a)	**70,732,333**	**10,214,342**	**60,517,991**
Other balance sheet items not exposed to credit risk	9,919,444	380,728	9,538,716
Total Assets	**80,651,777**	**10,595,070**	**70,056,707**
B. Credit risk exposure relating to off balance sheet items:			
Letters of guarantee, letters of credit and other guarantees	3,497,205	85,355	3,411,850
Undrawn loan commitments	4,472,897	6,127	4,466,770
Total amount of off balance sheet items exposed to credit risk (b)	**7,970,102**	**91,482**	**7,878,620**
Total credit risk exposure (a+b)	**78,702,435**	**10,305,824**	**68,396,611**

262 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019		
	Exposure before impairment	**Provision for impairment losses**	**Net exposure to credit risk**
A. Credit risk exposure relating to balance sheet items			
Balances with central Banks	1,589,936		1,589,936
Receivables from credit institutions	3,402,782	70,092	3,332,690
Loans and advances to customers			
Loans measured at amortised cost	48,120,634	9,332,990	38,787,644
Advances to customers measured at amortised cost	212,500	41,011	171,489
Loans measured at fair value through profit or loss	307,136		307,136
Total	**48,640,270**	**9,374,001**	**39,266,269**
Derivative financial assets	1,009,193		1,009,193
Trading securities:			
- Government bonds	17,861		17,861
Total	**17,861**	**-**	**17,861**
Investment securities measured at fair value through other comprehensive income:			
- Securities measured at fair value through other comprehensive income (Government bonds)	5,983,809	22,176	5,961,633
- Securities measured at fair value through other comprehensive income (other)	1,509,193	3,662	1,505,531
Total	**7,493,002**	**25,838**	**7,467,164**
Investment securities measured at amortised cost			
-Securities measured at amortised cost	1,078,143	7,413	1,070,730
Total	**1,078,143**	**7,413**	**1,070,730**
Investment securities measured at fair value through profit or loss:			
- Securities measured at fair value through profit or loss (other)	22,581		22,581
Total	**22,581**		**22,581**
- Held for sale assets – Loan's portfolio			
- Loan's portfolio measured at amortised cost	1,744,911	1,313,223	431,688
- Loan's portfolio measured at fair value through profit or loss			
Total	**1,744,911**	**1,313,223**	**431,688**
Total amount of balance sheet items exposed to credit risk (a)	**64,998,679**	**10,790,567**	**54,208,112**
Other balance sheet items not exposed to credit risk	9,628,870	379,361	9,249,509
Total Assets	**74,627,549**	**11,169,928**	**63,457,621**
B. Credit risk exposure relating to off balance sheet items:			
Letters of guarantee, letters of credit and other guarantees	3,447,220	87,745	3,359,475
Undrawn loan commitments	4,021,955	5,695	4,016,260
Total amount of off balance sheet items exposed to credit risk (b)	**7,469,175**	**93,440**	**7,375,735**
Total credit risk exposure (a+b)	**72,467,854**	**10,884,007**	**61,583,847**

263 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

LOANS AND ADVANCES TO CUSTOMERS

For credit risk disclosure purposes, the allowance for expected credit losses of loans measured at amortised cost includes also the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) since the Group, from credit risk perspective, monitors the respective adjustment as part of the provisions. These loans were recognized either in the context of acquisition of specific loans or companies (i.e. Emporiki Bank and Citibank's retail operations in Greece), or as a result of significant modification of the terms of the previous loan that led to derecognition. Relevant adjustment has also been performed at the carrying amount of loans before allowance for expected credit losses.

It is noted that the credit risk tables do not include the outstanding balances and allowance for expected credit losses of loans that have been classified as assets held for sale.

Loans per IFRS 9 Stage (past due and not past due)

The following tables present past due and not past due loans, measured at amortised cost, per IFRS 9 Stage as well as loans that are measured at fair value through profit or loss, as at 31.12.2020 and 31.12.2019:

31.12.2020									
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
					Stage 1				
	Not past due	Past due	Net carrying amount	Value of collateral	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	-	-	-	-	7,116,251	307,665	7,423,916	25,958	7,397,958
Mortgage					5,052,325	253,965	5,306,290	4,309	5,301,981
Consumer					663,648	38,989	702,637	6,443	696,194
Credit Cards					745,794	8,646	754,440	11,453	742,987
Small Businesses					654,484	6,065	660,549	3,753	656,796
Corporate lending	200,402	80,480	280,882	252,848	12,805,360	187,701	12,993,061	69,138	12,923,923
Large corporate	200,163	75,654	275,817	252,570	7,969,210	57,684	8,026,894	48,886	7,978,008
SME's	239	4,826	5,065	278	4,836,150	130,017	4,966,167	20,252	4,945,915
Public sector	-	-	-	-	78,127	747	78,874	465	78,409
Greece					42,297	747	43,044	253	42,791
Other countries					35,830		35,830	212	35,618
Total	200,402	80,480	280,882	252,848	19,999,738	496,113	20,495,851	95,561	20,400,290

264 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2020									
	Loans measured at amortised cost									
	Stage 2					Stage 3				
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**3,781,709**	**648,188**	**4,429,897**	**290,113**	**4,139,784**	**2,003,394**	**8,507,051**	**10,510,445**	**4,472,441**	**6,038,004**
Mortgage	2,421,601	507,996	2,929,597	116,168	2,813,429	1,130,209	4,699,193	5,829,402	1,991,503	3,837,899
Consumer	427,169	65,561	492,730	82,957	409,773	349,630	1,444,680	1,794,310	1,111,188	683,122
Credit Cards	109,225	45,364	154,589	32,762	121,827	12,701	217,423	230,124	142,800	87,324
Small Businesses	823,714	29,267	852,981	58,226	794,755	510,854	2,145,755	2,656,609	1,226,950	1,429,659
Corporate lending	**1,682,976**	**107,571**	**1,790,547**	**51,636**	**1,738,911**	**1,353,730**	**3,698,266**	**5,051,996**	**2,497,120**	**2,554,876**
Large corporate	1,171,033	60,940	1,231,973	38,052	1,193,921	625,345	1,636,518	2,261,863	1,053,738	1,208,125
SME's	511,943	46,631	558,574	13,584	544,990	728,385	2,061,748	2,790,133	1,443,382	1,346,751
Public sector	**339**	**146**	**485**	**18**	**467**	**920**	**884**	**1,804**	**746**	**1,058**
Greece		146	146		146	920	884	1,804	746	1,058
Other countries	339	0	339	18	321					
Total	**5,465,024**	**755,905**	**6,220,929**	**341,767**	**5,879,162**	**3,358,044**	**12,206,201**	**15,564,245**	**6,970,307**	**8,593,938**

	31.12.2020						
	Loans measured at amortised cost						
	Purchased or originated credit impaired loans (POCI)					Total net carrying amount at amortised cost	Value of collateral
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount		
Retail lending	**1,618,637**	**3,446,943**	**5,065,580**	**1,668,277**	**3,397,303**	**20,973,049**	**17,672,580**
Mortgage	1,004,277	1,938,229	2,942,506	716,276	2,226,230	14,179,539	13,928,449
Consumer	405,250	791,618	1,196,868	519,782	677,086	2,466,175	1,120,501
Credit Cards	2,534	41,119	43,653	31,560	12,093	964,231	14,306
Small Businesses	206,576	675,977	882,553	400,659	481,894	3,363,104	2,609,324
Corporate lending	**415,882**	**641,185**	**1,057,067**	**535,669**	**521,398**	**17,739,108**	**13,462,572**
Large corporate	305,012	171,070	476,082	156,823	319,259	10,699,313	7,970,331
SME's	110,870	470,115	580,985	378,846	202,139	7,039,795	5,492,241
Public sector	**-**	**59**	**59**	**54**	**5**	**79,939**	**43,902**
Greece		59	59	54	5	44,000	36,659
Other countries						35,939	7,243
Total	**2,034,519**	**4,088,187**	**6,122,706**	**2,204,000**	**3,918,706**	**38,792,096**	**31,179,054**

 The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019									
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
					Stage 1				
	Not past due	Past due	Net carrying amount	Value of collateral	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**-**	**450**	**450**	**450**	**7,096,582**	**435,138**	**7,531,720**	**30,210**	**7,501,510**
Mortgage					5,040,716	370,157	5,410,873	4,837	5,406,036
Consumer		450	450	450	689,514	39,698	729,212	9,608	719,604
Credit Cards					906,396	14,560	920,956	13,015	907,941
Small Businesses					459,956	10,723	470,679	2,750	467,929
Corporate lending	**157,442**	**149,244**	**306,686**	**265,624**	**12,335,217**	**336,060**	**12,671,277**	**87,663**	**12,583,614**
Large corporate	151,733	140,357	292,090	264,985	8,058,780	171,944	8,230,724	70,466	8,160,258
SME's	5,709	8,887	14,596	639	4,276,437	164,116	4,440,553	17,197	4,423,356
Public sector					**101,114**	**182**	**101,296**	**398**	**100,898**
Greece					53,657	182	53,839	156	53,683
Other countries					47,457		47,457	242	47,215
Total	**157,442**	**149,694**	**307,136**	**266,074**	**19,532,913**	**771,380**	**20,304,293**	**118,271**	**20,186,022**

31.12.2019										
	Loans measured at amortised cost									
	Stage 2					Stage 3				
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**2,563,078**	**1,575,385**	**4,138,463**	**296,431**	**3,842,032**	**1,678,491**	**9,370,899**	**11,049,390**	**4,202,904**	**6,846,486**
Mortgage	1,554,220	1,323,708	2,877,928	100,889	2,777,039	625,133	5,542,478	6,167,611	1,919,141	4,248,470
Consumer	313,191	128,756	441,947	85,983	355,964	510,684	1,349,491	1,860,175	1,015,872	844,303
Credit Cards	72,077	46,564	118,641	36,617	82,024	34,111	203,615	237,726	121,252	116,474
Small Businesses	623,590	76,357	699,947	72,942	627,005	508,563	2,275,315	2,783,878	1,146,639	1,637,239
Corporate lending	**1,029,172**	**181,982**	**1,211,154**	**40,934**	**1,170,220**	**1,417,036**	**3,752,573**	**5,169,609**	**2,519,067**	**2,650,542**
Large corporate	732,665	128,994	861,659	28,230	833,429	707,873	1,812,832	2,520,705	1,186,754	1,333,951
SME's	296,507	52,988	349,495	12,704	336,791	709,163	1,939,741	2,648,904	1,332,313	1,316,591
Public sector	**257**	**211**	**468**	**24**	**444**	**923**	**876**	**1,799**	**651**	**1,148**
Greece		14	14		14	923	876	1,799	651	1,148
Other countries	257	197	454	24	430					
Total	**3,592,507**	**1,757,578**	**5,350,085**	**337,389**	**5,012,696**	**3,096,450**	**13,124,348**	**16,220,798**	**6,722,622**	**9,498,176**

266 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019							
	Loans measured at amortised cost						
	Purchased or originated credit impaired loans (POCI)					Total net carrying amount at amortised cost	Value of collateral
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount		
Retail lending	**1,103,425**	**4,073,377**	**5,176,802**	**1,630,785**	**3,546,017**	**21,736,045**	**17,582,278**
Mortgage	541,794	2,475,513	3,017,307	701,123	2,316,184	14,747,729	13,949,755
Consumer	389,318	837,040	1,226,358	498,756	727,602	2,647,473	1,121,961
Credit Cards	4,913	41,694	46,607	29,554	17,053	1,123,492	15,006
Small Businesses	167,400	719,130	886,530	401,352	485,178	3,217,351	2,495,556
Corporate lending	**420,195**	**645,373**	**1,065,568**	**523,872**	**541,696**	**16,946,072**	**12,954,942**
Large corporate	312,324	175,781	488,105	148,406	339,699	10,667,337	7,878,539
SME's	107,871	469,592	577,463	375,466	201,997	6,278,735	5,076,403
Public sector	**3,032**	**56**	**3,088**	**51**	**3,037**	**105,527**	**60,808**
Greece	3,032	56	3,088	51	3,037	57,882	47,256
Other countries						47,645	13,552
Total	**1,526,652**	**4,718,806**	**6,245,458**	**2,154,708**	**4,090,750**	**38,787,644**	**30,598,028**

"Purchased or originated credit impaired loans" include loans amounting to € 1,015,682 as at 31.12.2020 (31.12.2019: € 883,149) which are not credit impaired/non performing.

267 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Loans by credit quality and IFRS 9 Stage

The following tables present loans measured at amortised cost by IFRS 9 Stage and credit quality, as well as loans that are measured at fair value through profit or loss by credit quality, as at 31.12.2020 and 31.12.2019.

31.12.2020						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
MORTGAGE						
Strong credit quality	4,823,363	160,793		92,469	5,076,625	
Satisfactory credit quality	480,190	1,569,401		202,359	2,251,950	
Watch list (higher risk)	2,737	1,199,403		314,502	1,516,642	
Default			5,829,402	2,333,176	8,162,578	
Carrying amount (before allowance for expected credit losses)	**5,306,290**	**2,929,597**	**5,829,402**	**2,942,506**	**17,007,795**	
Allowance for expected credit losses	(4,309)	(116,168)	(1,991,503)	(716,276)	(2,828,256)	
Net Carrying Amount	**5,301,981**	**2,813,429**	**3,837,899**	**2,226,230**	**14,179,539**	**-**
Value of collateral	4,996,702	2,600,966	4,079,225	2,251,556	13,928,449	
CONSUMER						
Strong credit quality	527,089	15,222		15,037	557,348	
Satisfactory credit quality	175,138	149,903		43,767	368,808	
Watch list (higher risk)	410	327,605		152,479	480,494	
Default			1,794,310	985,585	2,779,895	
Carrying amount (before allowance for expected credit losses)	**702,637**	**492,730**	**1,794,310**	**1,196,868**	**4,186,545**	
Allowance for expected credit losses	(6,443)	(82,957)	(1,111,188)	(519,782)	(1,720,370)	
Net Carrying Amount	**696,194**	**409,773**	**683,122**	**677,086**	**2,466,175**	**-**
Value of collateral	229,858	108,132	310,310	472,201	1,120,501	
CREDIT CARDS						
Strong credit quality	585,934	8,046		419	594,399	
Satisfactory credit quality	168,429	28,732		472	197,633	
Watch list (higher risk)	77	117,811		731	118,619	
Default			230,124	42,031	272,155	
Carrying amount (before allowance for expected credit losses)	**754,440**	**154,589**	**230,124**	**43,653**	**1,182,806**	
Allowance for expected credit losses	(11,453)	(32,762)	(142,800)	(31,560)	(218,575)	
Net Carrying Amount	**742,987**	**121,827**	**87,324**	**12,093**	**964,231**	**-**
Value of collateral	1,722	67	12,482	35	14,306	
SMALL BUSINESSES						
Strong credit quality	491,347	1,436		8,688	501,471	
Satisfactory credit quality	158,259	235,130		29,139	422,528	
Watch list (higher risk)	10,943	616,415		81,978	709,336	
Default			2,656,609	762,748	3,419,357	
Carrying amount (before allowance for expected credit losses)	**660,549**	**852,981**	**2,656,609**	**882,553**	**5,052,692**	
Allowance for expected credit losses	(3,753)	(58,226)	(1,226,950)	(400,659)	(1,689,588)	
Net Carrying Amount	**656,796**	**794,755**	**1,429,659**	**481,894**	**3,363,104**	**-**
Value of collateral	384,285	552,326	1,292,925	379,788	2,609,324	

The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2020						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
LARGE CORPORATE						
Strong credit quality	5,322,646	103,240			5,425,886	67,911
Satisfactory credit quality	2,636,686	799,132		46,669	3,482,487	32,012
Watch list (higher risk)	67,562	329,601		15,340	412,503	41,527
Default			2,261,863	414,073	2,675,936	134,367
Carrying amount (before allowance for expected credit losses)	**8,026,894**	**1,231,973**	**2,261,863**	**476,082**	**11,996,812**	
Allowance for expected credit losses	(48,886)	(38,052)	(1,053,738)	(156,823)	(1,297,499)	
Net Carrying Amount	**7,978,008**	**1,193,921**	**1,208,125**	**319,259**	**10,699,313**	**275,817**
Value of collateral	5,268,379	969,808	1,442,660	289,484	7,970,331	252,570
SME's						
Strong credit quality	2,046,914	39,092			2,086,006	
Satisfactory credit quality	2,899,013	430,687		10,886	3,340,586	
Watch list (higher risk)	20,240	88,795		118	109,153	
Default			2,790,133	569,981	3,360,114	5,065
Carrying amount (before allowance for expected credit losses)	**4,966,167**	**558,574**	**2,790,133**	**580,985**	**8,895,859**	
Allowance for expected credit losses	(20,252)	(13,584)	(1,443,382)	(378,846)	(1,856,064)	
Net Carrying Amount	**4,945,915**	**544,990**	**1,346,751**	**202,139**	**7,039,795**	**5,065**
Value of collateral	3,211,503	461,111	1,592,038	227,589	5,492,241	278
PUBLIC SECTOR						
Strong credit quality	6,080				6,080	
Satisfactory credit quality	72,794	485			73,279	
Watch list (higher risk)						
Default			1,804	59	1,863	
Carrying amount (before allowance for expected credit losses)	**78,874**	**485**	**1,804**	**59**	**81,222**	
Allowance for expected credit losses	(465)	(18)	(746)	(54)	(1,283)	
Net Carrying Amount	**78,409**	**467**	**1,058**	**5**	**79,939**	**-**
Value of collateral	42,647	485	770		43,902	

269 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
MORTGAGE						
Strong credit quality	4,976,852	26,171		86,764	5,089,787	
Satisfactory credit quality	404,037	1,823,512		217,741	2,445,290	
Watch list (higher risk)	29,984	1,028,245		258,619	1,316,848	
Default			6,167,611	2,454,183	8,621,794	
Carrying amount (before allowance for expected credit losses)	**5,410,873**	**2,877,928**	**6,167,611**	**3,017,307**	**17,473,719**	
Allowance for expected credit losses	(4,837)	(100,889)	(1,919,141)	(701,123)	(2,725,990)	
Net Carrying Amount	**5,406,036**	**2,777,039**	**4,248,470**	**2,316,184**	**14,747,729**	
Value of collateral	5,033,118	2,479,916	4,204,055	2,232,666	13,949,755	
CONSUMER						
Strong credit quality	512,325	6,900		18,052	537,277	
Satisfactory credit quality	210,039	149,906		37,359	397,304	
Watch list (higher risk)	6,848	285,141		114,689	406,678	
Default			1,860,175	1,056,258	2,916,433	450
Carrying amount (before allowance for expected credit losses)	**729,212**	**441,947**	**1,860,175**	**1,226,358**	**4,257,692**	
Allowance for expected credit losses	(9,608)	(85,983)	(1,015,872)	(498,756)	(1,610,219)	
Net Carrying Amount	**719,604**	**355,964**	**844,303**	**727,602**	**2,647,473**	**450**
Value of collateral	233,844	99,556	321,417	467,144	1,121,961	450
CREDIT CARDS						
Strong credit quality	690,460	1,888		622	692,970	
Satisfactory credit quality	230,383	8,334		608	239,325	
Watch list (higher risk)	113	108,419		821	109,353	
Default			237,726	44,556	282,282	
Carrying amount (before allowance for expected credit losses)	**920,956**	**118,641**	**237,726**	**46,607**	**1,323,930**	
Allowance for expected credit losses	(13,015)	(36,617)	(121,252)	(29,554)	(200,438)	
Net Carrying Amount	**907,941**	**82,024**	**116,474**	**17,053**	**1,123,492**	
Value of collateral	2,283	27	12,661	35	15,006	
SMALL BUSINESSES						
Strong credit quality	318,149	934		4,054	323,137	
Satisfactory credit quality	141,973	213,701		24,043	379,717	
Watch list (higher risk)	10,557	485,312		67,654	563,523	
Default			2,783,878	790,779	3,574,657	
Carrying amount (before allowance for expected credit losses)	**470,679**	**699,947**	**2,783,878**	**886,530**	**4,841,034**	
Allowance for expected credit losses	(2,750)	(72,942)	(1,146,639)	(401,352)	(1,623,683)	
Net Carrying Amount	**467,929**	**627,005**	**1,637,239**	**485,178**	**3,217,351**	
Value of collateral	339,017	423,471	1,361,403	371,665	2,495,556	
LARGE CORPORATE						
Strong credit quality	4,828,466	42,735			4,871,201	52,127
Satisfactory credit quality	3,272,371	500,344		24,575	3,797,290	70,370
Watch list (higher risk)	129,887	318,580	1,789	15,569	465,825	31,060
Default			2,518,916	447,961	2,966,877	138,533
Carrying amount (before allowance for expected credit losses)	**8,230,724**	**861,659**	**2,520,705**	**488,105**	**12,101,193**	
Allowance for expected credit losses	(70,466)	(28,230)	(1,186,754)	(148,406)	(1,433,856)	
Net Carrying Amount	**8,160,258**	**833,429**	**1,333,951**	**339,699**	**10,667,337**	**292,090**
Value of collateral	5,245,037	754,860	1,622,859	255,783	7,878,539	264,985

270 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
SME's						
Strong credit quality	1,750,549	11,725			1,762,274	
Satisfactory credit quality	2,640,695	187,054		7,128	2,834,877	
Watch list (higher risk)	49,309	150,716		4,352	204,377	
Default			2,648,904	565,983	3,214,887	14,596
Carrying amount (before allowance for expected credit losses)	**4,440,553**	**349,495**	**2,648,904**	**577,463**	**8,016,415**	
Allowance for expected credit losses	(17,197)	(12,704)	(1,332,313)	(375,466)	(1,737,680)	
Net Carrying Amount	**4,423,356**	**336,791**	**1,316,591**	**201,997**	**6,278,735**	**14,596**
Value of collateral	3,070,036	274,778	1,505,182	226,407	5,076,403	639
PUBLIC SECTOR						
Strong credit quality	2,389				2,389	
Satisfactory credit quality	52,813	468			53,281	
Watch list (higher risk)	46,094				46,094	
Default			1,799	3,088	4,887	
Carrying amount (before allowance for expected credit losses)	**101,296**	**468**	**1,799**	**3,088**	**106,651**	
Allowance for expected credit losses	(398)	(24)	(651)	(51)	(1,124)	
Net Carrying Amount	**100,898**	**444**	**1,148**	**3,037**	**105,527**	
Value of collateral	59,604	454	750		60,808	

271 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Letters of guarantee, letters of credit and undrawn loan commitments by credit quality and IFRS 9 Stage

31.12.2020					
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Letters of guarantee, letters of credit and other guarantees					
Strong credit quality	2,077,772	294			2,078,066
Satisfactory credit quality	715,774	198,977			914,751
Watch list (higher risk)	48,531	125,012			173,543
Default			330,845		330,845
Carrying amount (before allowance for expected credit losses)	**2,842,077**	**324,283**	**330,845**	**-**	**3,497,205**
Allowance for expected credit losses	(4,048)	(7,825)	(73,482)		(85,355)
Net Carrying Amount	**2,838,029**	**316,458**	**257,363**	**-**	**3,411,850**
Value of collateral of impaired letters of guarantee, letters of credit and other guarantees			49,874		49,874
Undrawn loan commitments					
Strong credit quality	3,235,017	13,607		744	3,249,368
Satisfactory credit quality	1,061,720	103,172		3,311	1,168,203
Watch list (higher risk)	10,810	38,735		202	49,747
Default			5,377	202	5,579
Carrying amount (before allowance for expected credit losses)	**4,307,547**	**155,514**	**5,377**	**4,459**	**4,472,897**
Allowance for expected credit losses	(3,570)	(1,514)	(1,040)	(3)	(6,127)
Net Carrying Amount	**4,303,977**	**154,000**	**4,337**	**4,456**	**4,466,770**
Value of collateral of undrawn loan commitments			165	23	188

31.12.2019					
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Letters of guarantee, letters of credit and other guarantees					
Strong credit quality	1,331,348	97			1,331,445
Satisfactory credit quality	1,146,496	20,759			1,167,255
Watch list (higher risk)	594,417	14,042			608,459
Default			340,061		340,061
Carrying amount (before allowance for expected credit losses)	**3,072,261**	**34,898**	**340,061**	**-**	**3,447,220**
Allowance for expected credit losses	(13,094)	(411)	(74,240)		(87,745)
Net Carrying Amount	**3,059,167**	**34,487**	**265,821**	**-**	**3,359,475**
Value of collateral of impaired letters of guarantee, letters of credit and other guarantees			45,094		45,094
Undrawn loan commitments					
Strong credit quality	2,987,194	1,083		371	2,988,648
Satisfactory credit quality	917,436	50,430		246	968,112
Watch list (higher risk)	18,133	40,627		47	58,807
Default			5,997	391	6,388
Carrying amount (before allowance for expected credit losses)	**3,922,763**	**92,140**	**5,997**	**1,055**	**4,021,955**
Allowance for expected credit losses	(2,932)	(1,878)	(878)	(7)	(5,695)
Net Carrying Amount	**3,919,831**	**90,262**	**5,119**	**1,048**	**4,016,260**
Value of collateral of undrawn loan commitments			599	90	689

The value of the collaterals that relates to impaired exposures, amounts to € 11,665,870 as at 31.12.2020 (31.12.2019: € 12,010,368).

272 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Ageing analysis by IFRS 9 Stage and product line of loans

31.12.2020									
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
	Retail lending	Corporate lending		Total	Retail lending				
					Mortgage				
	Consumer	Large Corporate	SME's		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current		200,163	239	200,402	5,048,675	2,323,194	984,031	909,938	9,265,838
1 - 30 days		15,683		15,683	253,306	274,815	154,218	111,178	793,517
31 - 60 days			4,343	4,343		112,873	96,136	56,196	265,205
61 - 90 days						102,547	189,690	100,640	392,877
91 - 180 days							83,993	23,767	107,760
181 - 360 days		1,807		1,807			99,062	35,591	134,653
> 360 days		58,164	483	58,647			2,230,769	988,920	3,219,689
Total		**275,817**	**5,065**	**280,882**	**5,301,981**	**2,813,429**	**3,837,899**	**2,226,230**	**14,179,539**
Value of collaterals		252,570	278	252,848	4,996,702	2,600,966	4,079,225	2,251,556	13,928,449

31.12.2020										
	Loans measured at amortised cost									
	Retail lending									
	Consumer					Credit Cards				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	658,034	354,475	200,027	323,651	1,536,187	734,687	87,248	6,516	1,772	830,223
1 - 30 days	38,160	32,186	25,467	14,477	110,290	8,300	24,141	1,144	315	33,900
31 - 60 days		14,125	17,797	9,305	41,227		6,839	2,957	366	10,162
61 - 90 days		8,987	8,697	4,410	22,094		3,599	2,400	233	6,232
91 - 180 days			24,977	8,057	33,034			4,213	159	4,372
181 - 360 days			38,566	8,909	47,475			20,441	1,949	22,390
> 360 days			367,591	308,277	675,868			49,653	7,299	56,952
Total	**696,194**	**409,773**	**683,122**	**677,086**	**2,466,175**	**742,987**	**121,827**	**87,324**	**12,093**	**964,231**
Value of collaterals	229,858	108,132	310,310	472,201	1,120,501	1,722	67	12,482	35	14,306

 The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2020										
	Loans measured at amortised cost									
	Retail lending					Corporate lending				
	Small Business					Large Corporate				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	650,844	767,345	421,802	178,955	2,018,946	7,920,486	1,133,823	436,518	260,263	9,751,090
1 - 30 days	5,952	19,601	11,702	3,913	41,168	57,522	33,386	139,181	17,056	247,145
31 - 60 days		5,179	10,823	3,345	19,347		18,102	2,250		20,352
61 - 90 days		2,630	6,496	1,876	11,002		8,610	20,393		29,003
91 - 180 days			14,405	1,629	16,034			14,461		14,461
181 - 360 days			14,862	1,823	16,685			101,841		101,841
> 360 days			949,569	290,353	1,239,922			493,481	41,940	535,421
Total	**656,796**	**794,755**	**1,429,659**	**481,894**	**3,363,104**	**7,978,008**	**1,193,921**	**1,208,125**	**319,259**	**10,699,313**
Value of collaterals	384,285	552,326	1,292,925	379,788	2,609,324	5,268,379	969,808	1,442,660	289,484	7,970,331

31.12.2020													
	Loans measured at amortised cost												
	Corporate lending					Public Sector							
	SME's					Greece					Other Countries		
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Total
Current	4,817,542	499,678	534,088	64,228	5,915,536	42,045		725		42,770	35,618	321	35,939
1 - 30 days	128,361	36,880	202,547	13,469	381,257	746				746			
31 - 60 days	12	5,217	29,097	3,920	38,246								
61 - 90 days		3,215	27,495	2,473	33,183		146			146			
91 - 180 days			41,779	1,926	43,705								
181 - 360 days			23,565	2,041	25,606								
> 360 days			488,180	114,082	602,262			333	5	338			
Total	**4,945,915**	**544,990**	**1,346,751**	**202,139**	**7,039,795**	**42,791**	**146**	**1,058**	**5**	**44,000**	**35,618**	**321**	**35,939**
Value of collaterals	3,211,503	461,111	1,592,038	227,589	5,492,241	35,743	146	770		36,659	6,904	339	7,243

274 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019									
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
	Retail lending	Corporate lending		Total	Retail lending				
					Mortgage				
	Consumer	Large Corporate	SME's		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current		151,734	5,709	157,443	5,037,095	1,497,725	568,698	506,205	7,609,723
1 - 30 days		75,418		75,418	368,941	785,081	302,852	299,160	1,756,034
31 - 60 days						243,061	169,155	107,288	519,504
61 - 90 days		46,079		46,079		251,172	423,282	270,236	944,690
91 - 180 days		8,329		8,329			201,639	68,036	269,675
181 - 360 days		10,530	8,887	19,417			236,532	56,320	292,852
> 360 days	450			450			2,346,312	1,008,939	3,355,251
Total	**450**	**292,090**	**14,596**	**307,136**	**5,406,036**	**2,777,039**	**4,248,470**	**2,316,184**	**14,747,729**
Value of collaterals	450	264,985	639	266,074	5,033,118	2,479,916	4,204,055	2,232,666	13,949,755

31.12.2019										
	Loans measured at amortised cost									
	Retail lending									
	Consumer					Credit Cards				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	680,911	255,986	271,787	291,766	1,500,450	893,844	50,677	22,423	3,578	970,522
1 - 30 days	38,693	67,449	54,164	34,742	195,048	14,097	22,620	12,152	1,889	50,758
31 - 60 days		21,120	37,264	17,199	75,583		5,387	7,146	871	13,404
61 - 90 days		11,409	32,712	15,245	59,366		3,340	8,337	968	12,645
91 - 180 days			52,707	23,965	76,672			12,055	1,361	13,416
181 - 360 days			38,526	15,159	53,685			11,808	1,291	13,099
> 360 days			357,143	329,526	686,669			42,553	7,095	49,648
Total	**719,604**	**355,964**	**844,303**	**727,602**	**2,647,473**	**907,941**	**82,024**	**116,474**	**17,053**	**1,123,492**
Value of collaterals	233,844	99,556	321,417	467,144	1,121,961	2,283	27	12,661	35	15,006

The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019									
	Loans measured at amortised cost									
	Retail lending					Corporate lending				
	Small Business					Large Corporate				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**
Current	457,466	557,649	438,818	141,517	1,595,450	7,988,828	706,796	499,543	272,737	9,467,904
1 - 30 days	10,463	58,206	32,506	11,304	112,479	171,430	31,386	237,557	21,361	461,734
31 - 60 days		7,762	27,708	3,452	38,922		94,444	8,186		102,630
61 - 90 days		3,388	27,508	4,228	35,124		803	10,562		11,365
91 - 180 days			61,394	9,902	71,296			56,663	4,132	60,795
181 - 360 days			39,614	5,484	45,098			30,542	343	30,885
> 360 days			1,009,691	309,291	1,318,982			490,898	41,126	532,024
Total	**467,929**	**627,005**	**1,637,239**	**485,178**	**3,217,351**	**8,160,258**	**833,429**	**1,333,951**	**339,699**	**10,667,337**
Value of collaterals	339,017	423,471	1,361,403	371,665	2,495,556	5,245,037	754,860	1,622,859	255,783	7,878,539

	31.12.2019												
	Loans measured at amortised cost												
	Corporate lending					Public Sector							
	SME's					Greece					Other Countries		
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**	**Stage 1**	**Stage 2**	**Total**
Current	4,260,323	285,975	521,104	64,088	5,131,490	53,501		743	3,033	57,277	47,215	249	47,464
1 - 30 days	163,033	24,833	127,082	7,449	322,397	182	14			196		181	181
31 - 60 days		17,416	46,516	10,059	73,991								
61 - 90 days		8,567	47,878	2,308	58,753								
91 - 180 days			30,854	2,324	33,178			2		2			
181 - 360 days			41,881	8,839	50,720								
> 360 days			501,276	106,930	608,206			403	4	407			
Total	**4,423,356**	**336,791**	**1,316,591**	**201,997**	**6,278,735**	**53,683**	**14**	**1,148**	**3,037**	**57,882**	**47,215**	**430**	**47,645**
Value of collaterals	3,070,036	274,778	1,505,182	226,407	5,076,403	46,506		750		47,256	13,098	454	13,552

276 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of loans by IFRS 9 Stage

The following tables present the movement of the loans measured at amortised cost by IFRS 9 Stage for the years 2020 and 2019:

	31.12.2020														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2020	7,531,720	4,138,463	11,049,390	5,176,802	27,896,375	12,772,573	1,211,622	5,171,408	1,068,656	20,224,259	20,304,293	5,350,085	16,220,798	6,245,458	48,120,634
Changes for the year 1.1 - 31.12.2020															
Transfers to Stage 1 from Stage 2 or 3	1,586,565	(1,563,902)	(22,663)		-	927,982	(834,684)	(93,298)		-	2,514,547	(2,398,586)	(115,961)		-
Transfers to Stage 2 from Stage 1 or 3	(1,771,306)	2,503,854	(732,548)		-	(1,784,289)	1,843,148	(58,859)		-	(3,555,595)	4,347,002	(791,407)		-
Transfers to Stage 3 from Stage 1 or 2	(48,734)	(532,301)	581,035		-	(142,502)	(286,010)	428,512		-	(191,236)	(818,311)	1,009,547		-
New loans originated or purchased	815,557			24,481	840,038	4,086,469			27,075	4,113,544	4,902,026			51,556	4,953,582
Derecognition of loans	(2,515)	(3,712)	(19,282)	(3,044)	(28,553)	(227,069)	(20,100)	(49,973)	(1,342)	(298,484)	(229,584)	(23,812)	(69,255)	(4,386)	(327,037)
Changes due to modifications that did not result in derecognition	(4,213)	(17,154)	(23,331)	(8,194)	(52,892)	(8,612)	(3,636)	(3,513)	54	(15,707)	(12,825)	(20,790)	(26,844)	(8,140)	(68,599)
Write-offs	(1,317)	(12,725)	(444,833)	(200,871)	(659,746)	-	(1,034)	(301,440)	(43,018)	(345,492)	(1,317)	(13,759)	(746,273)	(243,889)	(1,005,238)
Repayments, foreign exchange and other movements	(681,841)	(82,626)	122,677	76,406	(565,384)	(2,552,617)	(118,274)	(39,037)	5,701	(2,704,227)	(3,234,458)	(200,900)	83,640	82,107	(3,269,611)
Reclassification of loans to "Assets held for sale"					-					-					-
Balance 31.12.2020	7,423,916	4,429,897	10,510,445	5,065,580	27,429,838	13,071,935	1,791,032	5,053,800	1,057,126	20,973,893	20,495,851	6,220,929	15,564,245	6,122,706	48,403,731
Allowance for expected credit losses	(25,958)	(290,113)	(4,472,441)	(1,668,277)	(6,456,789)	(69,603)	(51,654)	(2,497,866)	(535,723)	(3,154,846)	(95,561)	(341,767)	(6,970,307)	(2,204,000)	(9,611,635)
Balance of loans 31.12.2020	7,397,958	4,139,784	6,038,004	3,397,303	20,973,049	13,002,332	1,739,378	2,555,934	521,403	17,819,047	20,400,290	5,879,162	8,593,938	3,918,706	38,792,096

The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2019	**7,575,938**	**4,439,430**	**12,037,340**	**5,494,790**	**29,547,498**	**12,013,022**	**1,507,951**	**7,248,402**	**1,430,227**	**22,199,602**	**19,588,960**	**5,947,381**	**19,285,742**	**6,925,017**	**51,747,100**
Changes for the year 1.1 - 31.12.2019															
Transfers to Stage 1 from Stage 2 or 3	1,448,246	(1,425,777)	(22,469)		-	796,708	(788,660)	(8,048)		-	2,244,954	(2,214,437)	(30,517)		-
Transfers to Stage 2 from Stage 1 or 3	(1,331,138)	2,365,296	(1,034,158)		-	(736,029)	814,213	(78,184)		-	(2,067,167)	3,179,509	(1,112,342)		-
Transfers to Stage 3 from Stage 1 or 2	(51,175)	(1,036,173)	1,087,348		-	(219,549)	(237,350)	456,899		-	(270,724)	(1,273,523)	1,544,247		-
New loans originated or purchased	554,011			42,895	596,906	4,155,419			78,273	4,233,692	4,709,430			121,168	4,830,598
Derecognition of loans	(5,253)	(7,937)	(63,461)	(5,627)	(82,278)	(69,623)	(1,816)	(275,228)	(60,342)	(407,009)	(74,876)	(9,753)	(338,689)	(65,969)	(489,287)
Changes due to modifications that did not result in derecognition	(6,588)	(60,959)	(87,342)	(47,959)	(202,848)	28,876	(2,010)	(9,411)	(931)	16,524	22,288	(62,969)	(96,753)	(48,890)	(186,324)
Write-offs	(1,582)	(28,167)	(905,109)	(338,273)	(1,273,131)			(741,396)	(113,679)	(855,075)	(1,582)	(28,167)	(1,646,505)	(451,952)	(2,128,206)
Repayments, foreign exchange and other movements	(647,483)	(106,969)	93,708	34,662	(626,082)	(3,196,251)	(80,706)	(97,707)	28,691	(3,345,973)	(3,843,734)	(187,675)	(3,999)	63,353	(3,972,055)
Reclassification of loans to "Assets held for sale"	(3,256)	(281)	(56,467)	(3,686)	(63,690)			(1,323,919)	(293,583)	(1,617,502)	(3,256)	(281)	(1,380,386)	(297,269)	(1,681,192)
Balance 31.12.2019	**7,531,720**	**4,138,463**	**11,049,390**	**5,176,802**	**27,896,375**	**12,772,573**	**1,211,622**	**5,171,408**	**1,068,656**	**20,224,259**	**20,304,293**	**5,350,085**	**16,220,798**	**6,245,458**	**48,120,634**
Allowance for expected credit losses	(30,210)	(296,431)	(4,202,904)	(1,630,785)	(6,160,330)	(88,061)	(40,958)	(2,519,718)	(523,923)	(3,172,660)	(118,271)	(337,389)	(6,722,622)	(2,154,708)	(9,332,990)
Balance of loans 31.12.2019	**7,501,510**	**3,842,032**	**6,846,486**	**3,546,017**	**21,736,045**	**12,684,512**	**1,170,664**	**2,651,690**	**544,733**	**17,051,599**	**20,186,022**	**5,012,696**	**9,498,176**	**4,090,750**	**38,787,644**

"Repayments, foreign exchange and other movements" for the year 2019 of the loans measured at amortized cost includes amount of € 12.735 which concerns loans for which the Group, in the context of renegotiation of their terms, participated in debt to equity agreements.

278 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of allowance for expected credit losses of loans by IFRS 9 Stage

The following tables include the movement of allowance for expected credit losses of loans measured at amortized cost for the years 2020 and 2019:

	31.12.2020														
	Allowance for expected credit losses														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2020	30,210	296,431	4,202,904	1,630,785	6,160,330	88,061	40,958	2,519,718	523,923	3,172,660	118,271	337,389	6,722,622	2,154,708	9,332,990
Changes for the year 1.1 - 31.12.2020															
Transfers to stage 1 from stage 2 or 3	82,948	(78,961)	(3,987)		-	20,869	(15,443)	(5,426)		-	103,817	(94,404)	(9,413)		-
Transfers to stage 2 from stage 1 or 3	(16,260)	107,322	(91,062)		-	(22,843)	26,916	(4,073)		-	(39,103)	134,238	(95,135)		-
Transfers to stage 3 from stage 1 or 2	(406)	(60,282)	60,688		-	(2,535)	(33,444)	35,979		-	(2,941)	(93,726)	96,667		-
Net remeasurement of expected credit losses(a)	(67,861)	57,414	32,488	3,462	25,503	(11,677)	9,027	47,836	(49)	45,137	(79,538)	66,441	80,324	3,413	70,640
Impairment losses on new loans (b)	9,196			(953)	8,243	21,053			(6,430)	14,623	30,249			(7,383)	22,866
Change in risk parameters (c)	(9,150)	(19,065)	731,423	228,828	932,036	(23,196)	25,125	145,382	40,835	188,146	(32,346)	6,060	876,805	269,663	1,120,182
Impairment losses on loans (a) + (b) + (c)	(67,815)	38,349	763,911	231,337	965,782	(13,820)	34,152	193,218	34,356	247,906	(81,635)	72,501	957,129	265,693	1,213,688
Derecognition of loans	(1)	(71)	(2,409)	(946)	(3,427)	(128)		(6,678)	(541)	(7,347)	(129)	(71)	(9,087)	(1,487)	(10,774)
Write offs	(1,317)	(12,725)	(444,833)	(200,871)	(659,746)		(1,034)	(301,440)	(43,018)	(345,492)	(1,317)	(13,759)	(746,273)	(243,889)	(1,005,238)
Foreign exchange and other movements	(1,401)	50	(15,128)	10,204	(6,275)	(1)	(451)	(3,129)	3,720	139	(1,402)	(401)	(18,257)	13,924	(6,136)
Change in the present value of the impairment losses			2,357	(2,232)	125			69,697	17,283	86,980			72,054	15,051	87,105
Reclassification of allowance for expected credit losses to "Assets held for sale"					-					-					-
Balance 31.12.2020	25,958	290,113	4,472,441	1,668,277	6,456,789	69,603	51,654	2,497,866	535,723	3,154,846	95,561	341,767	6,970,307	2,204,000	9,611,635

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In the above table which presents the movement of allowance for expected credit losses for the year 2020, the amount of € 22,188 which is related to impairment losses of loans classified to assets held for sale in the previous periods is not included in “Impairment losses on loans”.

During 2020, allowance for expected credit losses have been affected by the following movements:

- Transfer to Stage 1 from Stage 2 and Stage 3 of loans amount to € 2,514,547 due to the improvement of the creditworthiness compared to their initial recognition
- The impairment losses of loans classified in Stage 3 were affected by:
  - incorporation in the calculation of the allowance for expected credit losses of non performing portfolios for which the Group contemplates recovery strategies that include a sales scenario affected by a number of variable factors and,
  - further deterioration of the portfolio remaining in Stage 3

Finally, loans written off in 2020 amounted to € 1,005,238, and led to an equal reduction of allowance for expected credit losses. It is noted that loans that have been written off within 2020 but can still be legally claimed amounted to € 911,275.

	31.12.2019														
	Allowance for expected credit losses														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2019	**25,267**	**213,745**	**5,034,516**	**1,857,745**	**7,131,273**	**115,353**	**68,219**	**3,927,356**	**784,167**	**4,895,095**	**140,620**	**281,964**	**8,961,872**	**2,641,912**	**12,026,368**
Changes for the year 1.1 - 31.12.2019															
Transfers to stage 1 from stage 2 or 3	60,851	(54,101)	(6,750)		-	23,533	(21,822)	(1,711)		-	84,384	(75,923)	(8,461)		-
Transfers to stage 2 from stage 1 or 3	(11,214)	188,614	(177,400)		-	(7,530)	16,027	(8,497)		-	(18,744)	204,641	(185,897)		-
Transfers to stage 3 from stage 1 or 2	(525)	(89,216)	89,741		-	(5,708)	(15,442)	21,150		-	(6,233)	(104,658)	110,891		-
Net remeasurement of expected credit losses (a)	(49,253)	9,621	96,771	(4,658)	52,481	(17,064)	(1,006)	91,486	(1,154)	72,262	(66,317)	8,615	188,257	(5,812)	124,743
Impairment losses on new loans (b)	3,798			(6,031)	(2,233)	24,295			(3,279)	21,016	28,093			(9,310)	18,783
Change in risk parameters (c)	7,052	56,417	136,499	136,665	336,633	(41,516)	(9,227)	264,656	50,173	264,086	(34,464)	47,190	401,155	186,838	600,719
Impairment losses on loans (a) + (b) + (c)	**(38,403)**	**66,038**	**233,270**	**125,976**	**386,881**	**(34,285)**	**(10,233)**	**356,142**	**45,740**	**357,364**	**(72,688)**	**55,805**	**589,412**	**171,716**	**744,245**
Derecognition of loans	(23)	(230)	(10,974)	(2,365)	(13,592)	(329)	(34)	(125,043)	(10,914)	(136,320)	(352)	(264)	(136,017)	(13,279)	(149,912)
Write offs	(1,582)	(28,167)	(905,109)	(338,273)	(1,273,131)			(741,396)	(113,679)	(855,075)	(1,582)	(28,167)	(1,646,505)	(451,952)	(2,128,206)
Foreign exchange and other movements	(1,874)	(55)	18,760	19,203	36,034	(2,973)	4,243	(8,074)	4,812	(1,992)	(4,847)	4,188	10,686	24,015	34,042
Change in the present value of the impairment losses			(33,419)	(28,912)	(62,331)			56,676	13,373	70,049			23,257	(15,539)	7,718
Reclassification of allowance for expected credit losses to "Assets held for sale"	(2,287)	(197)	(39,731)	(2,589)	(44,804)			(956,885)	(199,576)	(1,156,461)	(2,287)	(197)	(996,616)	(202,165)	(1,201,265)
Balance 31.12.2019	**30,210**	**296,431**	**4,202,904**	**1,630,785**	**6,160,330**	**88,061**	**40,958**	**2,519,718**	**523,923**	**3,172,660**	**118,271**	**337,389**	**6,722,622**	**2,154,708**	**9,332,990**

The amounts are presented in thousands of Euro unless otherwise indicated

In the above table which presents the movement of allowance for expected credit losses for the year 2019, the amount of € 77,427 which is related to impairment losses of loans classified to assets held for sale in the previous periods is not included in “Impairment losses on loans”.

“Foreign exchange and other movements” in the movement of allowance for expected credit losses for year 2019 includes an amount of € 12,166 which relates to impairment losses of loans for which the Group, in the context of renegotiation of their terms, participated in debt to equity agreements.

During 2019, the allowance for expected credit losses have been affected by the following movements:

- Transfer to Stage 1 from Stage 2 and Stage 3 of loans amount to € 2,244,954 due to the improvement of the creditworthiness compared to their initial recognition and the improvement of macroeconomic indicators for the loans remaining in Stage 1
- The impairment losses of loans classified in Stage 3 were affected by:
  - incorporation in the calculation of the allowance for expected credit losses of sale transactions based on the Business Plan and,
  - The further deterioration of the portfolio remaining in Stage 3

Finally, loans written off in 2019 amounted to € 2,128,206 and led to an equal reduction of allowance for expected credit losses. It is noted that loans that have been written off within 2019 but can still be legally claimed amounted to € 1,994,697.

Reconciliation of letters of guarantee, letters of credit and undrawn loan commitments by IFRS 9 Stage

The movement for the years 2020 and 2019 of letters of guarantee, letters of credit and undrawn loan commitments is presented in the tables that follow:

	31.12.2020				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Balance 1.1.2020	**6,995,024**	**127,038**	**346,058**	**1,055**	**7,469,175**
Changes for the year 1.1.- 31.12.2020					
Transfers to Stage 1 from Stage 2 or 3	370,158	(353,771)	(16,387)		-
Transfers to Stage 2 from Stage 1 or 3	(727,618)	736,286	(8,668)		-
Transfers to Stage 3 from Stage 1 or 2	(8,642)	(1,808)	10,450		-
New letters of guarantee, letters of credit and undrawn loan commitments	1,148,437				1,148,437
Foreign exchange, repayments and other movements	(627,735)	(27,948)	4,769	3,404	(647,510)
Balance 31.12.2020	**7,149,624**	**479,797**	**336,222**	**4,459**	**7,970,102**
Allowance for expected credit losses	(7,618)	(9,339)	(74,522)	(3)	(91,482)
Balance 31.12.2020	**7,142,006**	**470,458**	**261,700**	**4,456**	**7,878,620**

	31.12.2019				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Balance 1.1.2019	**6,302,999**	**291,079**	**339,479**	**2,163**	**6,935,720**
Changes for the year 1.1.- 31.12.2019					
Transfers to Stage 1 from Stage 2 or 3	272,547	(264,389)	(8,158)		-
Transfers to Stage 2 from Stage 1 or 3	(120,106)	129,111	(9,005)		-
Transfers to Stage 3 from Stage 1 or 2	(23,789)	(8,038)	31,827		-
New letters of guarantees, letters of credit and undrawn loan commitments	480,418				480,418
Foreign exchange, repayments and other movements	82,955	(20,725)	(8,085)	(1,108)	53,037
Balance 31.12.2019	**6,995,024**	**127,038**	**346,058**	**1,055**	**7,469,175**
Allowance for expected credit losses	(16,026)	(2,289)	(75,118)	(7)	(93,440)
Balance 31.12.2019	**6,978,998**	**124,749**	**270,940**	**1,048**	**7,375,735**

283 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of allowance for expected credit losses of letters of guarantee, letters of credit and undrawn loan commitments by IFRS 9 Stage

The Group has recognized allowance for expected credit losses for the undrawn loan commitments, letters of credit and letters of guarantee, the reconciliation of which is presented in the following tables for the years 2020 and 2019:

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	16,026	2,289	75,118	7	93,440
Changes for the year 1.1-31.12.2020					
Transfers to stage 1 (from stage 2 or 3)	5,327	(4,031)	(1,296)		-
Transfers to stage 2 (from stage 1 or 3)	(2,702)	2,779	(77)		-
Transfers to stage 3 (from stage 1 or 2)	(112)	(220)	332		-
Net remeasurement of expected credit losses(a)	(4,294)	4,986	884		1,576
Impairment losses on new exposures (b)	3,746				3,746
Change in risk parameters (c)	(9,772)	2,956	(62)	815	(6,063)
Impairment losses (a)+(b)+(c)	**(10,320)**	**7,942**	**822**	**815**	**(741)**
Foreign exchange and other movements	(601)	580	(377)	(819)	(1,217)
Balance 31.12.2020	**7,618**	**9,339**	**74,522**	**3**	**91,482**

“Foreign exchange and other movements” includes a provision for a letter of guarantee given as collateral to cover credit risk of subsidiary that was forfeited and transferred to the other loan and advances to customers.

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	**15,176**	**3,815**	**73,069**	**161**	**92,221**
Changes for the year 1.1-31.12.2019					
Transfers to stage 1 (from stage 2 or 3)	2,893	(2,390)	(503)		-
Transfers to stage 2 (from stage 1 or 3)	(529)	582	(53)		-
Transfers to stage 3 (from stage 1 or 2)	(295)	(335)	630		-
Net remeasurement of expected credit losses(a)	(2,819)	1,209	8,376		6,766
Impairment losses on new exposures (b)	1,528				1,528
Change in risk parameters (c)	190	(633)	(6,445)	(155)	(7,043)
Impairment losses (a)+(b)+(c)	**(1,101)**	**576**	**1,931**	**(155)**	**1,251**
Foreign exchange and other movements	(118)	41	44	1	(32)
Balance 31.12.2019	**16,026**	**2,289**	**75,118**	**7**	**93,440**

284 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Advances to customers

Advances to customers derive mainly from Group's commercial activity other than lending, including mainly receivables from letters of guarantee, receivables from credit cards and other receivables from banking activities. The calculation of allowance for expected credit losses for the receivables that are exposed to credit risk, is being performed using the simplified approach, taking into account their lifetime (without being allocated into stages), as provided by IFRS 9.

The expected credit loss rate applied by the Group was determined based on the assessment of expected credit losses taking into account the time that the aforementioned receivables, which are mainly short-term, remain due.

Advances to customers as at 31.12.2020 amounted to € 314,251 (31.12.2019: € 212,500), while allowance for expected credit losses amounted to € 47,227 (31.12.2019: € 41,011).

The following tables present the reconciliation of advances to customers for the years 2020 and 2019:

Balance 1.1.2020	**212,500**
Repayments, foreign exchange and other movements	101,751
Balance 31.12.2020	**314,251**
Allowance for expected credit losses	(47,227)
Balance of advances to customers 31.12.2020	**267,024**

Balance 1.1.2019	**220,989**
Repayments, foreign exchange and other movements	(8,489)
Balance 31.12.2019	**212,500**
Allowance for expected credit losses	(41,011)
Balance of advances to customers 31.12.2019	**171,489**

The reconciliation of the allowance for expected credit losses for the years 2020 and 2019 presented in the following tables below:

Balance 1.1.2020	**41,011**
Impairment losses on advances to customers	3,385
Foreign exchange, write-offs and other movements	2,831
Balance 31.12.2020	**47,227**

Balance 1.1.2019	**31,862**
Impairment losses on advances to customers	7,883
Foreign exchange, write-offs and other movements	1,266
Balance 31.12.2019	**41,011**

285 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

PLEDGED COLLATERALS

Collaterals are received in order to mitigate credit risk that may arise from the borrower's inability to fulfill his contractual obligations.

Collaterals include all kind of assets and rights which are made available to the Group either by its borrowers or by third parties, in order to be used as complementary liquidation sources of the relevant receivables.

The breakdown of collaterals and guarantees received to reduce the credit risk exposure is summarized below:

Breakdown of collaterals and guarantees

	31.12.2020									
	Value of collateral									
	Loans measured at fair value through profit or loss (FVPL)					Loans measured at amortised cost				
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees
Retail lending						16,534,362	244,269	893,949	17,672,580	3,670,168
Corporate lending	80,620	1,850	170,378	252,848	18,134	6,471,044	981,485	6,010,043	13,462,572	4,283,157
Public sector						508	5,894	37,500	43,902	29,414
Total	**80,620**	**1,850**	**170,378**	**252,848**	**18,134**	**23,005,914**	**1,231,648**	**6,941,492**	**31,179,054**	**7,982,739**

	31.12.2019									
	Value of collaterals									
	Loans measured at fair value through profit or loss (FVPL)					Loans measured at amortised cost				
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees
Retail lending			450	450		16,548,539	212,248	821,491	17,582,278	3,854,193
Corporate lending	65,173	796	199,655	265,624	13,769	6,433,329	1,242,205	5,279,408	12,954,942	4,212,265
Public sector						512	11,911	48,385	60,808	46,617
Total	**65,173**	**796**	**200,105**	**266,074**	**13,769**	**22,982,380**	**1,466,364**	**6,149,284**	**30,598,028**	**8,113,075**

There are no cases of transfer or reassignment of collaterals received from borrowers for which an obligation to return them has been recognized.

Loan-to-value ratio (LTV)

The loan-to-value ratio of loans reflects the relationship between the loan and the value of the property held as collateral.

The table below presents the mortgage loan portfolio by LTV ratio.

	Loans measured at amortised cost	
	31.12.2020	31.12.2019
< 50%	1,575,675	1,423,102
50% - 70%	1,976,380	1,830,065
71% - 80%	1,276,882	1,196,086
81% - 90%	1,320,823	1,169,719
91% - 100%	3,041,642	3,140,359
101% - 120%	1,991,097	1,943,351
121% - 150%	1,707,335	2,021,248
> 150%	4,117,961	4,749,789
Total exposure	**17,007,795**	**17,473,719**
Simple average of LTV (%)	83%	86%

 The amounts are presented in thousands of Euro unless otherwise indicated

REPOSSESSED ASSETS

Policy of disposal of repossessed assets

Within 2018 the Group created a uniform management strategy for repossessed assets by setting up two new Committees and assigning to a group company the management of all the repossessed properties of the Bank and its subsidiaries. When the Group acquires the legal title of properties in the context of the management of non-performing exposures (NPEs), the respective company is in charge of monitoring the repossession procedures (asset on – boarding), determining the best property management strategy and assigning to the appropriate channels, within or outside the Group, the management of the properties.

Depending on the defined strategy, the property is classified for accounting purposes, in the appropriate category. The classification process is repeated periodically so that the classification of each property is updated based on its current status.

Finally, there is continuous supervision and co-ordination of collaborating asset management channels on the implementation of the defined strategies as well as of the asset commercialization in accordance with the Group's policy and monitoring of their performance through appropriate Key Performance Indicators (KPIs).

Repossessed assets

	31.12.2020						
	Balance					Disposals during the year	
	Value of collaterals repossessed 31.12.2020	Of which in 2020	Accumulated impairment 31.12.2020	Of which in 2020	Net carrying amount of collaterals repossessed 31.12.2020	Net disposal value	Net gain/ (loss) on disposal
Real estate collaterals	1,178,328	188,205	238,727	32,711	939,601	55,505	5,433
Other collaterals	7,140				7,140		90

	31.12.2019						
	Balance					Disposals during the year	
	Value of collaterals repossessed 31.12.2019	Of which in 2019	Accumulated impairment 31.12.2019	Of which in 2019	Net carrying amount of collaterals repossessed 31.12.2019	Net disposal value	Net gain/ (loss) on disposal
Real estate collaterals	1,042,464	219,345	228,154	11,097	814,310	152,114	17,094
Other collaterals	4,778	569			4,778	3,254	12

The net carrying amount of the collaterals repossessed as of 31.12.2020, includes an amount of € 46,542 (31.12.2019: € 64,673) that relates to properties that were classified as "Assets held for sale".

287 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Loans and allowance for expected credit losses by IFRS 9 Stage, industry and geographical region

	31.12.2020							
	Greece							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	-	5,704,489	3,998,989	9,107,678	4,805,983	23,617,139	5,537,504	18,079,635
Mortgage		3,831,344	2,574,174	4,637,625	2,736,186	13,779,329	2,068,240	11,711,089
Consumer		494,909	428,935	1,628,399	1,152,762	3,705,005	1,592,970	2,112,035
Credit cards		731,278	149,663	221,068	43,633	1,145,642	209,827	935,815
Small Businesses		646,958	846,217	2,620,586	873,402	4,987,163	1,666,467	3,320,696
Corporate lending	126,298	10,020,564	1,032,828	4,148,690	764,436	15,966,518	2,496,304	13,470,214
Financial institutions and other financial services		77,073	1,826	4,360	4,920	88,179	7,862	80,317
Manufacturing	16,520	3,784,496	250,232	1,178,988	232,450	5,446,166	757,326	4,688,840
Construction and real estate	53,934	1,152,093	202,992	612,179	95,612	2,062,876	362,681	1,700,195
Wholesale and retail trade	4,826	1,997,244	131,854	1,545,271	209,182	3,883,551	924,636	2,958,915
Transportation		583,675	68,420	73,000	8,742	733,837	48,343	685,494
Shipping	50,485	54,087	21,789	13,561	24,751	114,188	4,039	110,149
Hotels-Tourism		1,422,030	256,049	335,837	35,264	2,049,180	120,155	1,929,025
Services and other sectors	533	949,866	99,666	385,494	153,515	1,588,541	271,262	1,317,279
Public sector		43,044	146	1,804	59	45,053	1,053	44,000
Total	126,298	15,768,097	5,031,963	13,258,172	5,570,478	39,628,710	8,034,861	31,593,849

	31.12.2020							
	Other Countries							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	-	1,719,427	430,908	1,402,767	259,597	3,812,699	919,285	2,893,414
Mortgage		1,474,946	355,423	1,191,777	206,320	3,228,466	760,016	2,468,450
Consumer		207,728	63,795	165,911	44,106	481,540	127,400	354,140
Credit cards		23,162	4,926	9,056	20	37,164	8,748	28,416
Small Businesses		13,591	6,764	36,023	9,151	65,529	23,121	42,408
Corporate lending	154,584	2,972,497	757,719	903,306	292,631	4,926,153	657,259	4,268,894
Financial institutions and other financial services		70,613	5,657	13,202	2,094	91,566	3,877	87,689
Manufacturing		154,392	33,675	30,604	1,656	220,327	17,420	202,907
Construction and real estate	19,111	662,921	362,713	603,359	211,881	1,840,874	430,913	1,409,961
Wholesale and retail trade		232,183	54,501	96,157	16,594	399,435	58,623	340,812
Transportation	29,250	138,110	47,089	25,132	149	210,480	21,617	188,863
Shipping	106,223	1,577,979	136,500	68,644	8,594	1,791,717	42,226	1,749,491
Hotels-Tourism		26,035	69,923	21,911	28,831	146,700	23,207	123,493
Services and other sectors		110,264	47,661	44,297	22,832	225,054	59,376	165,678
Public sector		35,830	339			36,169	230	35,939
Total	154,584	4,727,754	1,188,966	2,306,073	552,228	8,775,021	1,576,774	7,198,247

 The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019							
	Greece							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**450**	**5,864,421**	**3,737,542**	**9,525,648**	**4,910,637**	**24,038,248**	**5,230,788**	**18,807,460**
Mortgage		4,004,188	2,549,525	4,858,806	2,806,693	14,219,212	1,947,547	12,271,665
Consumer	450	510,795	381,229	1,690,310	1,179,630	3,761,964	1,486,883	2,275,081
Credit cards		894,235	113,536	229,291	46,585	1,283,647	193,860	1,089,787
Small Businesses		455,203	693,252	2,747,241	877,729	4,773,425	1,602,498	3,170,927
Corporate lending	**122,238**	**9,466,749**	**575,966**	**4,145,249**	**759,704**	**14,947,668**	**2,452,181**	**12,495,487**
Financial institutions and other financial services		78,592	4,089	4,196	4,796	91,673	7,027	84,646
Manufacturing	15,961	3,648,355	83,064	1,206,711	232,790	5,170,920	752,516	4,418,404
Construction and real estate	52,125	1,382,757	186,976	637,896	91,983	2,299,612	400,809	1,898,803
Wholesale and retail trade	5,123	1,769,639	51,060	1,509,281	195,600	3,525,580	885,019	2,640,561
Transportation		318,091	5,187	68,792	26,026	418,096	43,072	375,024
Shipping	48,442	31,935	18,520	11,049	25,075	86,579	3,484	83,095
Hotels-Tourism		1,265,991	115,903	325,967	30,774	1,738,635	113,303	1,625,332
Services and other sectors	587	971,389	111,167	381,357	152,660	1,616,573	246,951	1,369,622
Public sector		**53,839**	**14**	**1,799**	**3,088**	**58,740**	**858**	**57,882**
Total	**122,688**	**15,385,009**	**4,313,522**	**13,672,696**	**5,673,429**	**39,044,656**	**7,683,827**	**31,360,829**

	31.12.2019							
	Other Countries							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending		**1,667,299**	**400,921**	**1,523,742**	**266,165**	**3,858,127**	**929,542**	**2,928,585**
Mortgage		1,406,685	328,403	1,308,805	210,614	3,254,507	778,443	2,476,064
Consumer		218,417	60,718	169,865	46,728	495,728	123,336	372,392
Credit cards		26,721	5,105	8,435	22	40,283	6,578	33,705
Small Businesses		15,476	6,695	36,637	8,801	67,609	21,185	46,424
Corporate lending	**184,448**	**3,204,528**	**635,188**	**1,024,360**	**305,864**	**5,169,940**	**719,355**	**4,450,585**
Financial institutions and other financial services		93,511	16,823	6,489	1,341	118,164	5,103	113,061
Manufacturing	8,887	199,011	29,883	38,504	1,680	269,078	25,040	244,038
Construction and real estate	18,859	862,262	240,852	720,650	207,982	2,031,746	472,097	1,559,649
Wholesale and retail trade		232,042	51,791	118,449	15,275	417,557	69,374	348,183
Transportation	31,872	147,750	89,781	8,407	161	246,099	6,481	239,618
Shipping	124,830	1,492,343	138,543	29,955	9,046	1,669,887	33,936	1,635,951
Hotels-Tourism		60,484	22,355	34,996	40,338	158,173	26,091	132,082
Services and other sectors		117,125	45,160	66,910	30,041	259,236	81,233	178,003
Public sector		**47,457**	**454**	**-**	**-**	**47,911**	**266**	**47,645**
Total	**184,448**	**4,919,284**	**1,036,563**	**2,548,102**	**572,029**	**9,075,978**	**1,649,163**	**7,426,815**

289 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Interest income from loans by loan category and IFRS 9 stage

The following tables present the interest income from loans for the year 2020 and 2019 by IFRS 9 Stage.

For loans classified in Stages 1 and 2, interest income is calculated by applying the effective interest rate to the gross carrying amount of the loan.

For loans classified in Stage 3, interest income is calculated by applying the effective interest rate on the amortised cost of the loan (i.e. gross carrying amount after allowance for expected credit losses), while for Purchased or Originated Credit Impaired loans (POCI) interest income is calculated by applying the adjusted effective interest rate to the amortised cost of the loan.

	31.12.2020					
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total interest income	
Retail lending	296,704	152,969	296,165	131,227	877,065	26
Corporate lending	491,887	52,627	118,789	31,948	695,251	12,994
Public sector	1,258	15	61	78	1,412	
Total interest income	**789,849**	**205,611**	**415,015**	**163,253**	**1,573,728**	**13,020**

	31.12.2019					
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total interest income	
Retail lending	316,959	149,760	330,044	139,914	936,677	65
Corporate lending	531,659	57,613	128,302	33,574	751,148	13,386
Public sector	1,429	38	67	24	1,558	
Total interest income	**850,047**	**207,411**	**458,413**	**173,512**	**1,689,383**	**13,451**

290 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

FORBORNE LOANS

The restructuring of loans is performed through renegotiation of the original contractual terms and include changes such as:

- Extension of the credit duration
- Write-off of a portion of borrower's amounts due
- Grace period for the principal and/or interest
- Decrease in interest rates

As a rule forbearance measures which are extended include a combination of the above amendments to the contractual terms.

In addition, in the context of renegotiations of the terms of loans granted, the Group has participated in agreements for the exchange of debt with borrowers' equity shares. As at 31.12.2020, the Group included in the portfolio measured at fair value through other comprehensive income shares with a fair value of € 6,233 (31.12.2019: € 4,730) which were acquired from respective transactions. The share that had been classified in the "Assets held for sale" in the previous years relates to the company "Forthnet" while during the current year no classification to the abovementioned caption exists (note 48).

Analysis of forborne loans by type of forbearance measure

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	**Loans measured at amortised cost**	**Total**
Interest only payment		158,199	158,199
Reduced payments scheme	5,224	2,733,491	2,738,715
Grace period	483	431,482	431,965
Loan term extension	57,676	4,272,984	4,330,660
Arrears capitalization	48,696	1,917,748	1,966,444
Partial write-off in borrower's obligations	1,789	1,221,315	1,223,104
Debt for equity transactions		15,285	15,285
Other	4,836	708,916	713,752
Total net carrying amount	**118,704**	**11,459,420**	**11,578,124**

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	**Loans measured at amortised cost**	**Total**
Interest only payment		132,422	132,422
Reduced payments scheme		3,473,931	3,473,931
Grace period	857	443,328	444,185
Loan term extension	66,317	4,807,104	4,873,421
Arrears capitalization		1,980,100	1,980,100
Partial write-off in borrower's obligations	48,442	989,415	1,037,857
Debt for equity transactions		21,221	21,221
Other	7,739	618,119	625,858
Total net carrying amount	**123,355**	**12,465,640**	**12,588,995**

291 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Forborne loans by product line

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Retail lending	-	9,059,672	9,059,672
Mortgage		6,103,677	6,103,677
Consumer		1,326,308	1,326,308
Credit cards		81,351	81,351
Small Businesses		1,548,336	1,548,336
Corporate lending	118,704	2,399,019	2,517,723
Large corporate	113,639	1,469,330	1,582,969
SME's	5,065	929,689	934,754
Public sector	-	729	729
Greece		729	729
Total net carrying amount	118,704	11,459,420	11,578,124

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Retail lending	-	9,762,583	9,762,583
Mortgage		6,548,619	6,548,619
Consumer		1,479,362	1,479,362
Credit cards		118,419	118,419
Small Businesses		1,616,183	1,616,183
Corporate lending	123,355	2,699,278	2,822,633
Large corporate	117,646	1,711,136	1,828,782
SME's	5,709	988,142	993,851
Public sector		3,779	3,779
Greece		3,779	3,779
Total net carrying amount	123,355	12,465,640	12,588,995

Forborne loans by geographical region

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Greece	55,550	10,255,774	10,311,324
Other Countries	63,154	1,203,646	1,266,800
Total net carrying amount	118,704	11,459,420	11,578,124

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Greece	54,151	11,123,400	11,177,551
Other Countries	69,204	1,342,240	1,411,444
Total net carrying amount	123,355	12,465,640	12,588,995

The amounts are presented in thousands of Euro unless otherwise indicated

Forborne loans according to their credit quality

	31.12.2020		
	Total amount of Loans	**Total amount of Forborne Loans**	**Percentage of Forborne Loans (%)**
Loans measured at fair value through profit or loss (FVPL)			
Past due	80,480	70,994	88
Not past due	200,402	47,710	24
Total net carrying amount	**280,882**	**118,704**	**42**
Value of collaterals	252,848	111,137	44
Loans measured at amortised cost			
Stage 1	20,495,851		
Stage 2	6,220,929	3,322,367	53
Stage 3	15,564,245	9,412,903	60
Purchased or originated credit impaired (POCI)	6,122,706	3,827,887	63
Carrying amount (before allowance for expected credit losses)	**48,403,731**	**16,563,157**	**34**
Stage 1 - Allowance for expected credit losses	95,561		
Stage 2 - Allowance for expected credit losses	341,767	225,871	66
Stage 3 - Allowance for expected credit losses	6,970,307	3,695,975	53
Allowance for expected credit losses for purchased or originated credit impaired loans (POCI)	2,204,000	1,181,891	54
Total net carrying amount	**38,792,096**	**11,459,420**	**30**
Value of collaterals	31,179,054	10,305,395	33

	31.12.2019		
	Total amount of Loans	**Total amount of Forborne Loans**	**Percentage of Forborne Loans (%)**
Loans measured at fair value through profit or loss (FVPL)			
Past due	149,695	107,971	72
Not past due	157,441	15,384	10
Total net carrying amount	**307,136**	**123,355**	**40**
Value of collaterals	266,074	116,924	44
Loans measured at amortised cost			
Stage 1	20,304,293		
Stage 2	5,350,085	3,686,868	69
Stage 3	16,220,798	9,730,532	60
Purchased or originated credit impaired (POCI)	6,245,458	3,816,663	61
Carrying amount (before allowance for expected credit losses)	**48,120,634**	**17,234,063**	**36**
Stage 1 - Allowance for expected credit losses	(118,271)		
Stage 2 - Allowance for expected credit losses	(337,389)	(237,645)	70
Stage 3 - Allowance for expected credit losses	(6,722,622)	(3,459,093)	51
Allowance for expected credit losses for purchased or originated credit impaired loans (POCI)	(2,154,708)	(1,071,685)	50
Total net carrying amount	**38,787,644**	**12,465,640**	**32**
Value of collaterals	30,598,028	10,520,136	34

293 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of the net value of forborne loans

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Balance 1.1.2020	123,355	12,465,640	12,588,995
Changes for the year 1.1-31.12.2020			
Forbearance measures during the year	11,052	771,090	782,142
Interest income	5,955	421,924	427,879
Repayment of loans (partial or total)	(13,569)	(545,447)	(559,016)
Loans that exited forbearance status during the year		(923,362)	(923,362)
Impairment losses		(726,922)	(726,922)
Disposal of forborne loans			
Remeasurment of fair value	(9,106)		(9,106)
Reclassification of loans to "Assets held for sale"			-
Other movements	1,017	(3,503)	(2,486)
Balance 31.12.2020	118,704	11,459,420	11,578,124

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Balance 1.1.2019	76,678	13,245,856	13,322,534
Changes for the year 1.1-31.12.2019			
Forbearance measures during the year	73,952	1,480,362	1,554,314
Interest income	3,819	459,042	462,861
Repayment of loans (partial or total)	(7,591)	(669,200)	(676,791)
Loans that exited forbearance status during the year		(1,372,071)	(1,372,071)
Impairment losses		(359,018)	(359,018)
Disposal of forborne loans		(24,982)	(24,982)
Remeasurment of fair value	(23,503)		(23,503)
Reclassification of loans to "Assets held for sale"		(187,586)	(187,586)
Other movements		(106,763)	(106,763)
Balance 31.12.2019	123,355	12,465,640	12,588,995

294 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ANALYSIS PER RATING

Other financial instruments subject to credit risk

The following table presents the other financial instruments measured at amortised cost and at fair value through other comprehensive income as at 31.12.2020 and 31.12.2019 by IFRS 9 Stage and credit rating:

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balances with central Banks					
AAA					-
AA+ to AA-					-
A+ to A-					-
BBB+ to BBB-	602,348				602,348
Lower than BBB-	6,474,752				6,474,752
Unrated					
Carrying amount (before allowance for expected credit losses)	**7,077,100**	**-**	**-**	**-**	**7,077,100**
Allowance for expected credit losses					
Net carrying amount	**7,077,100**	**-**	**-**	**-**	**7,077,100**
Value of collaterals					-
Due from Banks					
AAA					-
AA+ to AA-	788,005				788,005
A+ to A-	757,481				757,481
BBB+ to BBB-	1,075,296				1,075,296
Lower than BBB-	17,049				17,049
Unrated	103,843		69,961		173,804
Carrying amount (before allowance for expected credit losses)	**2,741,674**	**-**	**69,961**	**-**	**2,811,635**
Allowance for expected credit losses	(127)		(69,961)		(70,088)
Net carrying amount	**2,741,547**	**-**	**-**	**-**	**2,741,547**
Value of collaterals					-
Securities measured at fair value through other comprehensive income					
AAA	188,255				188,255
AA+ to AA-	619,567				619,567
A+ to A-	477,941				477,941
BBB+ to BBB-	1,741,263				1,741,263
Lower than BBB-	3,333,644	2,104			3,335,748
Unrated	152,408	31,540			183,948
Carrying amount (before allowance for expected credit losses)	**6,513,078**	**33,644**		**-**	**6,546,722**
Allowance for expected credit losses	(15,042)	(869)			(16,911)
Net carrying amount	**6,498,036**	**32,775**	**-**	**-**	**6,530,811**
Value of collaterals					-
Securities measured at amortized cost					
AAA					-
AA+ to AA-	30,700				30,700
A+ to A-	5,622				5,622
BBB+ to BBB-	373,577				373,577
Lower than BBB-	2,930,752				2,930,752
Unrated	4,050	1,363			5,413
Carrying amount (before allowance for expected credit losses)	**3,344,701**	**1,363**	**-**	**-**	**3,346,064**
Allowance for expected credit losses	(10,324)	(7)			(10,331)
Net carrying amount	**3,334,377**	**1,356**	**-**	**-**	**3,335,733**
Value of collaterals					-

295 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balances with central Banks					
AAA					-
AA+ to AA-					-
A+ to A-					-
BBB+ to BBB-	669,736				669,736
Lower than BBB-	920,200				920,200
Unrated					-
Carrying amount (before allowance for expected credit losses)	**1,589,936**	**-**	**-**	**-**	**1,589,936**
Allowance for expected credit losses					-
Net carrying amount	**1,589,936**	**-**	**-**	**-**	**1,589,936**
Value of collaterals					-
Due from Banks					
AAA					-
AA+ to AA-	782,586				782,586
A+ to A-	1,680,493				1,680,493
BBB+ to BBB-	793,057				793,057
Lower than BBB-	25,519				25,519
Unrated	51,166		69,961		121,126
Carrying amount (before allowance for expected credit losses)	**3,332,821**	**-**	**69,961**	**-**	**3,402,782**
Allowance for expected credit losses	(131)		(69,961)		(70,092)
Net carrying amount	**3,332,690**	**-**	**-**	**-**	**3,332,690**
Value of collaterals					-
Securities measured at fair value through other comprehensive income					
AAA	47,408				47,408
AA+ to AA-	571,944				571,944
A+ to A-	243,567				243,567
BBB+ to BBB-	1,991,455				1,991,455
Lower than BBB-	4,477,414				4,477,414
Unrated	159,912	1,302			161,214
Carrying amount (before allowance for expected credit losses)	**7,491,700**	**1,302**	**-**	**-**	**7,493,002**
Allowance for expected credit losses	(25,774)	(64)			(25,838)
Net carrying amount	**7,465,926**	**1,238**	**-**	**-**	**7,467,164**
Value of collaterals					-
Securities measured at amortized cost					
AAA					-
AA+ to AA-					-
A+ to A-					-
BBB+ to BBB-					-
Lower than BBB-	1,078,143				1,078,143
Unrated					-
Carrying amount (before allowance for expected credit losses)	**1,078,143**	**-**	**-**	**-**	**1,078,143**
Allowance for expected credit losses	(7,413)				(7,413)
Net carrying amount	**1,070,730**	**-**	**-**	**-**	**1,070,730**
Value of collaterals					-

 The amounts are presented in thousands of Euro unless otherwise indicated

Trading portfolio - Derivative financial assets - Securities measured at fair value through profit or loss

The following table presents the other financial instruments measured through profit or loss per credit rating.

	2020	2019
Trading securities		
AAA		
AA+ to AA-		
A+ to A-		
BBB+ to BBB-		
Lower than BBB-	29,154	17,490
Unrated		371
Net carrying amount	**29,154**	**17,861**
Value of collaterals		
Derivative financial assets		
AAA		
AA+ to AA-	106,467	3,262
A+ to A-	107,482	239,535
BBB+ to BBB-	16,862	13,004
Lower than BBB-	1,033,609	749,521
Unrated	2,662	3,871
Net carrying amount	**1,267,082.00**	**1,009,193**
Value of collaterals		
Securities measured at fair value through profit or loss		
AAA		
AA+ to AA-		9,025
A+ to A-		
BBB+ to BBB-	835	
Lower than BBB-		
Unrated	12,408	13,556
Net carrying amount	**13,243**	**22,581**
Value of collaterals		

297 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ANALYSIS OF FINANCIAL ASSETS PER IFRS 9 STAGE

Due from Banks

The following table presents the classification of Due from Banks per IFRS 9 Stage as of 31.12.2020 and 31.12.2019.

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 31.12.2020					
Carrying amount (before allowance for expected credit losses)	2,741,674		69,961		2,811,635
Allowance for expected credit losses	(127)		(69,961)		(70,088)
Net carrying amount	**2,741,547**	**-**	**-**	**-**	**2,741,547**

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 31.12.2019					
Carrying amount (before allowance for expected credit losses)	3,332,821		69,961		3,402,782
Allowance for expected credit losses	(131)		(69,961)		(70,092)
Net carrying amount	**3,332,690**	**-**	**-**	**-**	**3,332,690**

298 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Investment securities

i. Investment securities measured at fair value through other comprehensive income

The following table presents the classification of securities per IFRS 9 Stage and issuer's category as of 31.12.2020 and 31.12.2019:

	31.12.2020				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Greek Government Bonds					
Allowance for expected credit losses	(6,312)				(6,312)
Fair value	2,771,014				2,771,014
Other Government Bonds					
Allowance for expected credit losses	(856)				(856)
Fair value	1,848,207				1,848,207
Other securities					
Allowance for expected credit losses	(7,874)	(869)			(8,743)
Fair value	1,878,814	32,776			1,911,590
Total securities measured at fair value through other comprehensive income					
Allowance for expected credit losses	**(15,042)**	**(869)**	**-**	**-**	**(15,911)**
Fair value	**6,498,035**	**32,776**	**-**	**-**	**6,530,811**

	31.12.2019				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Greek Government Bonds					
Allowance for expected credit losses	(21,064)				(21,064)
Fair value	3,980,339				3,980,339
Other Government Bonds					
Allowance for expected credit losses	(1,112)				(1,112)
Fair value	1,981,294				1,981,294
Other securities					
Allowance for expected credit losses	(3,598)	(64)			(3,662)
Fair value	1,504,293	1,238			1,505,531
Total securities measured at fair value through other comprehensive income					
Allowance for expected credit losses	**(25,774)**	**(64)**	**-**	**-**	**(25,838)**
Fair value	**7,465,926**	**1,238**	**-**	**-**	**7,467,164**

Except from the above securities, in the portfolio of investment securities measured at fair value through other comprehensive income, shares measured at fair value of € 46,887 (31.12.2019: € € 52,766) are also included.

The amounts are presented in thousands of Euro unless otherwise indicated

ii. Investment securities measured at amortized cost

The following table presents the classification of securities per IFRS 9 Stage and issuer's category as of 31.12.2020 and 31.12.2019:

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Greek Government bonds					
Carrying amount (before allowance for expected credit losses)	2,788,311				2,788,311
Allowance for expected credit losses	(9,132)				(9,132)
Net value	**2,779,179**	**-**	**-**	**-**	**2,779,179**
Other Government bonds					
Carrying amount (before allowance for expected credit losses)	494,974				494,974
Allowance for expected credit losses	(146)				(146)
Net value	**494,828**	**-**	**-**	**-**	**494,828**
Other securities					
Carrying amount (before allowance for expected credit losses)	61,417	1,363			62,780
Allowance for expected credit losses	(1,047)	(7)			(1,054)
Net value	**60,370**	**1,356**			**61,726**
Total securities measured at amortized cost					
Carrying amount (before allowance for expected credit losses)	**3,344,702**	**1,363**			**3,346,065**
Allowance for expected credit losses	**(10,325)**	**(7)**			**(10,332)**
Net value	**3,334,377**	**1,356**			**3,335,733**

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Greek Government bonds					
Carrying amount (before allowance for expected credit losses)	1,078,143				1,078,143
Allowance for expected credit losses	(7,413)				(7,413)
Net value	**1,070,730**				**1,070,730**
Total securities measured at amortized cost					
Carrying amount (before allowance for expected credit losses)	**1,078,143**				**1,078,143**
Allowance for expected credit losses	**(7,413)**				**(7,413)**
Net value	**1,070,730**				**1,070,730**

300 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of other financial assets (except loans) before allowance for expected credit losses per IFRS 9 Stage

The table below presents the movement of the carrying amount before allowance for expected credit losses of due from banks, the movement of the fair value of investment securities at fair value through other comprehensive income and securities measured at amortized cost including the allowance for expected credit losses by IFRS 9 Stage.

	31.12.2020									
	Due from banks					Investment securities measured at fair value through other comprehensive income				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	3,332,821	-	69,961	-	3,402,782	7,465,926	1,238	-	-	7,467,164
Changes for the year 1.1-31.12.2020										
Transfers to Stage 1 from Stage 2 or 3						1,226	(1,226)			
Transfers to Stage 2 from Stage 1 or 3						(32,598)	32,598			-
Transfers to Stage 3 from Stage 1 or 2										-
New financial assets originated	6,021,763				6,021,763	3,766,573				3,766,573
Derecognition of financial assets						(3,445,384)	(742)			(3,446,126)
Interest on carrying amount before impairment	79				79	108,586	281			108,867
Changes due to modifications that did not result in derecognition										-
Write-off										-
Repayments, foreign exchange differences and other movements	(6,612,989)				(6,612,989)	(1,366,294)	627			(1,365,667)
Balance 31.12.2020	2,741,674	-	69,961	-	2,811,635	6,498,035	32,776	-	-	6,530,811

301 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019										
	Due from banks					**Investment securities measured at fair value through other comprehensive income**				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Balance 1.1.2019	**2,500,656**	**-**	**69,961**	**-**	**2,570,617**	**6,847,137**	**8,916**	**-**	**-**	**6,856,053**
Changes for the year 1.1-31.12.2019										
Transfers to Stage 1 from Stage 2 or 3										
Transfers to Stage 2 from Stage 1 or 3						(1,403)	1,403			-
Transfers to Stage 3 from Stage 1 or 2										-
New financial assets originated	4,836,056				**4,836,056**	5,851,475				**5,851,475**
Derecognition of financial assets						(4,045,604)	(1,313)			**(4,046,917)**
Interest on carrying amount before impairment	578				**578**	161,670	286			**161,956**
Changes due to modifications that did not result in derecognition										-
Write-off										-
Repayments, foreign exchange differences and other movements	(4,004,469)				**(4,004,469)**	(1,347,349)	(8,054)			**(1,355,403)**
Balance 31.12.2019	**3,332,821**	**-**	**69,961**	**-**	**3,402,782**	**7,465,926**	**1,238**	**-**	**-**	**7,467,164**

31.12.2020					
	Investment securities measured at amortized cost				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired (POCI)**	**Total**
Balance 1.1.2020	**1,078,143**	**-**	**-**	**-**	**1,078,143**
Changes for the year 1.1-31.12.2020					
Transfers to Stage 1 from Stage 2 or 3					-
Transfers to Stage 2 from Stage 1 or 3	(1,349)	1,349			-
Transfers to Stage 3 from Stage 1 or 2					-
New financial assets originated	4,197,398				4,197,398
Derecognition of financial assets	(1,924,002)				(1,924,002)
Interest on carrying amount before impairment	39,453	14			39,467
Changes due to modifications that did not result in derecognition					-
Write-off					-
Repayments and other movements	(44,941)				(44,941)
Balance 31.12.2020	**3,344,702**	**1,363**	**-**	**-**	**3,346,065**

302 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019					
	Investment securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019					-
Changes for the year 1.1-31.12.2019					
Transfers to Stage 1 from Stage 2 or 3					-
Transfers to Stage 2 from Stage 1 or 3					-
Transfers to Stage 3 from Stage 1 or 2					-
New financial assets originated	1,074,258				1,074,258
Derecognition of financial assets					-
Interest on carrying amount before impairment	3,972				3,972
Changes due to modifications that did not result in derecognition					-
Write-off					-
Repayments and other movements	(87)				(87)
Balance 31.12.2019	**1,078,143**	**-**	**-**	**-**	**1,078,143**

Reconciliation of the allowance for expected credit losses

The tables below present the movement of the allowance for expected credit losses of Due from banks, Investment securities measured at fair value through other comprehensive income and Investment securities measured at amortized cost per IFRS 9 stage.

31.12.2020										
	Due from banks					Investment securities measured at fair value through other comprehensive income				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	131	-	69,961	-	70,092	25,774	64	-	-	25,838
Changes for the year 1.1-31.12.2020										
Transfers to Stage 1 from Stage 2 or 3						58	(58)			-
Transfers to Stage 2 from Stage 1 or 3						(53)	53			-
Transfers to Stage 3 from Stage 1 or 2										-
Net measurement of expected credit losses (a)						(46)	598			552
Impaiment losses on new receivables/ securities (b)	14				14	8,106	22			8,128
Change in credit risk parameters (c)	(17)				(17)	(4,488)	197			(4,291)
Impairment losses on receivables/ securities (a)+(b)+(c)	(3)				(3)	3,572	817	-	-	4,389
Derecognition of financial assets						(14,213)	(7)			(14,220)
Foreign exchange and other movements	(1)				(1)	(96)				(96)
Balance 31.12.2020	127		69,961		70,088	15,042	869	-	-	15,911

303 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019										
	Due from banks					Investment securities measured at fair value through other comprehensive income				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	**164**	**-**	**69,961**	**-**	**70,125**	**57,233**	**241**	**-**	**-**	**57,474**
Changes for the year 1.1-31.12.2019										
Transfers to Stage 1 from Stage 2 or 3										-
Transfers to Stage 2 from Stage 1 or 3						(8)	8			-
Transfers to Stage 3 from Stage 1 or 2										-
Net measurement of expected credit losses (a)							93			**93**
Impairment losses on new receivables/ securities (b)	114				**114**	17,734				**17,734**
Change in credit risk parameters (c)	(240)				**(240)**	(29,081)	(250)			**(29,331)**
Impairment losses on receivables/ securities (a)+(b)+(c)	**(126)**	**-**	**-**	**-**	**(126)**	**(11,347)**	**(157)**	**-**	**-**	**(11,504)**
Derecognition of financial assets						(20,112)	(28)			**(20,140)**
Foreign exchange and other movements	93				**93**	8				**8**
Balance 31.12.2019	**131**	**-**	**69,961**	**-**	**70,092**	**25,774**	**64**	**-**	**-**	**25,838**

An additional increase of allowance for expected credit losses of € 92 (31.12.2019: € 172 an additional decrease) has been recognized in the income statement of 2020 in Stage 1, which corresponds to the change of allowance for expected credit losses between the opening and the closing date resulting from the disposal of securities of FVOCI portfolio which has been agreed but not settled between these two dates. The aforementioned allowance for expected credit losses, depending on the securities valuation, is recognized in "Other assets" or "Other liabilities".

304 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2020				
	Investment securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	**7,413**	**-**	**-**	**-**	**7,413**
Changes for the year 1.1-31.12.2020					
Transfers to Stage 1 from Stage 2 or 3					-
Transfers to Stage 2 from Stage 1 or 3	(2)	2			-
Transfers to Stage 3 from Stage 1 or 2					-
Net measurement of expected credit losses (a)					-
Impairment losses on new securities (b)	9,343				9,343
Change in credit risk parameters (c)	(408)	(3)			(411)
Impairment losses on securities (a)+(b)+(c)	**8,935**	**5**	**-**	**-**	**8,940**
Derecognition of financial assets	(6,021)				(6,021)
Foreign exchange and other movements					-
Balance 31.12.2020	**10,325**	**7**	**-**	**-**	**10,332**

	31.12.2019				
	Investment securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	**-**	**-**	**-**	**-**	**-**
Changes for the year 1.1-31.12.2019					
Transfers to Stage 1 from Stage 2 or 3					-
Transfers to Stage 2 from Stage 1 or 3					-
Transfers to Stage 3 from Stage 1 or 2					-
Net measurement of expected credit losses (a)					-
Impairment losses on new securities (b)	7,413				7,413
Change in credit risk parameters (c)					-
Impairment losses on securities (a)+(b)+(c)	**7,413**	**-**	**-**	**-**	**7,413**
Derecognition of financial assets					-
Foreign exchange and other movements					-
Balance 31.12.2019	**7,413**	**-**	**-**	**-**	**7,413**

305 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following tables present the financial instruments exposed to credit risk by sectors of the counterparties

FINANCIAL ASSETS EXPOSED TO CREDIT RISK - ANALYSIS BY INDUSTRY SECTOR

	31.12.2020										
	Financial Institutions and other financial services	**Manufacturing**	**Construction and Real estate**	**Wholesale and retail trade**	**Public sector/ Goverment Securities/ Derivatives**	**Transportation**	**Shipping**	**Hotels-Tourism**	**Services and other sectors**	**Retail lending**	**Total**
Credit risk of exposures relating to balance sheet items:											
Balances with Central Banks	7,077,100										7,077,100
Due from banks	2,811,635										2,811,635
Loans and advances to customers	179,745	5,683,013	3,976,795	4,287,812	81,222	973,567	2,062,613	2,195,880	2,094,066	27,504,151	49,038,864
Derivative financial assets	225,770	29,302	86,839	2,125	860,878	58,028	1,771	1,558	812		1,267,083
Trading securities					29,154						29,154
Securities measured at fair value through other comprehensive income	1,270,479	331,985	23,069	89,407	4,626,389				205,395		6,546,724
Securities measured at amortized cost	19,505	23,215			3,283,284				20,061		3,346,065
Securities measured at fair value through profit or loss	12,545			698							13,243
Assets held for sale – Loans Portfolio	142	211,783	58,190	267,840		16,310	3,510	9,702	25,438	9,550	602,465
Total amount of balance sheet items exposed to credit risk (a)	**11,596,921**	**6,279,298**	**4,144,893**	**4,647,882**	**8,880,927**	**1,047,905**	**2,067,894**	**2,207,140**	**2,345,772**	**27,513,701**	**70,732,333**
Other balance sheet items not exposed to credit risk	9,881,100	2,695	5,932	3				11,000	18,714		9,919,444
Total assets	**21,478,021**	**6,281,993**	**4,150,825**	**4,647,885**	**8,880,927**	**1,047,905**	**2,067,894**	**2,218,140**	**2,364,486**	**27,513,701**	**80,651,777**
Credit risk of exposures relating to off-balance sheet items:											
Letters of guarantee, letters of credit and other guarantees	612,957	572,577	1,040,434	580,641	191,972	65,432	11,272	63,436	283,109	75,375	3,497,205
Undrawn loan commitments	12,979	1,023,930	239,641	947,258	2,117	57,313	4,958	91,508	200,772	1,892,421	4,472,897
Total amount of off-balance sheet items exposed to credit risk (b)	**625,936**	**1,596,508**	**1,280,076**	**1,527,898**	**194,089**	**122,745**	**16,230**	**154,944**	**483,880**	**1,967,796**	**7,970,102**
Total credit risk exposures (a+b)	**12.222.857**	**7.875.806**	**5.424.969**	**6.175.780**	**9.075.016**	**1.170.650**	**2.084.124**	**2.362.084**	**2.829.652**	**29.481.497**	**78.702.435**

306 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019										
	Financial Institutions and other financial services	**Manufacturing**	**Construction and Real estate**	**Wholesale and retail trade**	**Public sector/ Goverment securities/ Derivatives**	**Transportation**	**Shipping**	**Hotels-Tourism**	**Services and other sectors**	**Retail lending**	**Total**
Credit risk of exposures relating to balance sheet items:											
Balances with Central Banks	1,589,936										1,589,936
Due from banks	3,402,782										3,402,782
Loans and advances to customers	209,837	5,464,848	4,454,371	3,948,260	106,651	696,066	1,929,906	1,896,807	1,945,144	27,988,380	48,640,270
Derivative financial assets	179,325	11,679	154,026	496	658,048	676	944	1,622	2,371	6	1,009,193
Trading securities	371				17,490						17,861
Securities measured at fair value through other comprehensive income	1,047,284	234,480	11,972	83,468	5,983,809				131,989		7,493,002
Securities measured at amortized cost					1,078,143						1,078,143
Securities measured at fair value through profit or loss	12,530			1,026	9,025						22,581
Assets held for sale – Loans Portfolio	1,814	438,581	258,493		692,943	18,296	3,394	80,563	186,447	64,380	1,744,911
Total amount of balance sheet items exposed to credit risk (a)	**6,443,879**	**6,149,588**	**4,878,862**	**4,033,250**	**8,546,109**	**715,038**	**1,934,244**	**1,978,992**	**2,265,951**	**28,052,766**	**64,998,679**
Other balance sheet items not exposed to credit risk	548,717	1,528	142,978	3				2,200	8,933,444		9,628,870
Total assets	**6,992,596**	**6,151,116**	**5,021,840**	**4,033,253**	**8,546,109**	**715,038**	**1,934,244**	**1,981,192**	**11,199,395**	**28,052,766**	**74,627,549**
Credit risk of exposures relating to off-balance sheet items:											
Letters of guarantee, letters of credit and other guarantees	544,415	543,094	1,067,415	564,276	193,193	88,619	7,184	62,871	309,277	66,876	3,447,220
Undrawn loan commitments	24,245	711,582	260,012	790,593	2,642	35,897	5,813	84,588	283,256	1,823,327	4,021,955
Total amount of off-balance sheet items exposed to credit risk (b)	**568,660**	**1,254,676**	**1,327,427**	**1,354,869**	**195,835**	**124,516**	**12,997**	**147,459**	**592,533**	**1,890,203**	**7,469,175**
Total credit risk exposures (a+b)	**7,012,539**	**7,404,264**	**6,206,289**	**5,388,119**	**8,546,109**	**839,554**	**1,947,241**	**2,126,451**	**2,858,484**	**28,052,766**	**72,467,854**

307 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

EXPOSURE IN CREDIT RISK FROM DEBT ISSUED BY THE GREEK STATE

The table below presents the Bank's total exposure in Greek State debt:

	31.12.2020		31.12.2019	
Portfolio	**Nominal value**	**Carrying amount**	**Nominal value**	**Carrying amount**
Securities measured at fair value through other comprehensive income	2,421,736	2,771,014	3,321,392	3,980,339
Securities measured at amortized cost	2,118,842	2,779,179	921,600	1,070,730
Trading	21,762	29,154	14,657	17,490
Total	**4,562,340**	**5,579,347**	**4,257,649**	**5,068,559**

All Greek Government securities are classified in level 1 based on the quality of inputs used for the estimation of their fair value.

The Bank's exposure to Greek State from other, apart from securities, financial instruments is presented in the table below:

On balance sheet exposure

	31.12.2020	31.12.2019
	Carrying amount	
Derivative financial instruments-assets	860,878	658,048
Derivative financial instruments-liabilities	(11,965)	(32,045)

The Group's exposure in loans to public sector entities / organizations on 31.12.2020 amounted to € 45,052 (31.12.2019: € 58,740). The Group has recognized allowance for expected credit losses for the above mentioned loans that amounts to € 1,054 as at 31.12.2020 (31.12.2019: € 858). In addition, the balance of the Group's loans guaranteed by the Greek State (guaranteed either directly by Greek Government or by Common Ministerial Decisions, loans guaranteed by ETEAN and loans guaranteed from the Hellenic Development Bank) on 31.12.2020 amounted to € 1,479,206 (31.12.2019: € 513,632). For these loans the Group has recognized allowance for expected credit losses amounting to € 75,517 as at 31.12.2020 (31.12.2019: € 66,889). It is noted that the carrying amount of loans with guarantee by the Covid-19 Guarantee Fund of the Hellenic Development Bank amounted to € 997,261 as at 31.12.2020.

Off balance sheet exposure

	31.12.2020		31.12.2019	
Portfolio	**Nominal value**	**Carrying amount**	**Nominal value**	**Carrying amount**
Greek Government Treasury Bills received as collateral for derivatives transactions	900,000	900,000	870,000	869,913
Greek Government Bonds received as collateral for funding purposes	335,407	402,695		

43.2 Market risk

Market risk is the risk of losses arising from unfavorable changes in the value or volatility of interest rates, foreign exchange rates, stock exchange indices, equity prices and commodities. Losses may also occur either from the trading portfolio or from the Assets-Liabilities management.

More specifically:

- Interest rate risk is the risk that results from the Group's exposure to adverse changes in the value or volatility of interest rates.
- Foreign exchange risk is the risk arising from adverse changes in the value or volatility of foreign exchange rates.
- Equity risk is the risk arising from adverse changes in the value or volatility of equities or equity indices. The Group holds no material portfolio in such instruments.

308 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

i. Trading portfolio

The Group Market Risk Management Policy elaborates on how market risk is managed within the Group, i.e. the identification, measurement, monitoring and control of market risk inherent in Treasury assets and liabilities transacted by the Group and the country local Treasury Management Units, as well as the determination that adequate capital is held against this type of risk. The ultimate objective of the Policy is to provide the framework and principles for the effective management of market risk, in order to:

- maintain market risk within the limits, in line with the Group's risk appetite;
- reduce the risk of fraud or regulatory non-compliance by prescribing sound methodologies;
- ensure adequate controls to prevent significant losses;
- facilitate efficient decision-making by quantifying where possible the probabilities of failing to achieve earnings or other targets.

All competent Group units and country local Units apply the Policy by developing and applying corresponding processes.

Market risk of trading portfolio is measured by Value at Risk – VAR, that is the maximum amount of loss with a given probability (confidence level). The method applied for calculating Value at Risk is historical simulation with full revaluation using the 99th percentile and one tailed confidence interval. The historical observation period is one year at minimum. Risk factor returns are calculated according to the absolute or relative approach.

The Bank calculates VAR on a daily basis and the data sets are updated daily. A holding period of one and ten days is applied for regulatory purposes. Additional holding periods may be applied for internal purposes, according to the time required for the liquidation of the portfolio.

In line with the regulatory requirement, back-testing is performed on a daily basis for the Bank prudential trading book through the use of hypothetical and actual outcomes by monitoring the number of times that the trading outcomes exceed the corresponding risk measure.

1 day value at risk, 99% confidence interval (2 years historical data)

(Amounts in Euro)

	2020				
	Foreign currency risk	**Interest rate risk**	**Price risk**	**Covariance**	**Total**
31 December	2,669,548	4,212,418	13,943	(2,243,487)	**4,652,422**
Average daily value (annual)	2,334,525	4,294,868	21,693	(1,987,989)	**4,663,097**
Maximum* daily value (annual)	2,782,449	4,985,643		(2,130,660)	**5,637,432**
Minimum* daily value (annual)	1,786,471	3,317,572	38,585	(2,011,525)	**3,131,103**

	2019				
	Foreign currency risk	**Interest rate risk**	**Price risk**	**Covariance**	**Total**
31 December	1,762,634	3,153,803	34,238	(1,816,901)	**3,133,774**
Average daily value (annual)	1,543,660	2,249,484	24,079	(1,402,094)	**2,415,128**
Maximum* daily value (annual)	1,755,297	3,190,158	35,521	(1,754,281)	**3,226,695**
Minimum* daily value (annual)	1,022,390	1,962,745	7,477	(1,265,027)	**1,727,585**

The above items concern the Bank. The Group's subsidiaries and branches have limited trading positions, which are immaterial compared to the positions of the Bank. As a result, the market risk effect deriving from these positions on the total income, is immaterial.

The Value at Risk methodology is based on certain theoretical assumptions, which under extreme market conditions might not capture the maximum loss the Bank may suffer, The limitations of the methodology may be summarized as follows:

- Value at risk refers to the potential loss at a 99% confidence level, without considering any losses beyond that level
- Risk factor returns are assumed to follow the empirical distribution that was experienced during the historical observation period.

* Relates to the total Value at Risk within the year.

309 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

On a daily basis, a retrospective test of Value at Risk model is carried out, taking into account hypothetical and actual changes in the trading book's profit and loss. According to best practices, the model is validated by an independent unit at the Bank on an annual basis.

The Value at Risk methodology is complemented with scenario analysis and stress testing, in order to estimate the potential size of losses that could arise from the trading portfolio for hypothetical as well as historical extreme movements of market parameters (stress-testing).

Within the scope of market risk control, open position, maximum loss (stop loss) and value at risk limits have been set across trading positions.

In particular, limits have been set for the following risks:

- Foreign currency risk regarding spot and forward positions and FX options
- Interest rate risk regarding positions in bonds, Interest Rate Swaps, Interest Futures, Interest Options
- Price risk regarding positions in shares, index Futures and options, Commodity Futures and Swaps
- Credit risk regarding interbank transactions and bonds

Positions held in these products are monitored on a daily basis and are examined for the corresponding limit percentage cover and for any limit excess.

ii. The financial risks of the banking portfolio

The Market risk may derive, apart from the trading portfolio, from the structure of assets and liabilities and from the portfolio of loans and deposits of the Group. This risk is a foreign exchange and interest rate risk.

a. Foreign currency risk

The Group takes on the risk arising from the fluctuations in foreign exchange rates.

The management of foreign currency position is centralized.

The policy of the Group is the positions to be closed immediately using spot transactions or currency derivatives. In case that positions remain open, they are daily monitored in the context of the financial risk management policy and they are subject to limits.

The total open position arises from the net balance sheet position and derivatives forward position as presented in the following tables:

	31.12.2020								
	USD	**GBP**	**CHF**	**JPY**	**RON**	**RSD**	**Other FC**	**Euro**	**Total**
ASSETS									
Cash and balances with Central Banks	9,890	7,309	1,140	44	151,171		17,131	7,280,631	7,467,316
Due from banks	281,548	67,315	11,835	4,327	113,623	112	24,675	2,238,112	2,741,547
Trading securities								30,014	30,014
Derivative financial assets								1,267,083	1,267,083
Loans and advances to customers	2,028,344	484,610	964,809	14,049	1,226,384		84,529	34,577,277	39,380,002
Investment securities:									
- Measured at amortized cost								3,335,733	3,335,733
- Measured at fair value through other comprehensive income	77,540	16,719			178,483		95,850	6,209,106	6,577,698
- Measured at fair value through profit or loss	32,581							105,094	137,675
Investments in associates and joint ventures								30,716	30,716
Investment property					111,389		24,152	434,335	569,876
Property, plant and equipment		6,388			77,505		22,133	690,305	796,331
Goodwill and other intangible assets					6,759		730	594,329	601,818
Deferred tax assets					663		312	5,291,637	5,292,612
Other assets	1,758	1,343		17	21,566		22,636	1,540,623	1,587,943
Assets held for sale					1,538			238,805	240,343
Total Assets	**2,431,662**	**583,684**	**977,784**	**18,437**	**1,889,081**	**112**	**292,148**	**63,863,800**	**70,056,707**
LIABILITIES									
Due to banks and customers	2,273,359	268,616	415,760	3,828	1,152,667	21	407,521	52,415,849	56,937,621
Derivative financial liabilities								1,768,357	1,768,357
Debt securities in issue and other borrowed funds					66,390			1,156,479	1,222,869
Liabilities for current income tax and other taxes					7			70,134	70,141
Deferred tax liabilities		66			9,493		1,389	23,731	34,679
Employee defined benefit obligations								94,386	94,386
Other liabilities and Liabilities related to assets classified as held for sale	7,813	11,665	374	579	76,399		16,591	778,410	891,831
Provisions	1,607	25	4		5,961		2,380	693,653	703,630
Total liabilities	**2,282,779**	**280,372**	**416,138**	**4,407**	**1,310,917**	**21**	**427,881**	**57,000,999**	**61,723,514**
Net balance sheet position	148,883	303,312	561,646	14,030	578,164	91	(135,733)	6,862,801	8,333,193
Derivatives forward foreign exchange position	(106,505)	(279,501)	(256,319)	(13,969)	(474,966)		182,475	933,636	(15,149)
Total Foreign exchange position	**42,377**	**23,811**	**305,327**	**61**	**103,198**	**91**	**46,742**	**7,796,437**	**8,318,044**

The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*								
	USD	**GBP**	**CHF**	**JPY**	**RON**	**RSD**	**Other FC**	**Euro**	**Total**
ASSETS									
Cash and balances with Central Banks	8,491	12,393	1,191	125	166,412		19,106	1,820,617	2,028,335
Due from banks	277,527	42,474	60,925	11,081	45,090	117	28,050	2,867,426	3,332,690
Trading securities	370							18,381	18,751
Derivative financial assets								1,009,193	1,009,193
Loans and advances to customers	2,056,425	485,036	728,738	11,278	1,128,578		75,388	34,780,826	39,266,269
Investment securities:									
- Measured at amortized cost								1,070,730	1,070,730
- Measured at fair value through other comprehensive income	93,913	17,698			191,686		89,926	7,126,707	7.519.930
- Measured at fair value through profit or loss	38,627							54,483	93,110
Investments in associates and joint ventures								13,385	13,385
Investment property					45,253		26,147	414,436	485,836
Property, plant and equipment		7,753			53,044		34,292	757,243	852,332
Goodwill and other intangible assets		17			4,731		592	487,006	492,346
Deferred tax assets					256		235	5,173,806	5,174,297
Other assets	761	1,188	39,277	1,575	25,716		22,077	1,446,304	1,536,898
Assets held for sale					1,565			561,954	563,519
Total Assets	**2,476,114**	**566,559**	**830,131**	**24,059**	**1,662,331**	**117**	**295,813**	**57,602,497**	**63,457,621**
LIABILITIES									
Due to banks and customers	2,337,518	262,843	80,247	1,821	1,102,460		388,975	46,451,703	50,625,567
Derivative financial liabilities								1,446,915	1,446,915
Debt securities in issue and other borrowed funds	156,084				30,091			902,518	1,088,693
Liabilities for current income tax and other taxes		499			6,936		1,396	31,042	39,873
Deferred tax liabilities		95			3,074		1,424	27,272	31,865
Employee defined benefit obligations								90,932	90,932
Other liabilities and Liabilities related to assets classified as held for sale	13,404	7,655	39,864	2,255	8,537		25,791	961,139	1,058,645
Provisions	1,098	11	3		4,971		3,105	590,353	599,541
Total liabilities	**2,508,104**	**271,103**	**120,114**	**4,076**	**1,156,069**	**-**	**420,691**	**50,501,874**	**54,982,031**
Net balance sheet position	(31,990)	295,456	710,017	19,983	506,262	117	(124,878)	7,100,623	8,475,590
Derivatives forward foreign exchange position	48,124	(294,475)	(507,852)	(19,876)	(490,025)		179,190	1,076,558	(8,356)
Total Foreign exchange position	**16,134**	**981**	**202,165**	**107**	**16,237**	**117**	**54,312**	**8,177,181**	**8,467,234**

* Certain figures of the previous year have been restated as described in note 50.

312 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The open foreign exchange position as at 31.12.2020 presents the following sensitivity analysis:

Currency	Exchange rate variation scenario against Euro (%)	Impact on net income before tax	Impact on Equity
USD	5% Depreciation EUR against USD	2,230	
	5% Appreciation EUR against USD	(2,018)	
GBP	5% Depreciation EUR against GBP	1,253	
	5% Appreciation EUR against GBP	(1,134)	
CHF	5% Depreciation EUR against CHF	16,070	
	5% Appreciation EUR against CHF	(14,539)	
RON	5% Depreciation EUR against RON		5,431
	5% Appreciation EUR against RON		(4,914)
RSD	5% Depreciation EUR against RSD	5	
	5% Appreciation EUR against RSD	(4)	
ALL	5% Depreciation EUR against ALL		(504)
	5% Appreciation EUR against ALL		456

b. Interest Rate Risk

Banking book interest rate risk relates to the volatility on Equity and interest income of the Group due to the mismatch between the non-negotiable Assets-Liabilities and the measured at fair value through other comprehensive income portfolio. The interest rate risk management framework is determined in accordance with the Asset Liability Risk Management Policy. Based on this framework, the risk analysis of the Banking Portfolio is analyzed through the Interest Rate Gap Analysis. Particularly, assets and liabilities are classified in Gaps depending on their reprising date for floating-rate items, or maturity date for fixed rate items.

For those assets and liabilities with no maturity date, the distribution of flows is based on models of their behavior analysis. These models have been validated by the competent independent Division of the Bank. Interest rate risk management is carried out by ALCO, following proposals by Group Market and Operational Risk Division, Financial Markets Division and Asset Liability Management Division. Stress interest rate scenarios are carried out on a monthly basis and their impact on the interest income change through EAR (Earnings at Risk) and Equity Value through EVE (Economic Value of Equity) is calculated. Corresponding limits have been set for both measures (EaR & EVE) which are monitored and presented to ALCO and RMC on a regular basis.

313 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following table presents the Interest Rate Repricing Analysis of both Assets and Liabilities, financial and non financial.

	31.12.2020							
	Less than 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	> 5 years	Non-interest bearing	Total
ASSETS								
Cash and balances with Central Banks	7,185,547						281,769	7,467,316
Due from Banks	2,312,230	2,272	220,787	107	282	205,869		2,741,547
Trading securities					2,044	27,970		30,014
Derivative financial assets	1,267,083							1,267,083
Loans and advances to customers	13,890,463	7,935,173	3,007,158	1,400,584	8,797,863	4,348,761		39,380,002
Investment securities								
- Measured at amortized cost			99,791	73,108	497,148	2,665,686		3,335,733
- Measured at fair value through other comprehensive income	180,562	623,106	782,325	407,998	2,452,720	2,130,987		6,577,698
- Measured at fair value through profit or loss		121,198				16,477		137,675
Investments in associates and joint ventures							30,716	30,716
Investment property							569,876	569,876
Property, plant and equipment							796,331	796,331
Goodwill and other intangible assets							601,818	601,818
Deferred tax assets							5,292,612	5,292,612
Other assets							1,587,943	1,587,943
Assets held for sale							240,343	240,343
Total Assets	**24,835,885**	**8,681,749**	**4,110,061**	**1,881,797**	**11,750,057**	**9,395,750**	**9,401,408**	**70,056,707**
LIABILITIES								
Due to banks	622,068	354,647	376,913	107,645	11,645,408			13,106,681
Derivative financial liabilities	1,768,357							1,768,357
Due to customers	10,442,027	6,251,906	3,877,172	4,403,220	12,432,274	6,424,341		43,830,940
Debt securities in issue held by institutional investors and other borrowed funds	651		1,552		1,220,666			1,222,869
Liabilities for current income tax and other taxes							70,141	70,141
Deferred tax liabilities							34,679	34,679
Employee defined benefit obligations							94,386	94,386
Other liabilities							891,580	891,580
Provisions							703,630	703,630
Liabilities related to assets held for sale							251	251
Total Liabilities	**12,833,103**	**6,606,553**	**4,255,637**	**4,510,865**	**25,298,348**	**6,424,341**	**1,794,667**	**61,723,514**
EQUITY								-
Share capital							463,110	463,110
Share premium							10,801,029	10,801,029
Reserves							492,791	492,791
Amounts recognized directly in Equity related to assets held for sale							-	-
Retained earnings							(3,467,818)	(3,467,818)
Non-controlling interests							29,382	29,382
Hybrid securities							14,699	14,699
Total Equity	**-**	**-**	**-**	**-**	**-**	**-**	**8,333,193**	**8,333,193**
Total Liabilities and Equity	**12,833,103**	**6,606,553**	**4,255,637**	**4,510,865**	**25,298,348**	**6,424,341**	**10,127,860**	**70,056,707**
OPEN EXPOSURE	**12,002,782**	**2,075,196**	**(145,576)**	**(2,629,068)**	**(13,548,291)**	**2,971,409**	**(726,452)**	**-**
CUMULATIVE EXPOSURE	**12,002,782**	**14,077,978**	**13,932,402**	**11,303,334**	**(2,244,957)**	**726,452**		

314 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*							
	Less than 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	> 5 years	Non-interest bearing	Total
ASSETS								
Cash and balances with Central Banks	1,674,997						353,338	2,028,335
Due from Banks	1,808,429	1,213,430	39,139	46,446	25,908	199,338		3,332,690
Trading securities			389		7,371	10,991		18,751
Derivative financial assets	1,009,193							1,009,193
Loans and advances to customers	14,337,017	7,294,016	2,619,941	1,541,585	8,910,122	4,563,588		39,266,269
Investment securities								
- Measured at amortized cost					88,104	982,626		1,070,730
- Measured at fair value through other comprehensive income	115,726	248,455	317,555	406,050	3,568,845	2,863,299,		7,519,930
- Measured at fair value through profit or loss		2,009	22,751	1,793	819	65,738		93,110
Investments in associates and joint ventures							13,385	13,385
Investment property							485,836	485,836
Property, plant and equipment							852,332	852,332
Goodwill and other intangible assets							492,346	492,346
Deferred tax assets							5,174,297	5,174,297
Other assets							1,536,898	1,536,898
Assets held for sale		409,118		22,570			131,831	563,519
Total Assets	**18,945,362**	**9,167,028**	**2,999,775**	**2,018,444**	**12,601,169**	**8,685,580**	**9,040,263**	**63,457,621**
LIABILITIES								
Due to banks	4,486,698	781,303	986,662	2,450,100	1,556,520			10,261,283
Derivative financial liabilities	1,446,915							1,446,915
Due to customers	11,260,544	4,591,242	4,349,472	4,358,994	10,358,662	5,445,370		40,364,284
Debt securities in issue held by institutional investors and other borrowed funds	154,304	738,781	195,608					1,088,693
Liabilities for current income tax and other taxes							39,873	39,873
Deferred tax liabilities							31,865	31,865
Employee defined benefit obligations							90,932	90,932
Other liabilities							1,057,844	1,057,844
Provisions							599,541	599,541
Liabilities related to assets held for sale							801	801
Total Liabilities	**17,348,461**	**6,111,326**	**5,531,742**	**6,809,094**	**11,915,182**	**5,445,370**	**1,820,856**	**54,982,031**
EQUITY								
Share capital							463,110	463,110
Share premium							10,801,029	10,801,029
Reserves							739,676	739,676
Amounts recognized directly in Equity related to assets held for sale							(122)	(122)
Retained earnings							(3,572,126)	(3,572,126)
Non-controlling interests							28,951	28,951
Hybrid securities							15,072	15,072
Total Equity	**-**	**-**	**-**	**-**	**-**	**-**	**8,475,590**	**8,475,590**
Total Liabilities and Equity	**17,348,461**	**6,111,326**	**5,531,742**	**6,809,094**	**11,915,182**	**5,445,370**	**10,296,446**	**63,457,621**
OPEN EXPOSURE	**1,596,901**	**3,055,702**	**(2,531,967)**	**(4,790,650)**	**685,987**	**3,240,210**	**(1,256,183)**	**-**
CUMULATIVE EXPOSURE	**1,596,901**	**4,652,603**	**2,120,636**	**(2,670,014)**	**(1,984,027)**	**1,256,183**	**-**	**-**

* Certain figures of the previous year have been restated as described in note 50.

315 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

From the Interest Rate Gap Analysis and from the application of alternative scenarios regarding the changes in the market interest rates or the changes in the base interest rates of the Bank and the companies of the Group, the immediate change in the net interest income and equity relating to securities measured at fair value through other comprehensive income is directly calculated and the respective hedging instruments. In the Interest Rate Gap Analysis, the variance, up to the point it's feasible (interest rate equals to zero), is studied, according to the interest rate curves by currency in force.

Interest rate variation scenario (parallel fall or rise in yield curves)	Sensitivity for net interest income (annual)	Sensitivity of Equity
-200	(72,734)	+499,051
+200	+30,960	(425,265)

43.3 Liquidity Risk

Liquidity risk relates to Group's ability to maintain sufficient funds to cover its planned or extraordinary obligations. Liquidity Risk comprises both funding liquidity risk and asset liquidity risk though these two dimensions of liquidity risk are closely related. Funding Liquidity risk refers to the inability of a financial institution to raise the cash necessary to rollover its debt, fulfill the cash, margin, or collateral requirements of counterparties; or to meet capital withdrawals. Asset – market liquidity risk, results from the Bank's failure to recognize or address changes in market conditions that affect the ability to liquidate assets quickly and with minimal loss in value.

For those assets and liabilities with no maturity date, the distribution of flows is based on models of their behavior analysis. These models have been validated by the competent independent Division of the Bank. According to Group's Liquidity Risk Management Policy, the Board Risk Management Committee assigns the overall responsibility for overseeing asset and liability management to Asset – Liability Committee (ALCo). ALCo is responsible on one hand to monitor the quantitative and qualitative aspects of liquidity risk and on the other hand to ensure that appropriate policies and procedures are in place to control and limit liquidity risk. In addition to that, ALCo is responsible for approving the guidelines, principles, risk measurement techniques and limits that have been proposed by the Group Market and Operational Risk Division, Financial Markets Division and Asset Liability Management Division.

Group's executive and senior management is informed on current liquidity risk exposures on a daily basis, ensuring that the Group's liquidity risk profile stays within approved limits. Moreover, management receives on a daily basis a liquidity report, which presents a detailed analysis of Bank's funding sources and counterbalancing capacity. Among others, for the purpose of proper management of liquidity risk and in line with supervisory requirements, the Bank monitors and manages on a monthly basis, the amount, quality and concentration of counterbalancing capacity, the cash flows arising from assets and liabilities (inflows, outflows – maturity ladder) over time, the concentration and cost of funding, the roll over of funding.

The Group calculates the Liquidity Coverage Ratio* and Net Stable Funding Ratio on a monthly and quarterly basis respectively as defined by Regulation (EU) 575/2013. Both ratios (LCR and NSFR) exceeded the minimum acceptable supervisory threshold (100%) with Liquidity Coverage Ratio reaching 151%. This is attributed to the increase in customer deposits, improved access to interbank markets, the issuance of Tier 2 bonds in February 2020 as well as the increase in long-term lending through the Eurosystem (TLTRO-III).

The following list summarizes the main reports which are produced on a periodic basis in order to inform the Group's executive and senior management and the ALCo; Static Liquidity Gap analysis, regulatory liquidity ratios of the Group and the subsidiaries, deposit concentration report per subsidiary per currency, Group's Loans to Deposit ratio, liquidity risk indicators and triggers as defined in Recovery Plan of each subsidiary and the Group, liquidity stress testing according to scenarios that evaluate the impact of systemic and idiosyncratic stress events on each subsidiary's liquidity position.

Stress tests are carried out on a monthly basis and/ or more frequently, for liquidity purposes, in order to assess potential outflows (contractual or contingent) to determine the level of immediate liquidity available to cover the Bank's needs. These tests are carried out according to the approved, Liquidity Buffer and Liquidity Stress Scenario Policy of the Group and evaluate the risk in idiosyncratic extraordinary events (idiosyncratic stress test) in the Bank's liquidity, in systemic (systemic stress test) as well as combined events (combined stress test), while it has to be noted that stress tests are also used in order to determine the Liquidity buffer for recovery purposes. According to the policy and within the context of ILAAP, the Bank also applies a reverse stress test in order to examine its impact on its liquidity.

* Liquidity Coverage Ratio will be published under Pillar III

316 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Taking into account that liquidity risk management seeks to ensure that the respective risk of the Group is measured properly and is maintained within acceptable levels, even under adverse conditions, then the Group must have access to funds in order to cover customer needs, maturing liabilities and other capital needs, while maintaining at the same time the appropriate counterbalancing capacity to ensure the above.

More analytically, the total funding can be divided into two main categories:

A. Customer Deposits

1. Customer deposits on demand for cash flow needs

Deposits that are intended to meet short term needs of customers are the savings accounts and the sight deposits. Although these deposits may be withdrawn on demand, the number of accounts and type of depositors ensure that unexpected significant fluctuations are limited. Therefore, these deposits constitute a significant factor of stability of the deposit base.

2. Customer term deposits and bonds for investment purposes

The customer term deposits and bonds for investment purposes issued by the Group companies usually consist of customer deposits for a certain period and customer repurchase agreements (repos), whereas the bonds issued by the Group companies are disposed through outright sale. Customers have the ability of early withdrawal of deposits or early liquidation of bonds which may result in potential need of finding alternative liquidity in case of extensive outflows.

For this purpose and for the general safety of customer deposits, the Bank takes care for the existence of adequate liquidity surpluses which are calculated based on stress testing exercises due to loss of liquidity or the existence of sufficient credit lines of financial instruments as shown below.

B. Wholesale funding

1. Medium-term borrowing from international capital markets

The Bank's constant aspiration is to cooperate with international investors who may offer medium term financing through purchase of securities issued by the Group companies. For this purpose, the Bank retains special financing programs appealing to international investors and provides adequate coverage of credit needs through international capital markets by planning asset level needs on an annual basis. However, the Bank acknowledges that the demand of these bonds may not be enough to fully meet the needs in specific time intervals as a result of factors which concern the credit assessment in the domestic and international economic environment.

2. Funding by Central Banks

An alternative way of Bank funding is the liquidity from financial instruments of the Central Banks- Euro system and especially from the European Central Bank (ECB). This funding regards loan granted with pledge of assets according to instructions and the eligible assets determined by the ECB. During the last years this additional source funding has become a major financial instrument by hedging the inadequate or loss of basic forms of Bank funding. Furthermore, under the period on which Greece is under the restructuring program of economy and fiscal improvement of financial figures and simultaneously servicing financing needs of the network of institutions that have the supervision of the program, the Bank can use available assets in order to increase liquidity from the Euro system to cover any financing gap. The Bank recognizes the short-term nature of this liquidity source and pursues gradually to release, if circumstances allow. However, for as long as the country is experiencing financial and economic crisis, the Bank ensures the smooth financing from these financial instruments which may be either conventional marginal lending from the ECB (MRO), or Emergent Liquidity Assistance from Bank of Greece (ELA). The Bank ensures the adequacy of collateral required in order to serve the financing from the above financial instruments, while recognizing both the type and the amount of financing that is under the discretion of the Euro system.

European System funding increased by € 8.8 billion since 31.12.2019, amounting to € 11.9 billion on 31.12.2020, coming exclusively from the Targeted longer-term refinancing operations (TLTRO-III).

Through the financing of this program, the Bank managed to extend the time horizon of its financing into long-term loans as well as to improve the pricing conditions in relation to the repurchase agreements, which in 2020 decreased by 5,84 billions.

The financing from the Emergency Liquidity Assistance (ELA) of the Bank of Greece has been completely eliminated since February 2019.

According to the Liquidity Gap Analysis, the cash flows arising from balance sheet items are calculated and classified into time periods in accordance with the contractual maturity date or an estimated date based on a statistical analysis (convention). An exception to the above, are the securities portfolios, which can contribute directly to raise liquidity, and they are allocated in the first period under the condition they have not been used to raise liquidity either by the Central Bank or through interbank repos.

	31.12.2020					
	< 1 month	**1 to 3 months**	**3 to 6 months**	**6 to 12 months**	**> 1 year**	**Total**
Assets						
Cash and balances with central banks	7,467,316					7,467,316
Due from banks	2,257,983	8,656	230,432	19,398	225,078	2,741,547
Trading securities	30,014					30,014
Derivative financial assets	1,267,083					1,267,083
Loans and advances to customers	949,067	1,073,796	1,456,163	3,267,236	32,633,740	39,380,002
Investment securities						
- Measured at amortized cost			99,791	73,108	3,162,834	3,335,733
- Measured at fair value through other comprehensive income	6,577,698					6,577,698
- Measured at fair value through profit or loss	137,675					137,675
Investment in associates and joint ventures					30,716	30,716
Investment properties					569,876	569,876
Property, plant and equipment					796,331	796,331
Goodwill and other intangible assets					601,818	601,818
Deferred tax assets		468,044		3,334,872	1,489,696	5,292,612
Other Assets					1,587,943	1,587,943
Assets held for sale		26,076	161,601	51,222	1,444	240,343
Total Assets	**18,686,836**	**1,576,572**	**1,947,987**	**6,745,836**	**41,099,476**	**70,056,707**
Liabilities						
Due to banks	426,235	29,518	371,674	108,959	12,170,295	13,106,681
Derivative financial liabilities	1,768,357					1,768,357
Due to customers	7,933,662	6,353,900	4,066,626	4,773,813	20,702,939	43,830,940
Debt securities in issue held by institutional investors and other borrowed funds					1,222,869	1,222,869
Liabilities for current income tax and other taxes		9,535	54,706	5,900		70,141
Deferred tax liabilities					34,679	34,679
Employee defined benefit obligations					94,386	94,386
Other Liabilities	2,798	7,033	9,565	18,658	853,526	891,580
Provisions					703,630	703,630
Liabilities related to assets held for sale					251	251
Total Liabilities	**10,131,052**	**6,399,986**	**4,502,571**	**4,907,330**	**35,782,575**	**61,723,514**
Equity						
Share capital					463,110	463,110
Share premium					10,801,029	10,801,029
Reserves					492,791	492,791
Amounts recognized directly in Equity related to assets held for sale						-
Retained earnings					(3,467,818)	(3,467,818)
Non-controlling interests					29,382	29,382
Hybrid securities					14,699	14,699
Total Equity					**8,333,193**	**8,333,193**
Total Liabilities and Equity	**10,131,052**	**6,399,986**	**4,502,571**	**4,907,330**	**44,115,768**	**70,056,707**
OPEN LIQUIDITY GAP	**8,555,784**	**(4,823,414)**	**(2,554,584)**	**1,838,506**	**(3,016,292)**	
CUMULATIVE LIQUIDITY GAP	**8,555,784**	**3,732,370**	**1,177,786**	**3,016,292**		

318 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*					
	< 1 month	1 to 3 months	3 to 6 months	6 to 12 months	> 1 year	Total
Assets						
Cash and balances with central banks	2,028,335					2,028,335
Due from banks	1,624,572	1,085,697	9,599	42,596	570,226	3,332,690
Trading securities	18,751					18,751
Derivative financial assets	1,009,193					1,009,193
Loans and advances to customers	1,216,537	1,646,460	1,347,551	2,909,020	32,146,701	39,266,269
Investment securities						
- Measured at amortized cost					1,070,730	1,070,730
- Measured at fair value through other comprehensive income	7,519,930					7,519,930
- Measured at fair value through profit or loss	93,110					93,110
Investment in associates and joint ventures					13,385	13,385
Investment properties					485,836	485,836
Property, plant and equipment					852,332	852,332
Goodwill and other intangible assets					492,346	492,346
Deferred tax assets		434,267		1,716,882	3,023,148	5,174,297
Other Assets					1,536,898	1,536,898
Assets held for sale	4,642	483,266	27,157	46,454	2,000	563,519
Total Assets	**13,515,070**	**3,649,690**	**1,384,307**	**4,714,952**	**40,193,602**	**63,457,621**
Liabilities						
Due to banks	4,284,187	489,188	968,980	2,463,711	2,055,217	10,261,283
Derivative financial liabilities	1,446,915					1,446,915
Due to customers	9,459,515	4,892,955	4,570,968	4,717,188	16,723,658	40,364,284
Debt securities in issue held by institutional investors and other borrowed funds		217,040			871,653	1,088,693
Liabilities for current income tax and other taxes		18,573	14,800	6,500		39,873
Deferred tax liabilities				31,865		31,865
Employee defined benefit obligations					90,932	90,932
Other Liabilities	3,185	5,977	9,460	10,983	1,028,239	1,057,844
Provisions					599,541	599,541
Liabilities related to assets held for sale					801	801
Total Liabilities	**15,193,802**	**5,623,733**	**5,564,208**	**7,230,247**	**21,370,041**	**54,982,031**
Equity						
Share capital					463,110	463,110
Share premium					10,801,029	10,801,029
Reserves					739,554	739,554
Retained earnings					(3,572,126)	(3,572,126)
Non-controlling interests					28,951	28,951
Hybrid securities					15,072	15,072
Total Equity					**8,475,590**	**8,475,590**
Total Liabilities and Equity	**15,193,802**	**5,623,733**	**5,564,208**	**7,230,247**	**29,845,631**	**63,457,621**
OPEN LIQUIDITY GAP	**(1,678,732)**	**(1,974,043)**	**(4,179,901)**	**(2,515,295)**	**10,347,971**	
CUMULATIVE LIQUIDITY GAP	**(1,678,732)**	**(3,652,775)**	**(7,832,676)**	**(10,347,971)**		

* Certain figures of the previous year have been restated as described in note 50.

319 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Trading and Investment portfolios measured at fair value through profit or loss and through other comprehensive income are listed based on their liquidity potential and not according to their maturity.

Cash flows arising from financial liabilities including derivative financial liabilities, are allocated into time bands according to their maturity date. Estimated interest payments are also included. Liabilities in foreign currency have been converted into Euro. Outflows and inflows relating to derivatives are estimated according to their contractual terms.

	31.12.2020						
	Total Balance Sheet	Nominal inflows / (outflows)					Total
		to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	More than 1 year	
Liabilities- non-derivative							
Due to banks	13,106,681	(421,230)	(19,701)	(357,216)	(80,350)	(12,118,447)	(12,996,944)
Due to customers	43,830,940	(7,936,288)	(6,358,507)	(4,073,109)	(4,785,929)	(20,751,610)	(43,905,443)
Debt securities in issue and other borrowed funds	1,222,869	(2,834)	(5,559)	(8,413)	(16,870)	(1,290,153)	(1,323,829)
Other liabilities	891,580	(3,039)	(7,893)	(10,337)	(20,094)	(872,207)	(913,570)
Derivative held for assets fair value hedge	13,791						
- Outflows		(47,185)	(323)	(3,112)	(3,557)	(85,446)	(139,623)
- Inflows		44,731			1,820	89,257	135,808
Derivatives held for liabilities fair value hedge							
- Outflows							-
- Inflows							-
Derivatives held for trading	1,754,566						
- Outflows		(208,000)	(399,110)	(249,908)	(130,980)	(1,723,655)	(2,711,653)
- Inflows		197,904	340,412	190,436	121,819	1,246,302	2,096,873
Total	**60,820,427**	**(8,375,941)**	**(6,450,681)**	**(4,511,659)**	**(4,914,141)**	**(35,505,959)**	**(59,758,381)**
Off Balance sheet items							
Undrawn loan commitments which can't be recalled (committed)		(130,088)					(130,088)
Financial guarantees		53,612	54,696	99,594	224,632	1,905,348	2,337,882
Total off Balance sheet items		**(76,476)**	**54,696**	**99,594**	**224,632**	**1,905,348**	**2,207,794**

320 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*						
	Total Balance Sheet	Nominal inflows / (outflows)					Total
		to 1 month	1 to 3 months	3 to 6 months	6 to 12 months	More than 1 year	
Liabilities- non-derivative							
Due to banks	10,261,283	(4,284,644)	(490,064)	(970,070)	(2,470,070)	(2,078,601)	(10,293,449)
Due to customers	40,364,284	(9,481,463)	(4,907,771)	(4,590,240)	(4,752,145)	(16,841,651)	(40,573,270)
Debt securities in issue and other borrowed funds	1,088,693	(1,079)	(220,078)	(5,404)	(9,071)	(906,975)	(1,142,607)
Other liabilities	1,057,844	4,410	6,796	10,408	20,008	1,040,430	1,082,052
Derivative held for assets fair value hedge	326,719						
- Outflows		(76,022)	(321)	(20,091)	(4)	(366,393)	(462,831)
- Inflows		72,266		5,106	10,282	351,232	438,886
Derivatives held for liabilities fair value hedge							
- Outflows							-
- Inflows							-
Derivatives held for trading	1,120,199						
- Outflows		(155,219)	(293,845)	(237,884)	(95,014)	(1,128,700)	(1,910,662)
- Inflows		141,298	247,375	198,572	88,360	1,035,422	1,711,027
Total	**54,219,022**	**(13,780,453)**	**(5,657,908)**	**(5,609,603)**	**(7,207,654)**	**(18,895,236)**	**(51,150,854)**
Off Balance sheet items							
Undrawn loan commitments which can't be recalled (committed)		(101,389)					(101,389)
Financial guarantees		(25,646)	(9,902)	(21,500)	49,065	2,454,106	2,446,123
Total off Balance sheet items		**(127,035)**	**(9,902)**	**(21,500)**	**49,065**	**2,454,106**	**2,344,734**

* Certain figures of the previous year have been restated for comparability reasons.

321 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

43.4 Fair value of financial assets and liabilities

Hierarchy of financial intruments that are not measured at fair value

	31.12.2020				
	Level 1	Level 2	Level 3	Total fair value	Total Carrying amount
Financial Assets					
Loans and advances to customers			38,730,111	38,730,111	39,059,560
Investment securities					
- Measured at amortized cost	1,648,852	1,777,341		3,426,193	3,335,733
Financial liabilities					
Due to customers			43,824,360	43,824,360	43,830,940
Debt securities in issue and other borrowed funds	531,105	680,485		1,211,590	1,222,869

	31.12.2019				
	Level 1	Level 2	Level 3	Total fair value	Total Carrying amount
Financial Assets					
Loans and advances to customers			38,590,135	38,590,135	38,959,133
Investment securities					
- Measured at amortized cost	1,084,602			1,084,602	1,070,730
Financial liabilities					
Due to customers			40,345,792	40,345,792	40,364,284
Debt securities in issue and other borrowed funds	541,546	413,127	154,525	1,109,198	1,088,693

The above tables set out the fair values and carrying amounts of those financial assets that are not measured at fair value classified by fair value hierarchy.

The fair value of loans measured at amortised cost is estimated using the discounting cash flow models for the discounting of the contractual cash flows to maturity. The components of the discount rate are the interbank market yield curve, the liquidity premium and the expected loss rate. For the loans that for credit risk purposes are classified as impaired and are individually assessed for impairment, the model uses the expected future cash flows excluding expected credit losses. For the fair valuation of the impaired loans which are collectively assessed for impairment, estimates are made for principal repayment after taking into account the allowance for expected credit losses.

The interbank market yield curve and the liquidity premium serve as the discount rate for the impaired loans.

The fair value of deposits is estimated based on the interbank market yield curve and the liquidity premium until their maturity.

Level 1 includes securities and debt securities in issue that are traded in active markets.

Level 2 includes securities and debt securities in issue, the fair value of which, is determined based on non-binding market prices provided by dealers-brokers or through the use of discounted cash flow methodologies such (income approach) using interest rates and credit spreads which are observable in the market.

Level 3 includes the Group's liabilities to the Special Purpose Entities, related to securitized loans. The fair value of these liabilities was calculated by discounting future cash flows taking into account non-observable market data.

The fair value of the remaining financial assets and liabilities which are measured at amortised cost and include mainly due from banks and central banks as well as due to banks, does not differ materially from their respective carrying amount.

322 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Fair Value hierarchy – financial assets and liabilities measured at fair value

	31.12.2020			
	Level 1	Level 2	Level 3	Total fair value
Derivative financial assets	2,420	1,264,663		1,267,083
Trading securities				
- Bonds and Treasury bills	29,154			29,154
- Shares	860			860
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury bills	6,335,594	194,199	1,018	6,530,811
- Shares	14,592		32,295	46,887
Securities measured at fair value through profit or loss				
- Bonds and Treasury bills	835		12,408	13,243
- Other variable yield securities	65,317	20,215		85,532
- Shares	6,064	22,690	10,146	38,900
Loans measured at fair value through profit or loss			280,882	280,882
Other Receivables measured at fair value through profit or loss			40,000	40,000
Derivative financial liabilities	40	1,768,917		1,768,357

	31.12.2019*			
	Level 1	Level 2	Level 3	Total fair value
Derivative financial assets	2,288	1,005,925	980	1,009,193
Trading securities				
- Bonds and Treasury bills	17,490	371		17,861
- Shares	890			890
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury bills	7,324,764	131,868	10,532	7,467,164
- Shares	10,853	0	41,913	52,766
Securities measured at fair value through profit or loss				
- Bonds and Treasury bills	9,025	1,059	12,497	22,581
- Other variable yield securities	30,334	37,569		67,903
- Shares	2,133		493	2,626
Loans measured at fair value through profit or loss			307,136	307,136
Derivative financial liabilities		1,446,915		1,446,915

The above tables present the fair value hierarchy of financial instruments measured at fair value by the level of the fair value hierarchy into which the fair value measurement is categorized.

Level 1 includes securities which are traded in an active market and exchange-traded derivatives.

Level 2 includes securities whose fair value is calculated based on non-binding market prices provided by dealers-brokers or securities whose fair value is estimated based the income approach methodology with the use of interest rates and credit spreads which are observable in the market.

Level 3 includes securities whose fair value is estimated using significant unobservable inputs.

Relating to impact of Covid-19, it is noted that the Group, following the relevant measures taken by the Central Banks and the member states as well as the consequent normalization of the financial markets and capital markets, did not consider that it was appropriate to change in the methodology for calculating fair values of securities and derivatives as at 31.12.2020.

The valuation methodology of securities is subject to approval by the Treasury and Balance Sheet Management / Assets

* Certain figures of the previous year have been restated as described in note 50.

323 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Liabilities Management Committees. It is noted that specifically for securities whose fair value is calculated based on market prices, bid prices are considered and daily checks are performed with regards to their change in fair value.

The fair value of loans measured at fair value through profit or loss, is estimated based on the valuation methodology as described above regarding the disclosure of fair value estimation for loans measured at amortized cost.

Shares whose fair value is estimated are classified to Level 2 or Level 3, depending on the extent of the contribution of unobservable data to the calculation of the final fair value. The fair value of non-listed shares, as well as shares not traded in an active market is determined either based on the Group's share on the issuer's equity or by the multiples valuation method or the estimations made by the Group regarding the future profitability of the issuer taking into account the expected growth rate of its operations, as well as the weighted average rate of capital return which is used as discount rate.

For the valuation of over the counter derivatives income approach methodologies are used: discounted cash flow models, option-pricing models or other widely accepted financial valuation models.

The valuation methodology of the over the counter derivatives is subject to approval by the Treasury and Balance Sheet Management / Assets Liabilities Management Committees. Mid prices are considered as both long and short positions may be open. Valuations are checked on a daily basis with the respective prices of the counterparty banks in the context of the daily process of provision of collaterals and settlement of derivatives. If the non observable inputs are significant, the fair value that arises is classified as Level 3 or otherwise as Level 2. We note that on 27.7.2020 the reference rate in the discount rate of interest rate derivatives in euro (interest rate swaps) that are cleared centrally, changed from Euro overnight index average (EONIA) to Euro short term rate (€ STR). Due to the change in valuation methodology the fair value of the derivatives was changed and at the same time a compensation amounting to € 745 was collected and recognized in gains less losses on financial transactions, so that there is no transfer of value between the two parties. The change in the discount curve has no effect on the Group's results.

In addition, the Group calculates the credit valuation adjustment (CVA) in order to take into account the counterparty credit risk for the OTC derivatives. In particular, taking into consideration its own credit risk, the Group calculates the bilateral credit valuation adjustment (Bilateral CVA/BCVA) for the OTC derivatives held on a counterparty level according to netting and collateral agreements in force. BCVA is calculated across all counterparties with a material effect on the respective derivative fair values taking into consideration the default probability of both the counterparty and Group, the impact of the first to default, the expected OTC derivative exposure, the loss given default of the counterparty and of Group and the specific characteristics of netting and collateral agreements in force.

Collaterals are simulated along with the derivative portfolio exposure over the life of the related instruments. Calculations performed depend largely on observable market data. Market quoted counterparty and Bank's CDS spreads are used in order to derive the respective probability of default, a market standard recovery rate is assumed for developed market counterparties, correlations between market data are taken into account and subsequently a series of simulations is performed to model the portfolio exposure over the life of the related instruments. In the absence of observable market data, the counterparty probability of default and loss given default are determined using the Group's internal models for credit rating and collateral valuation. BCVA model is validated from an independent division of the Group according to best practices.

A breakdown of BCVA per counterparty sector and credit quality, as defined for the presentation purposes of the table "Loans by credit quality and IFRS 9 Stage" is given below:

	31.12.2020	31.12.2019
Category of counterparty		
Corporates	(3,809)	(1,319)
Governments	(20,745)	(11,963)

	31.12.2020	31.12.2019
Hierarchy of counterparty by credit quality		
Strong	(2,849)	(104)
Satisfactory	(21,705)	(12,300)
At default		(878)

324 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The table below presents the valuation methods used for the measurement of Level 3 fair value:

	31.12.2020			
	Total Fair Value	**Fair Value**	**Valuation Method**	**Significant Non-observable Inputs**
Bonds measured at fair value through other comprehensive income	1,018	1,018	Based on issuer price / Cash flow discount with an estimate of the bond yield	Issuer price
Shares measured at fair value through other comprehensive income	32,295	32,295	Discounted cash flows / Multiples valuation	Future profitability of the issuer, expected growth / Valuation ratios / Average weighted cost of capital
Bonds measured at fair value through profit or loss	12,408	12,408	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price / Credit spread
Shares measured at fair value through profit or loss	10,146	10,146	Discounted cash flows / Multiples valuation method / Expected transaction price	Future profitability of the issuer, expected growth/ Valuation ratios
Loans measured at fair value through profit or loss	280,882	280,882	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk	Expected loss and cash flows from counterparty' credit risk
Other receivables measured at fair value through profit or loss	40,000	40,000	Discounted cash flows of the underlying receivables portfolio	Cash Flows from the management of the underlying receivables portfolio

	31.12.2019			
	Total Fair Value	**Fair Value**	**Valuation Method**	**Significant Non-observable Inputs**
Derivative Financial Assets	980	980	Discounted cash flows with interest being the underlying instruments, taking into account the credit risk of the counterparty	The probability of default and loss given default of the counterparty used to calculate the adjustments due to credit risk (BCVA adjustment) calculated using an internal model.
			Discounted cash flows with interest rates being the underlying instrument	Assessment of the adequacy of reserves for the payment of hybrid securities dividends
Bonds measured at fair value through other comprehensive income	10,532	10,532	Based on issuer price / Discounted cash flows with estimation of bond yields	Issuer price/bond yields
Shares measured at fair value through other comprehensive income	41,913	41,913	Discounted cash flows / Multiples valuation	Future profitability of the issuer, expected growth / Valuation indices / WACC
Bonds measured at fair value through profit or loss	12,497	12,497	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price / Credit risk margin/ Assessment of reserve adequacy for payment of hybrid securities dividends
Shares measured at fair value through profit or loss	493	493	Discounted cash flows / Multiples valuation / Price of forthcoming transaction	Future profitability of the issuer, expected growth / Valuation ratios
Loans measured at fair value through profit or loss	307,136	307,136	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk and the operating cost	Cash flows from counterparty' credit risk

The Group recognizes the transfer between fair value hierarchy Levels at the end of each reporting period.

During the year, corporate bonds of Greek issuers were transferred from Level 1 to Level 2 in the total amount of € 49,166 due to the formation of the liquidity margin (bid-ask spread) outside the limit set for the classification of the market as active.

Within the previous year, a corporate bond was transferred from Level 2 to Level 3 of a total amount of € 1,127, as an internal model was used for its valuation.

Within the previous year, Greek corporate bonds amounted to € 1,978 were transferred from Level 2 to Level 1, as the liquidity margin (bid-ask spread) moved within the limit set for the characterization of market as active included in bonds portfolio measured at fair value through other comprehensive income regognised directly to equity.

325 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

A reconciliation for the movement of financial assets measured at fair value in Level 3 is depicted below:

	31.12.2020				
	Assets				
	Securities measured at fair value through other comprehensive income	**Securities measured at fair value through profit or loss**	**Loans measured at fair value through profit or loss**	**Derivative financial assets**	**Other receivables measured at fair value**
Balance 1.1.2020	**52,445**	**12,990**	**307,136**	**980**	**-**
Total gain or loss recognized in Income Statement	910	830	(20,194)	27	
- Interest	270	579	11,584		
- Gains less losses on financial transactions	55	251	(31,778)	27	
- Impairment losses	585				
Total gain/ (loss) recognized in Equity-Reserves	109				
Total gain or loss recognized in Equity-Retained Earnings	(892)				
Purchases / Disbursements	6,501	9.802	22,086		40,000
Sales			(9,221)		
Repayments	(11,182)	(1.068)	(18,925)		
Settlements				(1,007)	
Transfer to assets out of level 3 due to control acquisition	(14,100)				
Transfer to assets held for sale	(478)				
Balance 31.12.2020	**33,313**	**22,554**	**280,882**	**-**	**40,000**
Gain/(loss) included in the income statement and relate to financial instruments included in the balance sheet at the end of the reporting period 1.1 - 31.12.2020	3	656	(19,272)		
- Interest		572	10,920		
- Gains less losses on financial transactions	2	84	(30,192)		
- Impairment losses	1				

Other receivables measured at fair value through profit or loss relate to a receivable from a variable consideration of € 40,000 recognized in 2020, as mentioned in detail in in note 19.

326 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019			
	Assets			
	Securities measured at fair value through other comprehensive income	Securities measured at fair value through profit or loss	Loans measured at fair value through profit or loss	Derivative financial assets
Balance 1.1.2019	**79,085**	**9,984**	**318,460**	**16,663**
Total gain or loss recognized in Income Statement	627	3,185	(12,563)	(14,514)
- Interest	558	819	12,825	
- Gains less losses on financial transactions	33	2,369	(25,388)	(14,514)
- Impairment losses	36			
Total gain/ (loss) recognized in Equity-Reserves	(9)			
Total gain or loss recognized in Equity-Retained Earnings	(21,437)			
Purchases / Disbursements	427	334	74,338	
Repayments	(4,141)	(513)	(73,099)	(462)
Settlements				(707)
Transfer in Level 3 from Level 2	1,127			
Transfer to assets held for sale	(3,234)	(3)		
Balance 31.12.2019	**52,445**	**12,990**	**307,136**	**980**
Gain/(loss) included in the income statement and relate to financial instruments included in the balance sheet at the end of the reporting period 1.1 - 31.12.2019	627	3,055	(18,876)	51
- Interest	558	551	10,572	
- Gains less losses on financial transactions	33	2,504	(29,448)	51
- Impairment losses	36			

During 2019, bonds amounting to € 1,127 were transferred from Level 2 to Level 3, since an internal model was used for valuation purposes.

327 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

A sensitivity anlaysis of financial instruments classified at Level 3 whose valuation was based on significant unobservable data as at 31.12.2020 is presented below:

	Significant Non-observable inputs	Quantitative informationon non-observable inputs	Non-observable inputs change	Total effect in income statement		Total effect in Equity	
				Favourable variation	Unfavourable variation	Favourable variation	Unfavourable variation
Bonds measured at fair value through other comprehensive income	Issuer price	Issuer price equal to 97,11%	Variation +/-10% in issuer price			102	(102)
Shares measured at fair value through other comprehensive income	Future profitability of issuer, expected growth / Valuation indexes/ Weighted average cost of capital	Valuation indexes P/BV 0,28x, Valuation indexes P/BV 0,903x WACC +-1%	Variation +/-10% in P/B and EV/Sales multiples valuation method. Wacc +/-1%			590	(589)
Bonds measured at fair value through profit or loss	Issuer price/ credit spread	Issuer price equal to 88.61% / Average credit spread equal to 948 bps.	Variation +/- 10% in issuer Price, -/+ 10% in adjustment of estimated / Credit Risk	1,074	(1,069)		
Loans measured at fair value through profit or loss	Expected credit loss and cash flows from credit risk of the counterparty	Average credit spread and liquidity premium equal to 36.66%	Decrease of the expected cash flows by 10% on loans individually assessed		(12,986)		
Shares measured at fair value through profit or loss	Valuation indexes	Adjustment of cash flows discount based on the Buyer's business plan (expected average percentage of completion 90%)	Business plan percentage of completion: application of scenarios of change of the expected cash flows of BP by +/-35%	1,900	(2,500)		
Other receivables measured at fair value through profit or loss	Cash flows from management of subject receivables portfolio	Value of property collateral € 607.6 mil. And third party receivables € 42.4 mil.	Variation +/-4% to property collateral valuation. Variation +/- 33% to third party receivables	9,000	(7,000)		
Total				**11,974**	**(23.555)**	**692**	**(691)**

328 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

A sensitivity analysis of financial instruments classified at Level 3 whose valuation was based on significant unobservable data as at 31.12.2019 is depicted below:

	Significant Non-observable inputs	Quantitative information on non-observable inputs	Non-observable inputs change	Total effect in income statement		Total effect in Equity	
				Favourable variation	Unfavourable variation	Favourable variation	Unfavourable variation
Derivative Financial Assets	The probability of default and loss given default of the counterparty used to calculate the adjustments due to credit risk (BCVA adjustment) calculated using an internal model	Average probability of default equal to 100% and average loss in the case of default of counterparty equal to 56%	Increase the probability of default through reduction of internal ratings by 2 scales / increase the loss given default by 10%		(156)		
	Assessment of the adequacy of reserves for the payment of hybrid securities dividends	From 2022 to maturity, probability 100%	Increase the probability of dividend payments to 100%		1		
Bonds measured at fair value through other comprehensive income	Issuer price – Bond yield	Issuer price equal to 94.01% / Bond yield equal to 9.318%	Variation +/-10% in issuer price, Variation -/+10% in estimated return			273	(269)
Shares measured at fair value through other comprehensive income	Future profitability of issuer, expected growth / Valuation indexes	Valuation indexes P/BV 0.41x, 0.956x and EV / Sales 15,867x. WACC +-1%	Applying variation +-10% in valuation indexes P/B & EV /Sales Varied WACC by ±1%			653	(652)
Bonds measured at fair value through profit or loss	Issuer price/credit spread	Average issuer price equal to 89.74% / Average credit spread equal to 1408 bps	Variation +/- 10% in issuer Price, -/+ 10% in adjustment of estimated / Credit Risk	1,083	(1,070)		
Loans and advances to customers measured at fair value	Expected credit loss and cash flows from credit risk of the counterparty	Average credit spread, liquidity premium & operating risk equal to 32.91%	Decrease of the expected cash flows by 10% on loans individually assessed.		(8,682)		
Total				**(1,083)**	**(9,908)**	**926**	**(921)**

There are no significant interrelationship between the non-observable data that significantly affect the fair value.

329 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

43.5 Transfers of financial assets

The Group in its ordinary course of business, transfers financial assets. In cases that, despite the fact that the contractual right to receive cash flows has been transferred the risks and rewards remain with the Group, these assets continue to be recognized on the balance sheet.

On 31.12.2020, the financial assets that have not been derecognized despite the contractual transfer of their cash flows, are derived from the following two categories of transactions:

a) Securitizations of financial assets

The Bank has securitized corporate and revolving consumer loans and credit cards while its subsidiary Alpha Leasing A.E. finance lease receivables, in order to draw liquidity from the Euro system. In the context of these transactions, these assets have been transferred to special purpose entities fully consolidated by the Group, which have proceeded to the issuance of bonds. These securitized financial assets continue to be recognized as loans and advances to customers, since the Group continues in all cases to retain the rewards and risks associated with them. This is justified by several factors which include the full consolidation of special purpose entities, the fact that the Bank owns these bonds and has the entitlement to receive the deferred consideration from the transfer. Given that bonds are owned by the Group, there is no liability for the Group which actually arises from the transfer. The carrying amount of the securitized loans and credit cards on 31.12.2020 amounts to € 1,597,957 (31.12.2019: € 2,565,960).

In addition, the Bank has securitized retail loans through the fully consolidated special purpose entity Katanalotika Plc. In this case also, retail loans are still recognized in the Group's balance sheet as the Group retains their risks and rewards through the ownership of bonds as well as the right to collect the deferred consideration. Within the fourth quarter of the fiscal year 2019 part of the bonds issued by the special purpose entity was transferred to third parties, while within the fourth quarter of the fiscal year 2020 the Bank repurchased these bonds on 31.12.2020 resulting to no liability of the Group on 31.12.2020 from the said transfer. On 31.12.2020 the carrying amount of these securitized loans amounts to € 493,145. (31.12.2019: € 499,242). On 31.12.2019 the carrying amount of the Group's liability to the special purpose entity amounted to € 220,090 and the fair value of the loans and the liability to the special purpose entity amounted to € 476,919 and € 209,726 respectively.

In addition, the Bank has proceeded to a shipping loans securitization transaction through the fully consolidated special purpose entity Alpha Shipping Finance Ltd. These loans are recognized in the category of loans and advances to customers as the Group retains the risks and rewards of the portfolio through its right to receive the deferred consideration. On 21.9.2020 the Bank acquired all the liabilities of the special purpose entity held by third parties, as a result of which it is the only lender of the special purpose entity Alpha Shipping Finance Ltd. Therefore, as at 31.12.2020, there is no liability of the Group from the transfer of shipping loans.The carrying amount of the securitized shipping loans as at 31.12.2020 amounted to € 206,787 (31.12.2019: € 335,594). The carrying amount of the securitized third party liabilities as at 31.12.2019 amounted to € 154.936 while the fair value of the loans and and liability to the special purpose entity amounted to € 334,613 and € 154,525 respectively.

Moreover, the Bank had securitized corporate loans to small and medium enterprises, through Alpha Proodos DAC, a fully consolidated special purpose entity. These loans continue to be recognized in loans and advances to customers considering that the Group retains the risks and rewards of these, by owning the subordinated bonds and the entitlement of deferred consideration.

This transaction was recalled within the fourth quarter of the fiscal year 2020 with the repayment of all Alpha Proodos DAC bonds owned by the Bank.

The carrying value of the above securitized loans amounts to € 256,227 as at 31.12.2019, whereasthe total amount of the bonds issued from the special purpose entity, are owned by the Bank and therefore, there was no liability under the transfer.

Finally, in the context of the implementation of its strategic plan 2020 -2022 (note 51), on 30.4.2020, the Bank entered into a securitization transaction of non-performing retail and business loans. Loans were transferred to the fully consolidated special purpose entities Orion X Securitisation Designated Activity Company, Galaxy II Funding Designated Activity Company, Galaxy III

Funding Designated Activity Company and Galaxy IV Funding Designated Activity Company, established in Ireland.

In this case also, loans continue to be recognized in the Group's balance sheet as at the date of the financial statements as the Group retains the risks and rewards through the ownership of the bonds issued by the above special purpose entities. The book value of these securitized receivables as at 31.12.2020 amounted to € 6,148,287.

b) Sale and repurchase agreements of debt securities

The Group as at 31.12.2020 has proceeded with the transfer of Greek Government Bonds and Treasury bills, other issuers' bonds and bonds of other countries with a repurchase agreement. These securities are recognized in the Group's trade and investment portfolio and the respective amounts are presented in the following tables.

	31.12.2020				
	Securities measured at fair value through other comprehensive income			Securities measured at amortized cost	Trading portfolio securities
	Greek Government Bonds & Treasury Bills	Other Sovereign Bonds	Other Issuers' Bonds	Greek Government Bonds & Treasury Bills	Greek Government Bonds & Treasury Bills
Carrying amount of transferred securities	154,720	1,942	47,937	201,836	5,138
Carrying amount of related liability	(150,659)	(1,716)	(36,233)	(199,982)	(4,523)
Fair value of transferred securities	154,720	1,942	47,937	214,249	5,138
Fair value of related liability	(150,659)	(1,716)	(36,233)	(199,982)	(4,523)
Carrying amount of transferred securities	**4,061**	**226**	**11,704**	**14,267**	**615**

The Group on 31.12.2019 had proceeded with the transfer of Greek Government Bonds and Treasury Bills, other issuers's bonds, bonds of other countries with a repurchase agreement. These securities are still included in the Group's investment portfolio and the respective figures are presented in the following table.

	31.12.2019			
	Securities measured at fair value through other comprehensive income			Securities measured at amortized cost
	Greek Government Bonds & Treasury Bills	Other Sovereign Bonds	Other Issuers' Bonds	Greek Government Bonds & Treasury Bills
Carrying amount of transferred securities	3,297,872	701,832	40,797	740,581
Carrying amount of related liability	(2,742,413)	(676,412)	(37,927)	(638,324)
Fair value of transferred securities	3,297,872	701,832	40,797	748,433
Fair value of related liability	(2,742,413)	(676,412)	(37,927)	(638,324)
Carrying amount of transferred securities	**555,459**	**25,420**	**2,870**	**110,109**

331 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

43.6 Offsetting financial assets - liabilities

The following tables present derivative transactions under International Swaps and Derivatives Association (ISDA) contracts which are signed with credit institutions as counterparties, as well as repurchase agreements for which a global master repurchase agreement is in force. In accordance with these contracts, the Group is able to offset its assets and liabilities relating to a counterparty in case of a credit default.

Financial assets subject to offsetting

	31.12.2020					
	Gross amount of recognized financial assets	Gross amount of recognized financial liabilities offset	Net amount of financial assets presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral received	
Derivatives	1,086,363		1,086,363	(236,577)	(873)	848,914
Reverse repos	240,025		240,025	(240,025)		

	31.12.2019					
	Gross amount of recognized financial assets	Gross amount of recognized financial liabilities offset	Net amount of financial assets presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral received	
Derivatives	835,443		835,443	(201,833)	(6,497)	627,113
Reverse repos	1,164,950		1,164,950	(1,164,950)		

Financial liabilities subject to offsetting

	31.12.2020					
	Gross amount of recognized financial liabilities	Gross amount of recognized financial assets offset	Net amount of financial liabilities presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral given	
Derivatives	1,754,271		1,754,271	(236,577)	(1,509,258)	8,436
Repos	239,973		239,973	(239,973)	629	629

	31.12.2019					
	Gross amount of recognized financial liabilities	Gross amount of recognized financial assets offset	Net amount of financial liabilities presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral given	
Derivatives	1,445,980		1,445,980	(201,833)	(1,243,517)	631
Repos	1,551,811		1,551,811	(1,164,950)	(1,841)	385,020

332 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of the net amount of financial assets and liabilities presented in the balance sheet

	31.12.2020			
	Note	Net amount presented in the balance sheet	Carrying amount of financial assets in the balance sheet	Financial assets not in scope of offsetting disclosures
Type of financial asset				
Derivative financial instruments	18	1,086,363	1,267,083	180,719
Reverse repos	16	240,025	240,025	0

	31.12.2020			
	Note	Net amount presented in the balance sheet	Carrying amount of financial liabilities in the balance sheet	Financial liabilities not in scope of offsetting disclosures
Type of financial liability				
Derivative financial instruments	18	1,754,271	1,768,317	14,047
Repos	27	239,973	526,431	286,458

	31.12.2019			
	Note	Net amount presented in the balance sheet	Carrying amount of financial assets in the balance sheet	Financial assets not in scope of offsetting disclosures
Type of financial asset				
Derivative financial instruments	18	835,443	1,009,193	173,750
Reverse repos	16	1,164,950	1,164,950	

	31.12.2019			
	Note	Net amount presented in the balance sheet	Carrying amount of financial liabilities in the balance sheet	Financial liabilities not in scope of offsetting disclosures
Type of financial liability				
Derivative financial instruments	18	1,445,980	1,446,915	935
Repos	27	1,551,811	6,278,456	4,726,645

In addition, it is disclosed that within the framework of the abovementioned contracts, apart from the cash collateral received, securities of nominal amount of € 900,000 (31.12.2019: € 870,000) have been used as collateral.

44. Capital Adequacy

The policy of the Group is to maintain strong capital ratios and ample buffers over requirements in order to ensure the delivery of Alpha Bank's strategy and the development and trust of depositors, shareholders, markets and business partners.

Share capital increases are conducted following resolutions of the General Meeting of Shareholders of Board of Directors, in accordance with articles of incorporation or relevant laws.

For the period that the Hellenic Financial Stability Fund (HFSF) participates in the Share Capital of the Bank, the purchase of own shares is not allowed without its approval, according to the Relationship Framework Agreement (RFA) which has been signed between the Bank and the HFSF.

The Capital Adequacy ratio compares the Group's regulatory capital with the risks that it undertakes (Risk Weighted Assets - RWAs). Regulatory capital includes Common Equity Tier 1 (CET1) capital (share capital, reserves, minority interests), additional Tier 1 capital (hybrid securities) and Tier 2 capital (subordinated debt). RWAs include the credit risk of the investment portfolio, the market risk of the trading book and the operational risk.

Alpha Bank, as a systemic bank, is supervised by the Single Supervisory Mechanism (SSM) of the European Central Bank (ECB), since November 2014, to which reports are submitted every quarter. The supervision is conducted in accordance with the European Regulation 575/2013 (CRR) and the relevant European Directive 2013/36 (CRD IV), which was incorporated into the Greek Law through the Law 4261/2014. The framework is broadly known as Basel III.

333 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

For the calculation of capital adequacy ratio the above regulatory framework is followed. In addition:

- Besides the 8% capital adequacy limit, there are applicable limits of 4.5% for CET 1 ratio and 6% for Tier 1 ratio respectively
- The maintenance of capital buffers additional to the CET1 capital are required. In particular:
- Capital conservation buffer stands at 2.5%.
- Bank of Greece through Executive Committee Acts set the following capital buffers:
  - Countercyclical capital buffer equal to "zero percent" (0%) for 2020
  - Other systemically important institutions (O-SII) buffer, which will gradually rise to "one percent" (1%) from 1.1.2019 to 1.1.2023. For 2020, the O-SII buffer stands at 0.5%.

These limits should be met both on a standalone and on consolidated basis.

The following table presents the capital adequacy ratios of the Group:

	31.12.2020	31.12.2020 (pro-forma)*	31.12.2019
Common Equity Tier I Ratio	17.1%	17.3%	17.9%
Tier I Ratio	17.1%	17.3%	17.9%
Capital Adequacy Ratio**	**18.2%**	**18.4%**	**17.9%**

On 28 December 2020, the ECB informed Alpha Bank that since 31st January 2021 the minimum limit for the Overall Capital Requirement (OCR) remains unchanged from 2020 at 14%. The OCR is composed by the minimum own funds requirements (8%), according to article 92(1) of the CRR, the additional Pillar II own funds requirements (P2R), according to article 16(2) (a) of the Regulation 1024/2013/EU which corresponds to 3%, and the combined buffer requirements (CBR), according to article 128(6) of the Directive 2013/36/EU which correspond to 3%. The above minimum ratio should be maintained on a phase-in basis under applicable transitional rules of the CRR/CRD IV, at all times.

On February 13th 2020, Alpha Bank issued a Euro 500 million, Tier 2 bond with 10-year maturity callable after 5 years at a yield of 4.25%, listed on the Luxembourg Stock Exchange.

On March 4th 2021, Alpha Bank placed a Euro 500 million, Tier 2 bond aiming to maintain strong capital ratios and ample buffers over requirements. The subordinated bond has a 10.25-year maturity and is callable anytime between year 5 and year 5.25 with a coupon of 5.5%. The bond is listed on the Luxembourg Stock Exchange – EuroMTF Market.

Measures taken for the banks in order to tackle Covid-19 pandemic

As per the announced regulatory measures by European Banking Authority (EBA) and ECB, in view of the Covid-19 outbreak, decided that European banking institutions can temporarily deviate from the minimum capital regulatory thresholds.

Both ECB and SSM took measures, to tackle the Covid-19 pandemic, in order for them to continue finance the economy and fulfil their role.

Specifically, on 12 March, the ECB and the EBA announced the following relaxation measures for the minimum capital requirements for Banks in the Eurozone:

- Banks are temporarily allowed to operate below the level of capital defined by the Capital Conservation Buffer and the Countercyclical Buffer. In addition, on 28 July 2020, the ECB announced through a press release that financial institutions are allowed to operate below the aforementioned thresholds at least up to the end of 2022.
- Furthermore, the upcoming change under CRD V regarding the P2R buffer was brought forward allowing the Pillar 2 requirement (P2R) to be covered by Additional Tier 1 (AT1) capital by 18.75% and Tier 2 (T2) capital by 25% and not only by CET 1.

The European Commission decided to revise the existing regulatory framework by bringing forward regulations that would normally come with the CRR2/CRDV framework as well as provide a greater flexibility to the phase-in of the impact of the IFRS 9 on capital. The revised framework was published in the Official Journal of the European Union as at June 22, 2020.

* On the above mentioned ratios have also been included the profit for the year

** Supervisory disclosures regarding capital adequacy and risk management in accordance with Regulation 575/2013 (Pillar III) will be published on the Bank's website.

334 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In 22 December 2020, EU Regulation 2176/2020 of the Council of 12 November 2020, amending EU Regulation 241/2014 concerning the deduction of software assets from CET1 capital, was published in the Official Journal of the European Union.

In 26 June 2020, the Bank of Greece under an Executive Committee Act determined the capital buffer of systemically important institutions (O-SII) at 0,50%, maintaining stable for 2021 and extending consequently the existing phasing-in period. The third and the fourth phases have been delayed by 12 months each and will apply starting from 1 January 2022 and 1 January 2023 respectively. This decision is in the context of the response to Covid-19 pandemic in order to mitigate the subsequent financial impact.

Stress Test

EU-wide stress test is primarily focused on the assessment of the impact of risk drivers on the solvency of banks. Banks are required to stress a common set of risks (credit risk – including securitisations – market risk and counterparty credit risk, operational risk – including conduct risk). The EU – Stress Test is a biannual exercise. However due to the outbreak of Covid-19 (Coronavirus) and its global spread, EBA decided to postpone until 2021 the EU-wide Stress Test Exercise of 2020 to allow banks to focus on and ensure continuity of their core operations. For 2020, the EBA carried out additional EU-wide transparency exercise in order to provide updated information on banks' exposures and asset quality to market participants. On 21.12.2020, SSM announced that the EU-wide Stress Test is to be launched in 29 January 2021 and its results will be published at the end of July 2021.

45. Related-party transactions

The Bank and the other companies of the Group enter into a number of transactions with related parties in the normal course of business. These transactions are performed at arm's length and are approved by the respective bodies.

a. The outstanding balances of the Group's transactions with key management personnel consisting of members of the Bank's Board of Directors and the Executive Committee, their close family members and the entities controlled by them, as well as, the results related to these transactions are as follows:

	31.12.2020	31.12.2019
Assets		
Loans and advances to customers	1,792	1,759
Liabilities		
Due to customers	4,302	3,176
Employee defined benefit obligations	219	277
Provisions	650	1,253
Total	**5,171**	**4,706**
Letters of guarantee and approved limits	2,159	2,059

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Interest and similar income	38	41
Fee and commission income	8	5
Other income	1	1
Total	**47**	**47**
Expenses		
Interest expense and similar charges	7	19
Commission expenses	1	1
General administrative expenses		1
Remuneration paid to key management and close family members	5,826	5,846
Total	**5,834**	**5,867**

335 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

According to the decision of the General Meeting of Shareholders held at 29.6.2018, a compensation scheme is operating for the Bank's Senior Management, the terms of which were specified through a Regulation issued subsequently. The program is voluntary, does not constitute business practice and the program may be terminated in the future by a decision of the General Meeting of the Shareholders. It provides incentives for the eligible personnel to comply with the terms of departure, proposed by the Bank, thus ensuring the smooth (only during the period and under the terms and conditions approved by the Bank) departure and succession of Senior Management.

b. The outstanding balances with the Group's, associates and joint ventures as well as the results related to these transactions are as follows:

	31.12.2020	31.12.2019
Assets		
Loans and advances to customers	64,459	61,857
Other Assets	1,490	1,046
Total	**65,949**	**62,903**

	31.12.2020	31.12.2019
Liabilities		
Due to customers	14,561	18,670
Other Liabilities		2,265
Total	**14,561**	**20,935**

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Interest and similar income	1,323	1,723
Fee and commission income	2	4
Gains less losses on financial transactions	2,982	2,225
Other income	188	183
Total	**4,495**	**4,135**
Expenses		
Interest expense and similar charges	2	17
General administrative expenses	5,844	16,067
Total	**5,846**	**16,084**

c. The Hellenic Financial Stability Fund (HFSF) exerts significant influence on the Bank. In particular, in the context of Law 3864/2010 and based to Relationship Framework Agreement ("RFA") signed on 23.11.2015, which replaced the previous one signed in 2013, HFSF has participation in the Board of Directors and other significant Committees of the Bank. Therefore, according to IAS 24, HFSF and its related entities are considered related parties for the Bank.

The outstanding balances and the results related to these transactions are analyzed as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Fee and commission income	4	8

336 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

46. Auditors' fees

The total fees of "Deloitte Certified Public Accountants S.A.", statutory auditor of the Bank, are analyzed below, in accordance with the provisions of paragraph 2 and 32, article 29 of Law 4308/2014.

	From 1 January to	
	31.12.2020	31.12.2019
Statutory audit of the annual accounts*	2,051	1,770
Other audit services		13
Issuance of tax certificate	423	363
Other non-audit services	195	355
Total	**2,699**	**2,501**

47. Disclosures of Law 4151/2013

The purpose of the provisions of chapter B of Law 4151/2013 is the funds from dormant deposit accounts to be used by the Greek State to cover government needs, after the write off of rights of depositors or their legal heirs. According to the aforementioned the provisions of Law 4151/2013:

i. Dormant deposit account to credit Institution, according to the provisions of Law 4261/2014, is an account on which no transaction by depositors has been recorded for a period of 20 years from the day following the last transaction (the crediting or capitalizing of interest to an account will not constitute a transaction and not interrupt the prescription),

ii. Following the expiry of the 20-year period, the credit institutions in Greece are obliged to transfer to the Greek State the aggregate balance of dormant deposit accounts, including any interest, by the end of April of each year by making a deposit of the relevant amount in a special account held in Bank of Greece, notify the General Accounting Office (GAO) and the General Directorate of Public Property to fulfill the obligations arising from the Law 4151/2013 and to provide information to beneficiaries and heirs after the lapse of 20 years for the transfer of the respective amounts, if requested (the abovementioned amounts, in total, will be recorded as income in the Annual State Budget),

iii. the statutory auditors in the notes to the published annual financial statements of credit institutions will confirm whether or not the financial institution complied with the provisions of the law for dormant deposits indicating the amount that was attributed to the Greek State.

For the fiscal year 2019 the Bank proceeded, at the end of April 2020, to the transfer of the balances of the dormant deposit accounts to the State (principals and relevant interest of deposits), of a total amount of € 4,156 on which the rights of depositors / heirs were written off in favor of the State until 31.12.2019, according to Law 4151/2013 and due to the suspension of the deadline for the completion of this twenty-year limitation period, pursuant to the 18.07.2015 CIP (Government Gazette B 84 / 18.07.2015), as it was in force through all its amendments, combined with no. 257 AK.

For the fiscal year 2020, the amount of inactive deposit accounts that will be given from the Bank to the Greek State within the year 2021, due to the limitation of these rights, according to Law 4151/2013, until 31.12.2020, is estimated in the amount of € 3,787.

* Statutory audit of the annual accounts include expenses amounting up to 2% of the approved fees.

337 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

48. Assets held for sale

	31.12.2020	31.12.2019
APE Commercial Property A.E., APE Investment Property A.E.	42,300	46,217
Alpha Investment Property Attikis II A.E.	23,853	23,359
Alpha Investment Property Gi I A.E.		25,000
AGI-Cypre Alaminos Ltd		4,412
AGI-Cypre Property 10 Ltd	864	
AGI-Cypre Property 12 Ltd	917	
ABC RE P1 Ltd	1,335	
ABC RE P2 Ltd	2,063	2,056
ABC RE P4 Ltd	735	742
Fierton Ltd	6,442	
AGI-BRE Participations 3 EOOD		11,748
Portfolio of non performing loans	143,318	431,688
Assets of Alpha Bank S.A.	435	14,119
Investment Property of Alpha Leasing A.E.	4,354	97
Investment property of Alpha Investment Property Spaton A.E	11,678	
Investment Property AGI-Cypre P&F Limassol Ltd	95	
Investment Property AGI-Cypre Property 24 Ltd	185	
Investment Property ABC RE COM Pafos Ltd	-	281
Investment Property AGI-Cypre P&F Larnaca Ltd	111	
Fixed Assets of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd	123	1,562
Other assets held for sale	1,535	2,238
Total	**240,343**	**563,519**

	31.12.2020	31.12.2019
Liabilities related to assets held for sale		
Alpha Investment Property Attikis II A.E.	142	145
Alpha Investment Property Gi I A.E.		125
AGI-Cypre Alaminos Ltd		5
AGI-Cypre Property 10 Ltd	3	
AGI-Cypre Property 12 Ltd	16	
ABC RE P1 Ltd	15	
ABC RE P2 Ltd	16	21
ABC RE P4 Ltd	13	10
Fierton Ltd	46	
AGI-BRE Participations 3 EOOD		495
Total	**251**	**801**

The Group had commenced the process for the partial sale of the investments in specific subsidiaries and joint ventures, part of non performing retail and wholesale loan portfolio, as well as property and other fixed assets of the Bank and specific subsidiaries for which the provisions to be classified as "Assets held for sale" in accordance with IFRS 5 are fullfilled. The balances of them are presented in the table above and described in detail below.

In accordance with IFRS 5 Assets held for sale or disposal groups held for sale are valued at the lower between their carrying amount and fair value less costs to sell and are presented in the balance sheet separately from the other assets and liabilities.

It is noted that during 2020, the sale of the subsidiaries AGI-Cypre Alaminos Ltd in Cyprus, AGI-BRE Participations 3 EOOD in Bulgaria and the subsidiary in Greece AEP GI I A.E. which were classified as assets held for sale during 2019, as well as the sale of the subsidiaries in Cyprus ABC RE L1 Ltd and AGI-Cypre Property 3 Ltd which had been classified as assets held for sale during 2020, were completed.

338 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

As mentioned below, during the year the Bank's participations in APE Commercial Property S.A. were reclassified in "Investments in associates and joint ventures" as the criteria of IFRS 5 are no longer met for their classification in "Assets held for sale". The Bank did not restate the comparative period as detailed in note50.

The most significant assets of the companies above that have been classified in the category "Assets for sale" concern investment properties.

APE Commercial Property A.E. and APE Investment Property A.E.

The Group is at an advanced stage of the process of selling its participation in the joint venture APE Investment Property S.A. with a carrying amount of € 42,300 on 31.12.2020 (31.12.2019: € 42.300). On 2.2.2021 the binding agreement for the transfer of the Bank's shares to APE Investment Property S.A. was signed. The Bank proceeded to the determination of the fair value of its participation and from the valuation no result was recognized for the years 2020 and 2019.

As the company is not a separate important part of the business activity for the Group, the conditions for its characterization as a discontinued operation are not met. The company is included in "Other / Deletion Center" segment for information purposes by operational segment.

Regarding APE Commercial Property S.A. which in previous years was classified in "Assets held for sale", the conditions for its classification are not met and this led to its reclassification into "Investments in associates and joint ventures", as the Bank intends to put the company into liquidation in the near future and it is not expected to be sold. The effect of the reclassification is described in note 50.

In the table below an analysis of the assets and liabilities of APE Investment Property A.E. and APE Commercial Property A.E. (for comparative period only) which are classified in the Balance Sheet as assets held for sale is depicted.

	31.12.2020	31.12.2019
ASSETS		
Investments in associates and joint ventures	42,300	58,961
Valuation at fair value		(12,744)
Total Assets held for sale	**42,300**	**46,217**
Amounts recognized directly in Equity related to assets held for sale		**(122)**

Alpha Investment Property Attikis II A.E.& AEP GI I A.E.

During the year 2019 the process of obtaining binding offers for the sale of the total shares of Alpha Investment Property Attikis II A.E. was completed and the transaction was completed on 12.2.2021.

In addition, on 24.12.2020 the transfer of shares of the group subsidiary AEP GI I A.E. was completed for a consideration of one euro, while the receivable of the Bank against the company was also transferred for a consideration of € 25,263. As a result of the above a profit amounting to € 1,682 was recognized in "Gains less losses on financial transactions".

From their measurement per IFRS 5, no impact in the income statement as of 31.12.2019 occured.

Taking into account that the companies were not separate major lines of business of the Group, the criteria to be classified as discontinued operations were not met. The companies are included in operating segment "Other/Elimination Center" for operating segment disclosure purposes.

AGI-Cypre Alaminos Ltd, ABC RE P2 Ltd, ABC RE P4 Ltd, AGI-Cypre Property 2 Ltd, ABC RE L1 Ltd, AGI-CYPRE PROPERTY 3 Ltd, Fierton Ltd, ABC RE P1 Ltd AGI Cypre Property 10 Ltd & AGI-Cypre Property 12 Ltd

During 2019 the Group began the process of disposing its subsidiaries in Cyprus AGI-Cypre Alaminos Ltd, ABC RE P2 Ltd and ABC RE P4 Ltd while during 2020 it began the process of disposing the subsidiaries in Cyprus AGI-Cypre Property 2 Ltd, ABC RE L1 Ltd and Fierton Ltd, AGI-Cypre Property 3 Ltd, AGI Cypre Property 10 Ltd & AGI-Cypre Property 12 Ltd.

Especially for AGI-Cypre Alaminos Ltd, on 14.11.2019, a sale agreement was signed for the total of its shares, and the sale was completed on 07.01.2020. The consideration of the transaction amounted to € 4,686, and a gain of € 127 was recognized in "Gains less losses on financial transactions"

339 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Additionally, on 5.8.2020 the disposal of the shares of ABC RE L1 Ltd was completed for a consideration of € 950, and a gain of € 151 was recognized in "Gains less losses on financial transactions".

On 6.11.2020, the disposal of the shares of AGI-Cypre Property 3 Ltd was completed for a consideration of € 380 and a loss of € 31 was recognized in "Gains less losses on financial transactions".

From the measurement of the entities per IFRS 5 there was no impact for ABC RE P2 Ltd, AGI-Cypre Property 2 Ltd and Fierton Ltd and ABC RE L1 Ltd. However, a loss amounting to € 26 was recognized in 2019 and a loss amounting to € 12 were recognized in "Gains less losses on financial transactions" in the Income Statement for ABC RE P4 Ltd. In addition, in the same income statement caption, a loss amounting to € 35 and € 31 was recognized for AGI Cypre Property 10 Ltd and AGI-Cypre Property 12 Ltd respectively.

Taking into account that the companies do not comprise a separate major line of business of the Group, the criteria to be classified as discontinued operations are not met. These companies are included in segment "S.E. Europe" for operating segment disclosure purposes.

Finally, the company AGI-Cypre Property 2 Ltd, which during the year 2020 was classified as held for sale, on 31.12.2020 does not meet the conditions for classification as asset held for sale and therefore was reclassified to the Balance Sheet without any impact on the consolidated results from the said reclassification.

AGI-BRE Participations 3 EOOD

In 2019 the Group initiated the procedure in order to sell AGI-BRE Participations 3 EOOD. In particular, on 18.12.2019, a pre-sale agreement concerning the total amount of its shares was signed and the completion of the transaction is expected to take place during 2020.

According to IFRS 5, the above company was classified as Held for sale. From its measurement no impact in the income statement occured.

Taking into account that the company is not a separate major line of business of the Group, the criteria to be classified as discontinued operations are not met. The company is included in the operating segment "Other/Elimination Center" for operating segment disclosure purposes.

On 30.6.2020 the transaction of sale of the shares of the company was completed for a collected consideration of € 10.5 million, and a contingent consideration of € 2.4 million to be collected over a 5 years period which is measured at fair value. A loss of € 233 was recognized in "Gains less losses on financial transactions".

Non-performing loans portfolio

Loan Portfolio A: Non-performing loans with collaterals

During 2019, the Bank initiated the process of the sale of Non-performing loans with collaterals in real property, as well as other receivables, with carrying amount of € 409,118 as of 31.12.2019, which included receivables from consumer loans, wholesale loans, shipping loans and mortgage loans.

Regarding this portfolio, on 1.7.2020 the Bank entered into a binding agreement for the partial sale of a portfolio with a carrying amount of € 261,254 while a provision of € 25,000 was recognized by the Bank with regards to claimed receivables related to the sold loan portfolio. The transaction was completed on 17.7.2020. The consideration of the transaction for the transferred portfolio, as adjusted after transaction costs, amounted to € 261,274. In addition, the consideration of the transaction includes a variable consideration, the fair value of which was determined at € 40,000, as at 31.12.2020. The result from the sale of the portfolio amounted to a profit of € 20 and is recognised in "Gain less losses on derecognition of financial assets measured at amortised cost".

The remaining portfolio remains in the category "Assets held for sale" it met the conditions for its classification as "held for sale" according to IFRS 5 as at 31.12.2020 and the Bank is expected to complete its sale within the first half of 2021.

From the aforementioned portfolio an amount of € 131,095 (31.12.2019: € 392,259) is included in the operating segment "Corporate Banking" and an amount of € 2,223 (31.12.2019: € 16,859) is included in the operating segment "Retail" of note 42 "Operating Segments".

Loan Portfolio B: Non-performing loans with collaterals

During the year 2019, the Bank initiated the process of the sale of Non-performing loans of a carrying amount of € 9,618 as of 31.12.2019 which included receivables from wholesale loans.

This aforementioned loan portfolio was sold in the third quarter of 2020. The consideration of the transaction, adjusted after transaction costs was € 9,358 while the result from the sale of the portfolio amounted to a loss of € 635 and is presented in "Gain less losses on derecognition of financial assets measured at amortised cost".

These loans were included in the operating segment "Corporate Banking" of note 42"Operating Segments".

Loan Portfolio C: Non-performing wholesale loans in Greece

During the year 2018, the Group commenced the process of the sale of Greek Non-Performing Wholesale Loans.

On 27.12.2018, the transfer of a part of the above portfolio was completed. The consideration for the transferred portfolio, as adjusted after transaction costs and other liabilities, amounted to € 258,833, while a loss of € 17,659 was recognized in "Gain less losses on derecognition of financial assets measured at amortised cost". The carrying amount of the remaining portfolio was € 38,008 as of 31.12.2019.

On 24.12.2020 the transfer of a part of the remaining portfolio was completed. The consideration for the transferred portfolio, as adjusted after transaction costs and other liabilities, amounted to € 8,071, while a loss of € 358 was recognized in "Gains less losses on financial transactions". The remaining portfolio is included in "Assets held for sale" according to IFRS 5 and the Bank is expected to complete its sale the first half of 2021.

The abovementioned portfolio amounting to € 10,000 (31.12.2019 € 12,952) included in the operational segment "Corporate Banking" while as at 31.12.2019 an amount of € 25,056 was included in the operational segment "Other / Elimination Center" of note 42 "Operating Segments".

Property of Alpha Bank S.A. and Alpha Leasing S.A.

In 2018, the Bank and Alpha Leasing S.A. initiated the process of disposing of a portfolio consisting of both investment property, own used property and assets obtained from auctions. During the year of 2019, the sale of a part of the investment property, was completed for a total consideration of € 50,738 while a gain amounting to € 1,773 was recognized in "Other income" in the Income Statement.

During the year 2020, the sale of two of the remaining properties of the Bank for a total consideration of € 11,128 was completed, while a profit of € 138 was recognized in "Other Income" and a loss of € 11 in "Other Expenses". The remaining properties as of 31.12.2020 with a carrying amount of € 3,125 did not meet the criteria for their classification as "assets held for sale" in accordance with IFRS 5 and there were transferred to "Other Assets", while a property of a carrying amount of € 435 was transferred from "Investment property" to "Assets held for Sale" since a pre-sale agreement has been signed.

In addition, within 2020, the sale of five of Alpha Leasing properties for a consideration of € 2,183 was completed, recognizing a profit of € 47 in "Other Income" in the Income Statement, while four additional investment properties with a total carrying amount of € 2,039 were classified as "Assets for sale".

It is noted that the properties held for sale of Alpha Leasing S.A are included in the operating segment "Corporate Banking" of note 42 "Operating segments".

Investment Properties of Alpha Investment Property Spata S.A.

Within the year 2020, Alpha Investment Property Spata S.A. classified investment properies with a carrying amount of € 11,687 in the "Assets for sale", as the conditions provided in IFRS 5 are met.

The Group measured these investment properties of the company at the lower price between their carrying amount and fair value less costs of sell. This measurement did not have any impact in the income statement.

The company's investment properties are included in the segment "Other / Elimination Centre" for operating segment disclosure purposes.

Investment Properties ABC RE COM Pafos Ltd, AGI-Cypre P&F Limassol Ltd, AGI-Cypre Property 24 Ltd, AGI-Cypre P&F Larnaca Ltd

The Group has initiated the process for the disposal of the investment properties of its subsidiary in Cyprus ABC RE COM Pafos Ltd and within 2019 it was assessed that the criteria of IFRS 5 were met. As a result, the properties were classified as "Assets held for sale" at the reporting date. The Group measured these investment properties at the lower between their carrying amount and their fair value less costs to sell, which had no impact. On 3.08.2020 the disposal of the said properties was completed resulting to a profit of € 124 that was recognized in the income statement.

During the year 2020, the Group started the procedures for the sale of investment property of the companies AGI-Cypre P&F Limassol Ltd, AGI-Cypre Property 24 Ltd, AGI-Cypre P&F Larnaca Ltd of a carrying amount of € 95, € 185 and € 111 respectively. The conditions for the application of IFRS 5 were met and the above have been classified in "Assets held for sale".

The investment properties of the companies are included in the segment "S.E. Europe" for operating segment disclosure purposes.

Fixed assets of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd

In October 2019, the subsidiaries Alpha Bank Cyprus, AGI-Cypre Ermis, Umera and subsequently Alpha Credit Aquizition Ltd, signed a long-term partnership agreement with DoValue S.p.A. in order to manage the Non-performing Exposures (NPEs) and Real Estate (REO) portfolio in Cyprus, valued at approximately € 2.1 billion (book value before impairment). The agreement also provides for the establishment of a special company for the management of Non-performing exposures in Cyprus in which the specific business of the subsidiaries will be transferred along with the assets and staff of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd employed in the specific business, in accordance with the applicable law. The business transfer has been approved by the Commission for the Protection of Competition (C.P.C.) of the Republic of Cyprus. Therefore, in accordance with IFRS 5, fixed assets amounting to € 126 were classified as "Assets held for sale" for the purposes of the preparation of the Financial Statements as at 31.12.2020, without constituting a discontinued operation as they do not form a significant part of the Group's business activities.

The fixed assets of the companies are included in the segment "S.E. Europe" for operating segment disclosure purposes.

Other assets held for sale

In the Other assets held for sale amounting to € 2,151 (31.12.2019: € 2,238) group's assets are included. In addition, in Other assets held for sale the Bank's participation in the company "Forthnet A.E." with a carrying amount of one euro is also included. On 13.11.2020 the sale of a part of the abovementioned participation was completed, for an amount of € 95 recognizing a profit of € 90 after transaction costs in "Gains less losses on financial transactions". In addition, on 08.09.2020 and on 13.11.2020 the convertible bonds of "Forthnet S.A." were sold for an amount of € 374, recognizing profit of € 364 after transaction costs in "Gains less losses on financial transactions" while on 31.12.2019 were valued at zero value.

After the transaction, the Bank holds a percentage of 0.27% on the share capital of Forthnet S.A. The sale of the remaining percentage was completed on 5.3.2021. In this category, the participations in V Telecom Investment SCA and V Telecom Investment General Partner S.A. were reclassified from the securities measured at fair value through other comprehensive income in June 2020 with a carrying value of € 478, as the Bank signed on 10.6.2020 a pre agreement for their sale, at a consideration equal to their carrying amount, which was completed on 6.10.2020 while for these shares the reserve of losses recorded directly in equity amounted to € 3,495.

The total of other assets held for sale is included in segment "S.E.Europe", with the exception of the above mentioned companies, that for operating segment disclosure purposes, are included in "Other / Elimination Center".

The Group assesses at each reporting date of the financial statements, the actions that are in place, with the purpose to classify, where the criteria of IFRS 5 are met (listed in note 1.2.17 of the Group Financial Statements), the assets and liabilities that are directly associated with them, as held for sale.

The fair value of assets classified as "Assets held for sale" at each reporting date are calculated using the methods set out in note 1.2.7 of the Group Financial Statements as at 31.12.2020 and are classified at fair value hierarchy Level 3 as reseach facts, hypotheses and data concerning assets with similar characteristics are used and so they include a wide range of non observable inputs.

49. Corporate events

- On 7.1.2020 the sale of the total shares of the Group's subsidiary, AGI – Cypre Alaminos Ltd, was completed,
- On 22.1.2020, the Group's subsidiary, Alpha Bank Cyprus Ltd established AGI – Cypre Property 45 Ltd for an amount of € 1, that was transferred on 28.2.2020 to the Bank's subsidiary, AGI – Cypre Ermis Ltd. At the same date, AGI – Cypre Ermis Ltd. proceeded to a share capital increase with contribution in kind to AGI-Cypre Property 45 Ltd for an amount of € 27,065
- On 27.1.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to a share capital increase in cash to its subsidiary, AEP GI I S.A., for an amount of € 300.
- On 29.1.2020 and on 10.08.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to the coverage of its proportion by paying an amount of € 100 and € 500 respectively, following the payment of an amount of € 650 on 18.12.2019 as an advance against the future share capital increase of the joint venture AEP Elaionas S.A.
- On 29.1.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to a share capital increase in cash to its subsidiary, AEP Irakliou S.A, for an amount of € 60.
- On 11.2.2020 the incorporation of the Bank's Branch in Luxembourg took place and on 19.6.2020 the transfer of the London Branch's activities to it was completed.
- On 11.2.2020, the Group's subsidiary, AGI-BRE Participations 4 Ltd, proceeded to a share capital increase in cash to its subsidiary, AGI-BRE Participations 4 E.O.O.D., for an amount of € 820.
- On 20.2.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd, transferred its subsidiaries AGI-Cypre Property 34 Ltd, AGI-Cypre Property 36 Ltd, AGI-Cypre Property 37 Ltd, AGI-Cypre Property 43 Ltd and AGI-Cypre Property 44 Ltd to the Group's subsidiary, Alpha Bank Cyprus Ltd.
- On 26. 2.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to a share capital increase in cash to its subsidiary, Krigeo Holdings Ltd, for an amount of € 8,500.
- On 27.2.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to an advance payment of an amount of € 6,000, against the future share capital increase in cash of its subsidiary AEP Leivadias S.A., which was completed on 8.5.2020 with the payment of the remaining capital amounting to € 4,000.
- On 3.3.2020 the Bank's subsidiary Emporiki Development & Real Estate Management A.E. was renamed to Alpha Holdings Single Member S.A.
- On 9.3.2020 the investment of the Group, Bluehouse Accession Property II, proceeded to a capital return of an amount of € 600 to the Group's subsidiary Ionian Equity Participation Ltd.
- On 11.3.2020 the Bank proceeded to the establishment and on 19.3.2020 on the payment of the share capital of the entities Reoco Orion X S.M.S.A., Reoco Galaxy II S.M.S.A. and Reoco Galaxy IV S.M.S.A, for an amount of € 50 each.
- On 13.3.2020, the Group's subsidiary, Krigeo Holdings Ltd, recovered the company AGI-BRE Participations 2 BG E.O.O.D. from the Group's subsidiary, AGI-BRE Participations 2 Ltd, for a consideration of € 0.001.
- On 13.3.2020, the Group's subsidiary, Ionian Equity Participations, proceeded to the coverage of its proportion with the 1st capital disbursement amounting to € 39 to the newly established private equity fund, SMERemedium Cap SCA Sicav-RAIF headquartered in Luxemburg. The approved commitment of the Company for its total investment in the fund amounts to € 3,000.
- On 16.3.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to an advance payment of € 75, against a future share capital increase in cash to its subsidiary, AEP Neas Erithraias S.A., which completed on 5.6.2020 with the payment of the remaining amount of € 3,425.
- On 23.3.2020 the Bank proceeded with a share capital increase in its subsidiary AGI-Cypre Ermis Ltd by paying € 65,000 in cash.
- The United Kingdom voted to leave the European Union in June 2016. The formal withdrawal process and the negotiations between the EU and the UK Government began in 2017. On January 29, 2020 the European Parliament ratified the withdrawal agreement of the UK from the EU. On December 31, 2020 the exit of the United Kingdom from European Union was completed.

- On 13.4.2020, the Group's subsidiary Krigeo Holdings Ltd, proceeded to a share capital increase in cash to its subsidiary, AGI-BRE Participations 2BG E.O.O.D., for an amount of € 8,500.
- On 7.5.2020, the Bank proceeded with a share capital increase in cash in its subsidiary Alpha Group Investments Ltd by paying an amount of € 10,000.
- On 8.5.2020, the Group's subsidiary, AIP Industrial Assets Rog S.M.S.A. was renamed to Alpha Investment Property Residential Assets S.M.S.A.
- On 9.5.2020 the Group's subsidiary, AIP Attica Commercial Assets S.M.S.A. was renamed to Alpha Investment Property Commercial Assets Urban Centers S.M.S.A.
- On 12.5.2020, the Group's subsidiary, AIP Industrial Assets Athens S.M.S.A. was renamed to AIP Industrial Assets S.M.S.A.
- On 18.5.2020, the Group's subsidiary Alpha Bank Cyprus Ltd established AGI-Cypre Property 40 Ltd for an amount of € 1.
- On 28.5.2020, the share capital increase in cash of the Bank's subsidiary, AEP Attikis S.A., for the amount of € 299 which had been paid on 30.10.2019 as an advance from its shareholder Alpha Group Investments Ltd was completed.
- On 2.6.2020 the Bank participated proportionally to the mutual funds shares increase of the joint venture Alpha TANEO A.K.E.S. by paying in cash the amount of € 102.
- On 5.6.2020 and on 29.6.2020 the Bank proceeded with the share capital increases in cash in its subsidiary Alpha Group Investments Ltd for an amount of € 3,500 and € 3,500 respectively
- On 11.6.2020, the liquidation of Cordia Residence Srl was competed with its deletion from the Romanian business registry.
- On 19.6.2020, the Bank established its subsidiary, Alpha International Holdings Single Member S.A. by paying on 15.7.2020 and 20.11.2020 an amount of € 1,280,000 and by virtue of 23.10.2020 no. ECB-SSM-2020-GRALP-16 decision of the European Central Bank.
- On 19.6.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd, proceeded to a share capital increase with contribution in kind to its subsidiary, AGI-Cypre Property 33 Ltd, paying an amount of € 514.
- On 19.6.2020, the Group's subsidiary, Alpha Bank Cyprus Ltd transferred its subsidiaries, AGI-Cypre Property 34 Ltd and AGI-Cypre Property 37 Ltd, to the Bank's subsidiary AGI-Cypre Ermis Ltd. At the same date, AGI-Cypre Ermis Ltd proceeded to a share capital increase with contribution in kind to AGI-Cypre Property 34 Ltd and AGI-Cypre Property 37 Ltd for an amount of € 606 and € 340, respectively.
- On 19.6.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd, proceeded to a share capital increase with contribution in kind to its subsidiary, AGI-Cypre P&F Pafos Ltd, paying an amount of € 579.
- On 23.6.2020, the Group's subsidiary, Alpha Bank Cyprus Ltd established the companies ABC RE RES Ammochostos Ltd and ABC RE RES Pafos Ltd, for an amount of € 1 each.
- On 24.6.2020, the Group's subsidiary, Alpha Ventures proceeded to the coverage of its proportion by paying an amount of € 13, as an advance against a future share capital increase of its investment Theta Microelectronics Inc.
- On 26.6.2020, Alpha Bank Cyprus Ltd transferred a part of its NPLs and PLs portfolio to the Group's subsidiary, Alpha Credit Acquisition Company Limited.
- On 29.6.2020, the Bank's subsidiary, Alpha Group Investments Ltd, proceeded to a share capital increase in cash to its subsidiaries, AEP Neas Kifisias S.A. and AEP Kallirois S.A., paying an amount of € 2,500 and € 1,000, respectively.
- On 29.6.2020, the Bank proceeded in a share capital increase in cash to Cepal Holdings S.A. paying an amount of € 6,000.
- On 30.6.2020, the Bank proceeded with a share capital increase in cash in its subsidiary AGI-Cypre Ermis Ltd. for an amount of € 85,000.
- On 30.6.2020, the sale of the Group's subsidiary, AGI-BRE Participations 3 E.O.O.D., was completed.
- On 3.7.2020, the Group's subsidiaries, Alpha Group Real Estate Ltd and Emporiki Venture Capital Developed Markets Ltd, established the company Sapava Ltd for an amount of € 1.
- On 6.7.2020, the Bank's subsidiary, Alpha Group Investments Ltd, paricipated in the establishment of the company Perigenis Commercial Assets A.E. and on 2.9.2020 covered its share in the founding capital of the company by paying an amount of € 15,399.

- On 8.7.2020, the Group's associate, Astakos Terminal A.E., proceeded with share capital increase by paying in cash the amount of € 236 to its subsidiary NAVIPE S.A.
- On 8.7.2020, the Bank's associate, APE Investment Property A.E., proceeded with a share capital increase to its subsidiary, SYMET S.A. by paying in cash the amount of € 78.
- On 17.7.2020, SSIF Alpha Bank Romania and Alpha Finance Romania signed an agreement for the absorption of the business activity of Alpha Finance Romania by Alpha Bank Romania, that was completed on 5.10.2020.
- On 22.7.2020, the Bank acquired the full share capital and control of Cepal Holdings S.A., following the exercise on 1.7.2020 of the put option in accordance with the changed terms of the shareholders agreement.
- On 22.7.2020, the Bank's subsidiary Cepal Holdings S.A. following its acquisition by the Bank, proceeded with a share capital increase to its subsidiary, Cepal Hellas Financial Services S.M.S.A., for an amount of € 4,700.
- On 27.7.2020, the Bank made a payment of € 485 to cover its proportion, in order to complete the share capital increase of its subsidiary APE Fixed Assets A.E. following its advance payment of € 100 on 30.10.2019.
- On 29.7.2020, the Bank's subsidiary Alpha Bank Cyprus Ltd proceeded with a share capital increase with contribution in kind to its subsidiary, ABC RE P&F Limassol Ltd, for an amount of € 354.
- On 30.7.2020, the Bank's subsidiary Alpha Bank Cyprus Ltd established AGI-Cypre Property 46 Ltd for an amount of € 1.
- On 31.7.2020, the Bank's subsidiary Alpha Bank Cyprus Ltd transferred its subsidiary AGI-Cypre Property 42 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd and on the same date the latter proceeded to a share capital increase with contribution in kind for an amount of € 458.
- On 31.7.2020, the Bank's subsidiary AGI-Cypre Ermis Ltd proceeded to a share capital increase with contribution in kind to its subsidiary, AGI-Cypre P&F Nicosia Ltd, for an amount of € 528.
- On 5.8.2020, the disposal of the total shares of the Group's subsidiary ABC-RE L1 Ltd was completed.
- On 31.8.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd, proceeded with a share capital increase with contribution in kind to its subsidiary, AGI-Cypre Property 10 Ltd, for an amount of € 890.
- On 2.9.2020, the Bank proceeded to a share capital increase in cash to its subsidiary Alpha Group Investments Ltd by paying an amount of € 15,399.
- On 10.9.2020, the Bank participated proportionally to the mutual funds shares increase of the joint venture Alpha TANEO A.K.E.S. by paying in cash the amount of € 408.
- On 18.9.2020 the Bank's subsidiary, Alpha Bank Cyprus Ltd transferred its subsidiaries, AGI-Cypre Property 36 Ltd and AGI-Cypre Property 44 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd. Subsequently, on the same date, the latter proceeded with a share capital increase with contribution in kind to AGI-Cypre Property 36 Ltd, AGI-Cypre Property 44 Ltd and AGI-Cypre P&F Pafos Ltd, for an amount of € 550, € 1,328 and € 162 respectively.
- On 24.9.2020, the Group's participation, Visa Inc., through Class C preferred shares, released a value of $ 4,216,411 to its Class C shareholders by issuing Class A preferred shares and adjusting the conversion ratio of existing Class C preferred shares to common Class A shares traded on the NYSE. As a result, the Group acquired an additional participation in the company through Class A preferred shares, valued to € 21,374 (24.9.2020). At the same time, the value of the existing Class C preferred shares held by the Group was adjusted from € 42,129 (31.8.2020) to € 19,920 (24.9.2020).
- On 29.9.2020 the Bank's subsidiary, Alpha Bank Cyprus Ltd transferred its subsidiary, AGI-Cypre Property 43 Ltd, to the Bank's subsidiary AGI-Cypre Ermis Ltd. Subsequently, on the same date, the latter proceeded to a share capital increase with contribution in kind to AGI-Cypre Property 43 Ltd, for an amount of € 550.
- On 30.9.2020, the Group's subsidiary, AGI-RRE Cleopatra Srl proceeded to a share capital increase in cash to its subsidiary, TH Top Hotels Srl for the amount of € 162.
- On 6.10.2020, the sale of the Bank's participations in V Telecom Investment S.C.A and V Telecom Investment General Partner S.A. based in Luxemburg was completed.
- On 21.10.2020, the Bank's subsidiary, Alpha Bank Cyprus Ltd established AGI-Cypre Property 47 Ltd and AGI-Cypre Property 48 Ltd for an amount of € 1 each.

- On 26.10.2020, the Group's subsidiary, Alpha Bank Cyprus Ltd, transferred its subsidiary, AGI-Cypre Property 40 Ltd, to the Bank's subsidiary, AGI-Cypre Ermis Ltd.
- On 29.10.2020, the Bank's subsidiary Alpha Credit Acquisition Company Ltd established Alpha Credit Property 1 Ltd for an amount of € 1.
- On 6.11.2020, the sale of the total shares of the Group's subsidiary, AGI-Cypre Property 3 Ltd, was completed.
- On 11.11.2020, the sale of the Bank's participation in Mastercard Incorporated was completed.
- On 13.11.2020 the partial sale of Bank's participation to Forthnet S.A., which corresponds to 5,30% of the company's share capital, was completed. Following the transaction's completion, the Bank currently holds 0,27% of the share capital of Forthnet S.A.
- On 18.11.2020, the Group's subsidiary, Alpha Group Real Estate Ltd, established the company Office Park I Srl, for an amount of € 0,04.
- On 27.11.2020, the Bank proceeded with a share capital increase in cash to its subsidiary Cepal Holdings S.A. by paying an amount of € 147,000. At the same date, Cepal Holdings S.A. proceeded with a share capital increase to its subisidiary Cepal Hellas Financial Services S.M.S.A., amounting to € 149,000.
- On 2.12.2020, the Bank proceeded with a share capital increase in cash to its subsidiary Alpha Group Investments Ltd by paying an amount of € 75,500. At the same date, Alpha Group Investments Ltd, proceeded to a share capital increase in cash to its subsidiary, Alpha Group Real Estate Ltd, for an amount of € 75,504.
- On 4.12.2020, the Group's subsidiary, Alpha Group Real Estate Ltd, proceeded to a share capital increase in cash to its subsidiary, Sapava Ltd, for an amount of € 75,504.
- On 7.12.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd, established the companies AGI-Cypre COM Larnaca Ltd and AGI-Cypre COM Nicosia Ltd, for an amount of € 1 each.
- On 8.12.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd, established the companies AGI-Cypre Property 49 Ltd and AGI-Cypre Property 50 Ltd, for an amount of € 1 each.
- On 11.12.2020, the liquidation of Beroe Real Estate EOOD was completed with its deletion from the Bulgarian business registry.
- On 14.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and by virtue of 23.10.2020 no. ECB-SSM-2020-GRALP-16 decision of the European Central Bank, the Bank proceeded with a share capital increase in cash to its subsidiary, Alpha Holdings Single Member S.A. by paying an amount of € 197,304.
- On 15.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 375/3 / 27.11.2020 approval decision of Bank of Greece, the transfer of all shares of Alpha Leasing, owned entirely by the Bank, to Alpha Holdings Single Member S.A. was completed.
- On 15.12.2020, the Group's subsidiary, Sapava Ltd, acquired the total shares of Acarta Construct Srl, for an amount of € 0,2 and on 30.12.2020 Sapava Ltd proceeded to a share capital increase in cash to the company paying an amount of € 75,500.
- On 16.12.2020, the Group's subsidiary, Alpha Bank Cyprus Ltd, transferred its subsidiary, AGI-Cypre Property 46 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd.
- On 21.12.2020 in the context of the reorganization plan of the Bank's subsidiaries, Alpha Real Estate and Investment Management (AREM-I) proceeded with a share capital increase in cash in Alpha Holdings Single Member S.A. by paying an amount of € 230.000. As a result in the share capital of Alpha Holdings Single Member S.A. the Bank participates with a percentage of 51% and AREM-I with a percentage of 49%.
- On 21.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 375/4 / 27.11.2020 approval decision of the Bank of Greece, the transfer of all shares of ABC Factors, owned entirely by the Bank, to Alpha Holdings Single Member S.A. was completed.
- On 21.12.2020, in the context of the reorganization plan of the Bank's subsidiaries, the transfer of all shares of Emporiki Venture Capital Emerging Markets Ltd, owned entirely by the Bank, to Alpha Group Investments Ltd. was completed.
- On 21.12.2020, in the context of the reorganization plan of the Bank's subsidiaries, the transfer of the shares of AEP Attiki S.A., held by the Bank, to the other shareholder of the company, Alpha Group Investments Ltd., was completed.

- On 23.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 1/1708 / 22.12.2020 approval decision of the Hellenic Capital Market Commission, the transfer of all shares of Alpha Finance A.E.P.E.Y., held by the Bank and Alpha Real Estate and Investment Management (AREM-I), to Alpha Holdings Single Member S.A. was completed.
- On 23.12.2020 the Bank participated proportionally to the mutual funds shares increase of the joint venture Alpha TANEO A.K.E.S. by paying in cash the amount of € 49.
- On 24.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 6/1684 / 15.9.2020 and 2/1708 / 22.12.2020 approval decisions of the Hellenic Capital Market Commission, the transfer of all shares of Alpha Asset Management A.E.D.A.K., held by the Bank and Alpha Real Estate and Investment Management (AREM-I), to Alpha Holdings Single Member S.A. was completed.
- On 24.12.2020 the sale of the total shares of Group's subsidiary AEP GI I S.A. was completed.
- On 28.12.2020, in the context of the reorganization plan of the Bank's subsidiaries and by virtue of the approval decision of the Central Bank of Cyprus dated 24.12.2020, the transfer of all shares of Alpha Credit Acquisition Company ltd to Alpha International Holdings Single Member S.A. was completed.
- On 28.12.2020, the liquidation of the Bank's subsidiary, METEK S.A., was completed.
- On 30.12.2020, in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. ECB-SSM-2020-GRALP-15-QLF-2020-091 joint decision of the European Central Bank and the Central Bank of Cyprus, the transfer of all shares of Alpha Bank Cyprus Ltd to Alpha International Holdings Single Member S.A. was completed. On the same date, all convertible bonds, issued by Alpha Bank Cyprus Ltd and held by the Bank, were transferred to Alpha International Holdings Single Member S.A.
- On 30.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. Nr. FG / 613 / 02.11.2020 of the decision of the Central Bank of Romania, the transfer of the shares of Alpha Bank Romania S.A., held by the Bank, to Alpha International Holdings Single Member S.A. was completed.
- On 30.12.2020, the Bank participated in a share capital increase of the company Ionian Hotel and Enterprises by paying an amount of € 5,200, resulting in a participation through preferred shares that correspond to 7% of the company's share capital.
- On 30.12.2020, Group's subsidiary, Alpha Bank Cyprus Ltd, transferred its subsidiaries AGI-Cypre Property 47 Ltd and AGI-Cypre Property 48 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd. At the same date, AGI-Cypre Ermis Ltd, proceeded to a share capital increase with contribution in kind to AGI-Cypre Property 47 Ltd, for an amount of € 1,085.
- On 31.12.2020, the Bank's subsidiary, AGI-Cypre Ermis Ltd proceeded to a share capital increase to its subsidiary AGI-Cypre Res Pafos Ltd, for an amount of € 531.
- On 31.12.2020, the conversion of the bonds, at the date of expiry, of the Companies Zero Energy Buildings S.A. energy services to its subsidiaries and of the Group Alpha Ventures and Ionian Equity Participations was completed, for an amount of € 642 and € 2 respectively, including the accrued interest resulting to the acquisition of participation for a percentage of 48,83% and 0,17% respectively, to the share capital of the Company.
- On 25.1.2021, in the context of the reorganization plan of Bank's subsidiaries and in virtue to decision No. 3/ 13.1.2021 of the Central Bank of Albania and decision of Albania Competition Authority of 30.7.2020, the transfer of the shares of Alpha Bank Albania SH.A, totally owned by the Bank, to Alpha International Holdings Single Member S.A. was completed.
- On 31.1.2021 the disposal of the total shares of the Group's subsidiary, AGI-Cypre Property 10 Ltd was completed.
- On 12.2.2021 the disposal of the total shares of the Bank's subsidiary, Alpha Investment Property Attikis II S.A., was completed.
- On 15.2.2021 the Bank's subsidiary, AGI-Cypre Ermis Ltd established AGI-Cypre Property 52 Ltd and AGI-Cypre Property 53 Ltd for an amount of € 1 each.
- On 15.2.2021 the disposal of the total shares of the Group's subsidiary, AGI-Cypre Property 36 Ltd, was completed.
- On 19.2.2021 a portfolio of both performing and non-performing loans was transferred (accounting wise) from AGI-Cypre Ermis Ltd and Umera Limited to the Group's subsidiary Alpha Credit Acquisition Company Limited.
- On 23.2.2021 the Group's subsidiary, AGI-Cypre Ermis Ltd established AGI-Cypre Property 51 Ltd for an amount of € 1.

- On 26.2.2021 the disposal of the total shares of the Group's subsidiary, ABC RE P1 Ltd, was completed.
- On 5.3.2021 the disposal of the remaining shares of Forthnet held by the Bank, following the partial sale of Bank's participation on 13.11.2020, was completed through the acceptance of a public offer addressed to the company's shareholders.
- On 12.3.2021 the Bank proceeded with share capital increase in cash to its subsidiary, Alpha Group Investments Ltd, by paying an amount of € 265,000. Subsequently, on the same date, the latter proceeded with share capital increase in cash to its subsidiary, Umera Limited, by paying an amount of € 265,000.
- On 12.3.2021 the Bank's subsidiary, Alpha International Holdings Single Member S.A., proceeded with share capital increase in cash to its subsidiary, Alpha Credit Acquisition Company Limited, by paying an amount of € 520,000.
- On 17.3.2021 the sale of all the shares of the Group's subsidiary, AGI-RRE Cleopatra Srl was completed.

50. Restatement of financial statements

Within 2020, the Group has amended the presentation of the loss resulting from sale of fixed assets. In particular, these amounts, that were hitherto been included in "General administrative expenses" category of the Income Statement, are now presented in "Other Expenses" category. This change aims to reflect more accurately the nature of its results, taking into account that the sale of fixed assets is an ancillary and not a core activity, while at the same time it is consistent with the presentation of impairment losses of fixed assets, which are also included in "Other Expenses".

In addition, within the first half of the year, the Bank modified the presentation of the income statement accounts for operating risk. In particular, these items that were included in "General administrative expenses" category of the Income Statement, are now presented in "Other expenses" category. This change is intended to provide a more accurate picture of the nature of its results, taking into account that the corresponding provisions for operating risk events are recorded in "Other Expenses".

Moreover, within the fourth quarter of 2020 the Group restated, in order to appropriately present its results of operations, the negative interest presentation reclassifying negative interest from interest bearing assets from "Interest and similar income" to "Interest expense and related charges" in the Income Statement. Similarly the presentation of negative interest from interest bearing liabilities was reclassified from "Interest and related expenses" to "Interest and related income" of the Income Statement.

As a result of the above changes, particular captions of the consolidated Statement of Comprehensive Income were restated without changing the results of each period.

Furthermore, the Group retrospectively restated the preferred Class C shares held in Visa International from the category of securities valued at fair value through other comprehensive income to the category of securities valued at fair value through profit or loss. In particular, the classification of these shares was revised as the definition of "equity instrument" under IAS32 is not met and therefore there is no option to classify them in the portfolio of securities measured at fair value through other comprehensive income. Consequently, these shares were reclassified retrospectively from the date of first application of IFRS 9 to fair value through profit or loss category of the investment portfolio as "Other variable yield securities".

As a result of the above changes, Income Statement, Statement of Comprehensive Income and Balance Sheet of the previous year were restated, as shown in the following tables:

The restated Income Statement from 1.1 to 31.12.2019 is presented below:

	From 1 January to 2019		
	Published amounts	Restatement	Restated amounts
Interest and similar income	2,022,356	86,679	2,109,035
Interest expense and similar charges	(475,088)	(86,679)	(561,767)
Net interest income	1,547,268		1,547,268
Fee and commission income	432,022		432,022
Commission expense	(91,893)		(91,893)
Net fee and commission income	340,129		340,129
Dividend income	1,072		1,072
Gain less losses on derecognition of financial assets measured at amortized cost	(16,054)		(16,054)
Gains less losses on financial transactions	414,580	11,072	425,652
Other income	35,851		35,851
Total other income	435,449	11,072	446,521
Total income	**2,322,846**	**11,072**	**2,333,918**
Staff costs	(459,938)		(459,938)
Expenses for separation schemes	(49,615)		(49,615)
General administrative expenses	(483,204)	8,559	(474,645)
Depreciation and amortization	(144,532)		(144,532)
Other expenses	(37,387)	(8,559)	(45,946)
Total expenses before impairment losses and provisions to cover credit risk	**(1,174,676)**		**(1,174,675)**
Impairment losses and provisions to cover credit risk	(990,415)		(990,415)
Share of profit/(loss) of associates and joint ventures	(12,603)		(12,603)
Profit/(loss) before income tax	**145,152**	**11,073**	**156,225**
Income tax	(48,027)	(2,787)	(50,814)
Profit/(loss) for the year	**97,125**	**8,286**	**105,411**
Earnings/(losses) per share:			
Basic and diluted (€ per share)	0,0682		0,0682

The restated statement of comprehensive income for the year from 1 January to 31.12.2019, is presented below:

	From 1 January to 31.12.2019		
	Published amounts	Restatement	Restated amounts
Profit/(loss) for the yearrecognized in the Income Statement	**97,125**	**8,286**	**105,411**
Other comprehensive income			
Items that may be reclassified to the Income Statement			
Net change in investment securities' reserve measured at fair value through other comprehensive income	523,929		523,929
Net change in cash flow hedge reserve	(130,463)		(130,463)
Foreign currency translation net of investment hedges of foreign operations	(1,486)		(1,486)
Income tax	(114,779)		(114,779)
Items that may be reclassified to the Income Statement	**277,201**		**277,201**
Items that will not be reclassified to the Income Statement			
Net change in actuarial gains/(losses) of defined benefit obligations	(11,325)		(11,325)
Gains/(losses) from equity securities measured at fair value through other comprehensive income	(9,282)	(11,072)	(20,354)
Income tax	6,650	2,787	9,437
Items that will not be reclassified to the Income Statement	**(13,957)**	**(8,286)**	**(22,243)**
Other comprehensive income for the year, after income tax	263,244	(8,286)	254,958
Total comprehensive income for the year	**360,369**	**(8,286)**	**360,369**

349 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The restated balance sheet as of 1.1.2019 and 31.12.2019, is presented below:

	1.1.2019		
	Published amounts	**Restatement**	**Restated amounts**
Investment securities			
- measured at fair value through other comprehensive income	6,961,822	(26,480)	6,935,342
- measured at fair value through profit or loss	42,794	26,480	69,274
Total Impact on Total Assets	**7,004,616**	**-**	**7,004,616**

	31.12.2019		
	Published amounts	**Restatement**	**Restated amounts**
Investment securities			
- measured at fair value through other comprehensive income	7,557,499	(37,569)	7,519,930
- measured at fair value through profit or loss	55,541	37,569	93,110
Total Impact on Total Assets	**7,613,040**	**-**	**7,613,040**

Finally, regarding the reclassification of the Bank's participation in APE Commercial Property joint venture, as mentioned in detail in note 48 «Assets held for sale», the Group assessed the impact on its consolidated financial position as non significant in terms of the total assets of the Consolidated Balance Sheet, while there was no impact on the consolidated results and Equity at the beginning of the comparative year, given that the participation was valued at the lower of recoverable and carrying amount. Therefore, there was no retrospective restatement of the comparative periods.

In case of retrospective restatement, the impact on the Balance Sheet of 1.1.2019 and 31.12.2019 would have been the following:

	31.12.2019	**1.1.2019**
Investments in associates and joint ventures	3,917	3,917
Assets held for sale	(3,917)	(3,917)
Total Impact on Total Assets	**-**	**-**

Rescpectively, the impact on the consolidated Income Statement for the quarters of 2019 would be as follows:

	From 1 January to			
	31.12.2019	**30.9.2019**	**30.6.2019**	**31.3.2019**
Gains less losses on financial transactions	17	7	5	3
Share of profit/(loss) of associates and joint ventures	(17)	(7)	(5)	(3)
Total impact on results	**-**	**-**	**-**	**-**

	1.10 - 31.12.2019	**1.7 - 30.9.2019**	**1.4 - 30.6.2019**	**1.1 - 31.3.2019**
Gains less losses on financial transactions	10	2	2	3
Share of profit/(loss) of associates and joint ventures	(10)	(2)	(2)	(3)
Total Impact on results	**-**	**-**	**-**	**-**

350 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

51. Strategic Plan 2020 – 2022

In November 2019, the Bank announced the framework of the strategic plan 2020-2022, which has as its main priority the acceleration of the clean up of its balance sheet. Detailed references regarding the strategic plan included on the Annual Bord of Director's Report of 31.12.2020. The strategic framework includes: (a) the transaction of a securitization of non-performing loans, amounting to € 11 billion (Galaxy transaction), (b) the inclusion of the Securitization Transaction in the "Hercules" asset protection scheme of Law 4649/2019 for the limitation of the impact of the Securitization Transaction on the capital adequacy of the Bank and the subsequent sale of the portfolio, (c) the transfer of the management of non-performing exposures to the company "Cepal", a licensed loan management company under Law 4354/2015 and the subsequent sale of the shares of "Cepal" to a third party investor and (d) the hive-down of the Bank's banking activities.

- The Bank completed the securitization transaction of non-performing loans, as it is mentioned in note 19, and on 6.8.2020 announced the submission of an application for the inclusion under Law 4649/2019 of the Orion and Galaxy II securitizations of the Galaxy transaction, in the"Hercules" asset pretection scheme. The application concerns the provision of a guarantee by the Greek State for the senior notes with a total value of up to € 3.04 billion. In the same context, on 22.10.2020, it submitted an application for the third Galaxy IV securitization. The application concerns the provision of a guarantee by the Greek State for the senior notes of the Galaxy IV securitization with a total value of up to € 650 million.
- The Bank, after the approval of the Board of Directors on 26.11.2020, signed a private business transfer agreement with Cepal Hellas Financial Services Single Member S.A. for the carve-out of the Bank's Non-Performing Loans Unit for retail and wholesale Banking. The fair value of the transfered business amounted to € 240 million. The transfer of the Non-performing Exposure management activity was completed on 1.12.2020, and from this date Cepal Hellas Financial Services Single Member S.A. took over the management of past due or non-performing debts to the Bank, both current and future, as it is mentioned in detail in note 32.

  In this context, on 22 February 2021, a binding agreement was entered into with an Investor that includes:

  - The sale of 80% of its loan servicing subsidiary, Cepal Holdings S.A. More specifically, the Bank will sell 80% of the share capital of Cepal, while maintaining the remaining 20% and all the usual management rights according to the amount of its participation.
  - The sale of 51% of the mezzanine and junior securitization notes of the Non-performing Exposure portfolio amounting to € 10.8 billion. It is noted that the Bank will maintain 5% of the mezzanine and junior securitization notes, according to the regulatory framework of risk retention and intends to distribute 44% of the remaining notes to the shareholders.
- Finally, the Board of Directors decided on 1.6.2020 the initiation of Alpha Bank's demerger by way of hive-down of the banking business sector and the incorporation of a new entity (hereinafter the "New Bank") in accordance with Article 16 of Law 2515/1997 and par. 3 of Article 57 of Law 4601/2019 and article 59 to 74 of Law 4601/2019.

  Pursuant to the Hive-Down, the banking business of Alpha Bank will be transferred to the New Bank, which will be licensed as a credit institution and shall be an 100% subsidiary of Alpha Bank. Alpha Bank will retain certain assets and liabilities, and pursue non-core banking activities but, upon the completion of the Hive-Down, will cease to be a credit institution, while its shares will remain listed on Main Market of the Athens Stock Exchange.

  Moreover, in accordance with the same resolution, the 30 June 2020 has been set as the Transformation Balance Sheet date of the Hive-Down. All actions to be taken by Alpha Bank after the Transformation Balance Sheet date, which are relevant to the banking business, are deemed to be taken for the benefit of the New Company. However, it is noted that the demerger will be accounted for following the completion of the Hive-Down.

  The rights of the Hellenic Financial Stability Fund will be retained and preserved in full after the completion of the Hive-Down.

  The completion of the Hive-Down is subject to the approvals of Alpha Bank's Board of Directors and General Meeting of Shareholders, as well as to all necessary approvals by the competent Authorities pursuant to applicable law.

  The draft demerger deed by way of hive-down with the incorporation of a new company was approved at the meeting of the Board of Directors on 15.9.2020.

52. Events after the balance sheet date

- From 10.1.2021, the Bank is fully integrated in the new infrastructure 24/7/365 of the interbank European payment system SEPA, having successfully completed the necessary technical tests, in collaboration with the interbank payments, DIAS S.A. Alpha Bank is the first to implement in all channels and with absolute security, the innovative service of direct payments for transactions within the Greek Territory.
- On 4.3.2021, the Bank completed the issuance of a Tier 2 bond, of nominal value of Euro 500 million. This subordinated debt has a maturity of 10.25 years with call option between 5 and 5.25 years, at a yield of 5,5%. The bond is traded in the stock exchange of Luxembourg – EuroMTF Market.
- On 12.3.2021, the Board of Directors of the Bank decided to convene the Extraordinary General Meeting on 2.4.2021, regarding the approval of the demerger of the Alpha Bank S.A. by way of hive-down of the banking business sector with the incorporation of a new company and the 15.9.2020 Demerger Deed, including the Transformation Balance Sheet from 30.6.2020.

Athens, 23 March 2021

THE CHAIRMAN OF THE BOARD OF DIRECTORS	THE CHIEF EXECUTIVE OFFICER	THE GENERAL MANAGER AND CHIEF FINANCIAL OFFICER	THE ACCOUNTING AND TAX MANAGER
VASILEIOS T. RAPANOS ID No AI 666242	VASSILIOS E. PSALTIS ID No AI 666591	LAZAROS A. PAPAGARYFALLOU ID No AK 093634	MARIANA D. ANTONIOU ID No X 694507

352 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Bank Financial Statements as at 31.12.2020

ALPHA BANK

Income Statement

(Amounts in thousands of Euro)

		From 1 January to	
	Note	**31.12.2020**	**31.12.2019***
Interest and similar income		1,806,416	1,825,251
Interest expense and similar charges		(501,044)	(528,761)
Net interest income	2	1,305,372	1,296,490
Fee and commission income	3	325,358	369,809
Commission expense		(44,484)	(80,888)
Net fee and commission income	3	280,874	288,921
Dividend income	4	10,726	23,760
Gains less losses on derecognition of financial assets measured at amortised cost	6	178,205	(16,421)
Gains less losses on financial transactions	5	410,718	322,556
Other income	7	18,819	16,813
Total other income		618,468	346,708
Total income		**2,204,714**	**1,932,119**
Staff costs	8	(334,317)	(346,199)
Expenses for separation schemes	8	-	(49,615)
General administrative expenses	9	(369,272)	(378,298)
Depreciation and amortization	22, 23, 24	(128,902)	(109,419)
Other expenses	10	(15,983)	(33,007)
Total expenses before impairment losses and provisions to cover credit risk		**(848,474)**	**(916,538)**
Impairment losses and provisions to cover credit risk	11, 12	(1,142,715)	(924,799)
Profit/(loss) before income tax		**213,525**	**90,782**
Income tax	13	(75,128)	(29,851)
Profit/(loss) for the year		**138,397**	**60,931**
Earnings/(losses) per share			
Basic (€ per share)	14	0.0897	0.0395
Diluted (€ per share)	14	0.0897	0.0395

* Certain figures of the previous year have been restated as described in note 47.

The attached notes (pages 360-576) form an integral part of the Bank's financial statements

Statement of Comprehensive Income

(Amounts in thousands of Euro)

	Note	From 1 January to 31.12.2020	31.12.2019*
Profit/(loss) for the year, recognized in the Income Statement		**138,397**	**60,931**
Other comprehensive income			
Items that may be reclassified subsequently to the Income Statement			
Net change in reserve of investment securities measured at fair value through other comprehensive income		(363,393)	475,994
Net change in cash flow hedge reserve		20,841	(130,454)
Income tax	13	99,340	(100,206)
Items that may be reclassified to the Income Statement		**(243,212)**	**245,334**
Items that will not be reclassified to the Income Statement			
Premeasurement of defined benefit liability/ (asset)	31	(3,242)	(10,931)
Gains/(losses) from investments in equity securities measured at fair value through other comprehensive income		4,064	(20,121)
Income tax	13	(239)	9,005
Items that will not be reclassified to the Income Statement	13	**583**	**(22,047)**
Other comprehensive income, after income tax		(242,629)	223,287
Total comprehensive income for the year		**(104,232)**	**284,218**

* Certain figures of the previous year have been restated as described in note 47.

The attached notes (pages 360-576) form an integral part of the Bank's financial statements

Balance Sheet

(Amounts in thousands of Euro)

	Note	31.12.2020	31.12.2019*
ASSETS			
Cash and balances with central banks	15	6,682,232	1,201,807
Due from banks	16	2,630,190	3,332,938
Trading securities	17	29,418	18,647
Derivative financial assets	18	1,272,924	1,024,484
Loans and advances to customers	19	35,280,807	34,854,802
Investment securities			
- Measured at fair value through other comprehensive income	20	5,170,579	6,194,015
- Measured at fair value through profit or loss	20	218,317	217,512
- Measured at amortised cost	20	3,160,121	1,070,730
Investments in subsidiaries, associates and joint ventures	21	2,488,619	919,757
Investment property	22	46,659	39,679
Property, plant and equipment	23	642,381	697,459
Goodwill and other intangible assets	24	473,458	448,165
Deferred tax assets	25	5,277,158	5,233,082
Other assets	26	1,373,114	1,356,278
		64,745,977	**56,609,355**
Assets classified as held for sale	44	274,773	1,371,837
Total Assets		**65,020,750**	**57,981,192**
LIABILITIES			
Due to banks	27	13,333,799	10,754,495
Derivative financial liabilities	18	1,769,222	1,447,703
Due to customers	28	39,535,086	35,541,466
Debt securities in issue and other borrowed funds	29	1,048,536	882,566
Liabilities for current income tax and other taxes	30	64,296	24,887
Employee defined benefit obligations	31	84,899	87,395
Other liabilities	32	990,529	934,559
Provisions	33	189,499	200,746
Total Liabilities		**57,015,866**	**49,873,817**
EQUITY			
Share capital	34	463,110	463,110
Share premium	35	10,801,029	10,801,029
Reserves	36	326,893	568,438
Retained earnings		(3,586,148)	(3,725,202)
Total Equity		**8,004,884**	**8,107,375**
Total Liabilities and Equity		**65,020,750**	**57,981,192**

* Certain figures of the previous year have been restated as described in note 47.

The attached notes (pages 360-576) form an integral part of the Bank's financial statements

Statement of Changes in Equity

(Amounts in thousands of Euro)

	Note	Share capital	Share premium	Reserves	Retained earnings*	Total
Balance 31.12.2018		**463,110**	**10,801,029**	**323,104**	**(3,736,156)**	**7,851,087**
Impact of initial application of IFRS 16					(27,930)	(27,930)
Balance 1.1.2019		**463,110**	**10,801,029**	**323,104**	**(3,764,086)**	**7,823,157**
Changes for the year 1.1 - 31.12.2019						
Profit/(loss) for the year, after income tax					60,931	60,931
Other comprehensive income for the year, after income tax				245,334	(22,047)	223,287
Total comprehensive income for the year		**-**	**-**	**245,334**	**38,884**	**284,218**
Balance 31.12.2019		**463,110**	**10,801,029**	**568,438**	**(3,725,202)**	**8,107,375**

(Amounts in thousands of Euro)

	Note	Share capital	Share premium	Reserves	Retained earnings	Total
Balance 1.1.2020		**463,110**	**10,801,029**	**568,438**	**(3,725,202)**	**8,107,375**
Changes for the year 1.1 - 31.12.2020						
Profit/(loss) for the year, after income tax					138,397	138,397
Other comprehensive income for the year, after income tax				(243,212)	583	(242,629)
Total comprehensive income for the year		**-**	**-**	**(243,212)**	**138,980**	**(104,232)**
Employee stock option reserve	8			1,667		1,667
Share capital increase expenses					74	74
Balance 31.12.2020		**463,110**	**10,801,029**	**326,893**	**(3,586,148)**	**8,004,884**

* Certain figures of the previous year have been restated as described in note 47.

The attached notes (pages 360-576) form an integral part of the Bank's financial statements

Statement of Cash Flows

(Amounts in thousands of Euro)

	Note	From 1 January to 31.12.2020	31.12.2019*
Cash flows from operating activities			
Profit / (Loss) before income tax		213,525	90,782
Adjustments of profit / (loss) before income tax for:			
Depreciation, impairment, write-offs of property, plant and equipment		64,253	61,692
Amortization, impairment, write-offs of intangible assets		66,298	54,778
Impairment losses on financial assets and other provisions		1,124,416	1,029,846
Gains less losses on derecognition of financial assets measured at amortised cost		(178,205)	16,421
Fair value (gains)/losses on financial assets measured at fair value through profit or loss		82,895	(21,564)
Impairment of investments		180,872	86,973
Net (gain)/loss from investing activities		(732,568)	(499,656)
Net (gain)/loss from financing activities		46,036	35,667
		867,522	854,939
Net (increase)/decrease in assets relating to operating activities:			
Due from banks		(250,064)	349,522
Trading securities and derivative financial instruments		(18,928)	(103,678)
Loans and advances to customers		(1,318,315)	(613,088)
Other assets		167,220	(99,381)
Net increase/(decrease) in liabilities relating to operating activities:			
Due to banks		2,579,305	65,082
Due to customers		3,993,804	2,049,247
Other liabilities		(160,275)	(123,302)
Net cash flows from operating activities before income tax		**5,860,269**	**2,379,341**
Income tax paid			
Net cash flows from operating activities		**5,860,269**	**2,379,341**
Cash flows from investing activities			
Investments in subsidiaries, associates and joint ventures		(1,925,361)	(109,007)
Proceeds from disposals of subsidiaries, associates and joint ventures		1,020,046	62,108
Proceeds from the carve out of the Non Performing Exposures Unit		240,000	
Dividends received		10,726	23,760
Acquisitions of investment property, property, plant and equipment and intangible assets	22, 23, 24	(134,149)	(147,677)
Disposals of investment property, property, plant and equipment and intangible assets		2,749	24,364
Interest received from investment securities		164,085	128,577
Purchases of Greek Government Treasury Bills		(1,140,765)	(469,700)
Proceeds from disposal and redemption of Greek Government Treasury Bills		616,629	1,063,418
Purchases of investment securities (excluding Greek Government Treasury Bills)		(5,779,451)	(5,404,623)
Disposals/maturities of investment securities (excluding Greek Government Treasury Bills)		5,498,736	3,979,802
Net cash flows from investing activities		**(1,426,755)**	**(848,978)**
Cash flows from financing activities			
Issuance of debt securities in issue and other borrowed funds		559,410	218,849
Interest paid on debt securities in issue and other borrowed funds		(16,141)	(11,970)
Repayments of debt securities in issue and other borrowed funds		(419,617)	(170,332)
Finance lease payments		(30,340)	(31,168)
Net cash flows from financing activities		**93,312**	**5,379**
Effect of foreign exchange changes on cash and cash equivalents		119	1,733
Net increase/(decrease) in cash flows		**4,526,945**	**1,537,475**
Cash and cash equivalents at the beginning of the year	15	**2,540,198**	**1,002,723**
Cash and cash equivalents at the end of the year	15	**7,067,143**	**2,540,198**

* Certain figures of the previous year have been restated as described in note 47.

The attached notes (pages 360-576) form an integral part of the Bank's financial statements

Notes to the Financial Statements

GENERAL INFORMATION

The Bank operates under the brand name of Alpha Bank S.A. using the sign of Alpha Bank. The Bank's registered office is 40 Stadiou Street, Athens and is listed in the General Commercial Register with registration number 223701000 (ex societe anonyme registration number 6066/06/B/86/05). The Bank's duration is until 2100 but may be extended by the General Meeting of Shareholders.

In accordance with article 4 of the Articles of Incorporation, the Bank's objective is to engage, on its own account or on behalf of third parties, in Greece and abroad, independently or collectively, including joint ventures with third parties, in any and all (main and secondary) operations, activities, transactions and services allowed to credit institutions, in conformity with whatever rules and regulations (domestic, community, foreign) may be in force each time. In order to serve this objective, the Bank may perform any kind of action, operation or transaction which, directly or indirectly, is pertinent, complementary or auxiliary to the purposes mentioned above.

The Bank is managed by the Board of Directors, which represents the Bank and has the authority to take actions relating to the Bank's management, the management of its assets and the pursuit of its purpose. The tenure of the Board of Directors which was elected by the Ordinary General Meeting of Shareholders on 29.6.2018 expires with the Ordinary General Meeting of Shareholders that will take place in 2022.

The Board of Directors as at December 31, 2020, consisted of:

CHAIRMAN (Non Executive Member)

Vasileios T. Rapanos

EXECUTIVE MEMBERS

Vassilios E. Psaltis, Chief Executive Officer (CEO)
Spyros N.Filaretos, General Manager - Growth and Innovation Officer

NON-EXECUTIVE MEMBER

Efthimios O. Vidalis */****
Artemios Ch.Theodoridis

NON-EXECUTIVE INDEPENDENT MEMBERS

Dimitris K. Tsitsiragkos**/***
Jean L. Cheval **/***
Carolyn Adele G. Dittmeier */****
Richard R. Gildea **/***
Elanor R.Hardwick */****
Shahzad A. Shahbaz ****
Jan Oscar A. Vanhevel */***

NON-EXECUTIVE MEMBER
(in accordance with the requirements of Law 3864/2010)

Johannes Herman Frederik G. Umbgrove */**/***/****

SECRETARY

George P. Triantafyllides

The Board of Directors may set up the Executive Committee in order to delegate certain powers and responsibilities. The Executive Committee (the "Committee") acts as the collective corporate body of the Bank. The powers and responsibilities of the Committee are set out in an Act of the Chief Executive Officer, which delegates powers and responsibilities to the Committee. Indicatively, the Committee's main responsibilities include, but are not limited to, the involvement in the preparation of the strategy, business plan and annual budget of the Bank and the Group in order to be submitted to the

* Member of the Audit Committee
** Member of the Remuneration Committee
*** Member of the Risk Management Committee
**** Member of Corporate Governance and Nominations Committee

Board of Directors for approval, as well as the preparation of the annual and interim financial statements, management of the funding allocation to the Business Units including decision making, the preparation of the Reports for the Internal Capital Adequacy Assessment Process (ICAAP) and the Internal Liquidity Adequacy Assessment Process (ILAAP), the review and approval of the Bank's policies, approval and management of any employee schemes proposed by the Human Resources Department and ensuring the effectiveness of corporate governance, processes and systems related to Recovery Plan. Furthermore, the Committee is responsible for the implementation of the overall risk strategy – including risk appetite and the Bank's risk management framework- of a robust and effective corporate governance and internal control framework, for the selection process and for the evaluation of the key management personnel, for the distribution of both internal and regulatory funds, as well as for the determination of the amount and type and for the achievement of the Bank's liquidity management objectives.

The composition of the Executive Committee at 31.12.2020 was:

CHAIRMAN

Vassilios E. Psaltis, Chief Executive Officer

EXECUTIVE MEMBERS

Spyros N. Filaretos, General Manager – Growth and Innovation Officer

Spyridon A. Andronikakis, General Manager - Chief Risk Officer (CRO)

Lazaros A. Papagaryfallou, General Manager - Chief Financial Officer (CFO)

Sergiu-Bogdan A. Oprescu - General Manager of International Network

Nikolaos V. Salakas, General Manager - Chief Legal and Governance Officer

Ioannis M. Emiris, General Manager Wholesale Banking

Isidoros S. Passas, General Manager Retail Banking

Anastasia Ch. Sakellariou, General Manager - Chief Transformation Officer

Stefanos N. Mytilineos, General Manager - Chief Operating Officer (COO)

The Bank's share are listed in the Athens Exchange since 1925 and included among the companies with the higher market capitalization. Additionally, the Bank's share is included in a series of international indices, such as the FTSE All World, the FTSE4Good Emerging Index and MSCI Small Cap Index. Apart from the Greek Listing, the shares of the Bank are traded over at the counter market (OTC) in New York stock exchange as American Depository Receipts (ADR's).

Total ordinary shares in issue as at 31 December 2020 were 1,543,699,381. An amount of 1,374,525,214 ordinary shares of the Bank are traded in the Athens Stock Exchange, while the Hellenic Financial Stability Fund ("HFSF") possesses the remaining 169,174,167 ordinary, voting, shares or a percentage equals to 10.96% of the total ordinary shares issued by the Bank. The exercise of the voting rights for the shares of HFSF is subject to restrictions according to the article 7a of Law 3864/2010.

During the year of 2020, the average daily volume of the share per session was € 6.535.

The credit rating of the Bank has been assessed by four international credit rating agencies is as follows:

- Moody's: Caa1
- Fitch Ratings: CCC+
- Standard & Poor's: B
- Capital Intelligence: B+

These annual financial statements of the Bank have been approved by the Board of Directors on 23 March, 2021.

ACCOUNTING POLICIES APPLIED

1.1 Basis of presentation

The financial statements for the current period ending at 31.12.2020 have been prepared in accordance with International Financial Reporting Standards (IFRS), as adopted by the European Union, in accordance with Regulation 1606/2002 of the European Parliament and the Council of the European Union on 19 July 2002.

The accounting policies applied by the Bank in preparing the financial statements are the same as those stated in the published financial statements for the year ended on 31.12.2019, after taking into account the amendments to standards which were issued by the International Accounting Standards Board (IASB), adopted by the European Union and applied on 1.1.2020, regarding which further analysis is provided in note 1.1.2.

The financial statements have been prepared on the historical cost basis. However, some assets and liabilities are measured at fair value. Those assets are the following:

- Securities held for trading
- Derivative financial instruments
- Loans and advances to customers measured at fair value through profit or loss
- Investment securities measured at fair value through other comprehensive income
- Investment securities measured at fair value through profit or loss
- The contingent consideration recognized either as a result of a business combination in which the Bank is the acquirer or in the context of asset disposal transactions in which the Bank is the seller.

The financial statements are presented in Euro, rounded to the nearest thousand, unless otherwise indicated.

1.1.1 Going concern

The financial statements as at 31.12.2020 have been prepared based on the going concern principle. For the application of this principle, the Board of Directors took into account current economic developments and made estimates for the formation, in the near future, of the economic environment in which it operates. In this context, the Board of Directors assessed the following areas which are considered important during its assessment:

Developments in the macroeconomic environment

In 2020, the emergence and rapid spread of the Covid-19 pandemic overturned the growth prospects of the global economy, exacerbated the uncertainty of economic developments and worsened labor market conditions. Many governments, in an effort to boost the resilience of their national economies, have been forced to take emergency fiscal measures to support national health systems and ensure employment and entrepreneurship. During the first wave of the pandemic, in March and April, Greece, which is the main country where the Group operates, managed to curb the exponential spread of infections, due to the timely introduction of restrictive measures. Following the gradual easing of the first lockdown from May onwards, economic activity gradually returned to normal in the third quarter of 2020, which was reflected in real GDP growth of 2.3% on a quarterly basis. However, Greece recorded milder growth on a quarterly basis, compared to the Eurozone, as the low performance of tourism-related activities in the third quarter negatively affected growth dynamics. The recovery of economic activity in the summer months was interrupted by the resurgence of the COVID-19 pandemic in the fall, with the result that the recovery in 2021 due to the second wave of the pandemic is expected to be milder than original forecast. The European Commission (Economic Forecasts, Autumn 2020) forecasts a sharp decline in real GDP in 2020 (-9%) and an incomplete recovery in 2021 (5%). Similarly, the latest IMF forecasts, which are included in its latest report (Report on Greece No. 20/308, November 2020) predict a large decline in real GDP in 2020 (-9.5%) and a partial recovery in 2021 (5.7%). The forecasts of the Ministry of Finance, included in the State Budget 2021, predict a recession of 10.5% in 2020 and a slight recovery in 2021 by 4.8%.

It is noted that the Covid-19 pandemic continues to create uncertainty while in the coming period its financial impact is expected to lead to a deterioration in the creditworthiness of individuals and corporates. To date, these effects have been mitigated by banking industry repayment deferrals and government incentives.

The significant fiscal support of the Greek government is estimated to partially offset the negative consequences of the recession. In particular, according to the estimates of the State Budget of 2021, the recession in 2020 could reach 17.5% (support measures for 7.0% of GDP) without fiscal interventions. In addition, of the 4.8% growth rate projected for 2021, 2.5% is attributed to the extension of fiscal support measures and the remaining 2.1% is attributed to the European Union Recovery and Sustainability Fund (RRF). On the other hand, the progress made in the development and distribution of effective vaccines will improve the outlook and strengthen the climate of trust, leading to a virtuous cycle from 2021.

In this context, the key factors that are expected to determine the course of economic activity in 2021 are: First, the extent to which vaccination programs will free up travel and boost private consumption, and second, the activation of the EU Recovery Plan -27 ("Next Generation EU", NGEU).

The prospect of access to the funds of the European Recovery and Resilience Facility (RRF), from the second half of 2021, can significantly enhance the growth potential of the country. The investments that are expected to be made will be mainly focused on green and digital development. In total, during the period 2021-2026, the Greek economy is expected to benefit with Euro 32 billion, of which Euro 19.3 billion relate to grants and Euro 12.7 billion relate to loans on favorable terms. Especially for 2021, Euro 2.6 billion are expected to be raised from the Recovery and Sustainability Mechanism in the form of grants and Euro 1.6 billion from the REACT-EU initiative, as well as Euro 1.3 billion with the form of loans.

Liquidity

Regarding the liquidity levels of the Bank, it is noted that there was no adverse change due to Covid-19 in terms of the ability to draw liquidity from the Eurosystem Mechanisms and from repos interbank transactions. In addition, the Bank made use of the TLTRO III program of the European Central Bank and ensured long-term liquidity with negative interest rates. In this context, the total financing from the European Central Bank on 31.12.2020 amounts to € 11.9 billion (note 27). In addition, it is important that the European Central Bank, in its decisions in March, April and December 2020, accepted the securities of the Hellenic Republic as collateral for liquidity operations. It is noted that the available amount of eligible collaterals through which the drawing of liquidity from the Eurosystem Mechanisms and / or from third sources is ensured, to the extent required, amounts to € 7.9 billion. In addition to the financing from the European Central Bank, the Bank has no liabilities from bond maturities in 2021 and the net amount of repo / reverse repo transactions with other banks as counterparty is very low which means that there is no dependence on a specific counterparty. Also, the Bank completed within the first quarter of 2020 the issuance of a ten-year Tier 2 bond, callable in 5 years, amounting to € 500 million, the interest rate of which rose to 4.25%, gathering high demand. Within 2021, to the extent permitted by the conditions in capital markets, the Bank plans to issue bonds, senior and subordinated. In this context, in order to strengthen its capital, the Bank issued on 4.3.2021 a new Tier 2 bond, amounting to € 500 million, with a 10.25-year maturity callable anytime between year 5 and year 5.25 and with a coupon of 5.5%. In addition, in 2020 there was an increase in private sector deposits of € 4 billion. As a result of the above, the liquidity ratios (liquidity coverage ratio and net stable funding ratio) exceed the supervisory limits that have been set while it is noted that they have been improved compared to last year. Finally, taking into account the situation of the Greek economy and the new conditions due to the pandemic of Covid-19, stress test exercises are carried out regularly for liquidity purposes, in order to assess possible outflows (contractual or potential). The result of the exercises shows that the Bank has sufficient liquidity reserves to meet its needs.

Capital Adequacy

On 31.12.2020, the Common Equity Tier I was 17.5% and the Total Capital Adequacy Ratio was 18.7%. These levels are significantly higher than the levels set by the European Central Bank as further described in note 41. It is also important that due to the spread of Covid-19, the European Central Bank decided to temporarily deviate from the minimum limits of regulatory capital for European Banks at least until the end of 2022. In this context, it is estimated that for the next 12 months the Total Capital Adequacy Ratio is expected to be higher than the limits that have been set.

Strategic Plan 2020-2022

In November 2019, the Bank announced the Strategic Plan (note 48) for the return of the Group to sustainable profitability. The main pillars of the Plan were a) the drastic reduction of non-performing exposures (NPEs), with a particularly significant contribution to it from the Galaxy transaction namely the securitization transaction and subsequent sale of an NPE portfolio b) the transformation of the Group's operating model, c) the creation of additional value through customer-centric development and d) the focus on the efficiency of the organization's operation through the corporate governance system.

During 2020, and despite the unfavorable conditions for the economic environment, the implementation of the Galaxy transaction continued and on 22.2.2021 a definitive agreement was signed with an investor. At the same time, the Bank continued its actions for the organic management of the NPE portfolio, achieving the organic reduction of the NPE balances within 2020, despite the particularly negative developments for the economy. Finally, the efficiency and flexibility of NPE management was further enhanced by the transfer of related activities to Cepal, in the context of the Galaxy transaction. The Bank maintains its strategic target for de-escalation of the ratio NPE to total loan portfolio below 10% in the medium term, as well as for de-escalation of credit risk cost to levels below 100 basis points.

During 2020, the project of transformation of the Bank and its operating model also began, as the design and implementation of a number of interventions and projects aimed at enhancing the efficiency of the organization, optimizing the business model and further strengthening the systems measuring and rewarding performance in all functions were started. The actions are expected to bring significant benefits to a number of Bank operations and at the same time further enhance profitability, reducing operating costs and enhancing the effectiveness of the business model. The Bank takes actions under the strategic plan to reduce the ratio of operating expenses to income at levels below 50% in the medium term.

Based on the above and taking into account:

- the Bank's high capital adequacy,
- the satisfactory liquidity of the Bank,
- the actions taken by the Bank for the management and decrease of the amount of non-performing loans,
- the measures taken by the Bank to protect its employees from coronavirus, the implementation of actions under the Business Continuity Plan and the activation of the ability for teleworking at a large scale whilst ensuring that critical operations are performed,
- the decisions of the eurozone countries to adopt a series of fiscal and other measures to stimulate the economy, according to which Greece is expected to receive € 32 bln from the recovery package for Europe "Next Generation EU"

the Board of Directors estimates that, at least for the next 12 months from the date of approval of the financial statements, the conditions for the application of the going concern principle for the preparation of the financial statements are met.

1.1.2 Adoption of new standards and of amendments to standards

▸ **Amendment to International Financial Reporting Standard 3** "Business Combinations": Definition of a Business (Regulation 2020/551/21.4.2020)

On 22.10.2018 the International Accounting Standards Board issued an amendment to IFRS 3 aimed at resolving the difficulties that arise when an entity determines whether it has acquired a business or a group of assets. The amendments:

- clarify the minimum requirements required in order a business to have been acquired,
- the assessment for the acquisition of either a business or a group of assets is simplified and it is based on current condition of acquired elements rather than on the market participant's ability to integrate them into his own processes,
- the definition of outputs is amended so that apart from the revenue arising from ordinary activities falling within the scope of IFRS 15, it also includes other income from main activities such as income from investment services,
- guidance is added to assess whether a production process is substantive both in cases where a product is produced at the date of acquisition and in cases where there is no product produced,
- an optional exercise is introduced based on the fair value of the assets acquired to assess whether a business or group of assets has been acquired.

The adoption of the above amendment had no impact on the financial statements of the Bank.

▸ **Amendment to International Financial Reporting Standard 9** "Financial Instruments", to **International Accounting Standard 39** "Financial Instruments" and to **International Financial Reporting Standard 7** "Financial instruments: Disclosures": Interest rate benchmark reform (Regulation 2020/34/15.1.2020)

On 26.9.2019 the International Accounting Standards Board issued amendments to IFRS 9, IAS 39 and IFRS 7, according to which temporary exceptions from the application of specific hedge accounting requirements are provided in the context of interest rate benchmark reform.

In accordance with the exceptions, entities applying those hedge accounting requirements may assume that the interest rate benchmark is not altered as a result of the interest rate benchmark reform. Relief is provided regarding the following requirements:

- the highly probable requirement in cash flow hedge,
- prospective assessments,
- designating a component of an item as the hedged item only at the inception of the hedging relationship.

The adoption of the above amendment had no impact on the financial statements of the Bank.

▸ **Amendments to International Accounting Standard 16** "Leases": Covid-19 Related rent concessions (Regulation 2020/1434/9.10.2020)

On 28.10.2020 the International Accounting Standards Board issued amendment to IFRS16 in regards to the accounting treatment of rent concessions occurring as a direct consequence of the Covid-19 pandemic.

According to this amendment, a lessee may elect (practical expedient) not to assess whether a rent concession is a lease modification. The practical expedient is applied for any reduction in lease payments that affects only payments due on or before 30 June 2021.

If the practical expedient is applied, it is assumed that no lease modification has occurred and the lessee may account for the concession as a negative variable lease payment, by recognizing the variable payment in the statement of profit loss and making a corresponding adjustment to the lease liability.

The aforementioned practical expedient is not applicable for the lessors, who continue to apply the existing requirements of the Standard.

The adoption of the above amendment had no impact on the financial statements of the Bank.

▸ **Amendments to International Accounting Standard 1** "Presentation of Financial Statements" and to **International Accounting Standard 8** "Accounting Policies, Changes in Accounting Estimates and Errors: Definition of material (Regulation 2019/2104/29.11.2019)

On 31.10.2018 the International Accounting Standards Board, as part of the Disclosure Initiative, issued amendments to IAS 1 and IAS 8 to align the definition of 'material' across the standards and to clarify certain aspects of the definition.

The new definition states that information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. The amendments include examples of circumstances that may result in material information being obscured. The IASB has also amended the definition of material in the Conceptual Framework to align it with the revised definition of material in IAS 1 and IAS 8.

The adoption of the above amendment had no impact on the financial statements of the Bank.

▸ **Amendments to references in the conceptual Framework in International Financial Reporting Standards** (Regulation 2019/2075/29.11.2019)

On 29.3.2018 the International Accounting Standards Board issued a revised Conceptual Framework for Financial Reporting, which has been used immediately by the Board and the Interpretations Committee in the issuance of new Standards and Interpretations and become effective for the preparation of Financial Statements for annual periods beginning 1 January 2020. The revised Conceptual Framework includes a) new chapters for adding guidance regarding measurement, derecognition, presentation and disclosure and the definition of the reporting entity, b) update of the definition for assets and liabilities and recognition criteria and c) clarifications regarding the necessity of information for management stewardship in order to meet the objective of financial reporting, as well as the roles of prudence, measurement uncertainty and substance over form in assessing whether information is useful.

Together with the revised Conceptual Framework the IASB has also issued Amendments to references to the Conceptual Framework in IFRS Standards in order to ensure the consistency of the related references with the revised Conceptual

Framework. The Conceptual Framework does not override the requirements of the IFRS Standards but is used by the Bank to assist for the development of consistent accounting policies for transactions or other events when no Standard applies.

The adoption of the above amendments had no impact on the financial statements of the Bank.

Except for the standards mentioned above, the European Union has adopted the following amendments to standards which are effective for annual periods beginning after 1.1.2020 and have not been early adopted by the Bank.

▸ **Amendment to International Financial Reporting Standard 4** "Insurance Contracts": Extension of the temporary exception from applying IFRS 9 (Regulation 2020/2097/15.12.2020):

Effective for annual periods beginning on or after 1.1.2021

On 25.6.2020 the International Accounting Standards Board issued an amendment to IFRS 4 with which extended the temporary exception from applying IFRS 9 by two years. In this context, companies that have used the temporary exception from applying IFRS 9 shall apply the standard by 1.1.2023.

The above amendment does not apply to the financial statements of the Bank.

▸ **Amendment to International Financial Reporting Standard 9** "Financial Instruments", to the **International Accounting Standard 9** "Financial Instruments: Recognition and measurement", to **International Financial Reporting Standard 7** "Financial Instruments: Disclosures", to **International Financial Reporting Standard 4** "Insurance Contracts" and **International Financial Reporting Standard 16** "Leases": Interest rate benchmark reform – phase 2 (Regulation 2021/25/13.1.2021)

Effective for annual periods beginning on or after 1.1.2021

On 27.10.2020 the International Accounting Standard Board issued amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 in the context of Phase 2 of the IBOR project that address issues that arise following the reform of an interest rate benchmark rate, including the replacement of one benchmark rate with an alternative one. The key reliefs provided by the Phase 2 amendments are as follows:

- Changes to contractual cash flows. When changing the basis for determining contractual cash flows for financial assets and liabilities (including lease liabilities), the reliefs have the effect that the changes that are required by an interest rate benchmark reform will not result in an immediate gain or loss in the income statement but in the recalculation of the interest rate. The same practical expedient applies for insurers that are applying the temporary exemption from IFRS 9.
- Hedge accounting. The hedge accounting reliefs ensure that changes to the hedge documentation do not result in the discontinuation of hedge accounting nor the designation of a new hedge relationship, as long as the only changes are those permitted by the Phase 2 Amendments. Permitted changes include redefining the hedged risk to reference a risk-free rate and redefining the description of the hedging instruments and/or the hedged items to reflect the risk-free rate. However, additional ineffectiveness might need to be recorded in profit or loss statement.

The Bank is examining the impact from the adoption of the above amendments on its financial statements.

In addition, the International Accounting Standards Board has issued the following standards and amendments to standards which have not yet been adopted by the European Union and they have not been early applied by the Bank.

▸ **Amendment to the International Financial Reporting Standard 3** "Business Combinations": Reference to the Conceptual Framework

Effective for annual periods beginning on or after 1.1.2022

On 14.5.2020 the International Accounting Standards Board amended IFRS 3 in order to update references to the Conceptual Framework. More specifically:

- amended IFRS 3 in order to refer to the latest version of the Conceptual Framework,
- added a requirement that for transactions within the scope of IAS 37 or IFRIC 21 an acquirer applies IAS 37 or IFRIC 21 instead of the Conceptual Framework to identify liabilities it has assumed in a business combination,
- added an explicit statement that an acquirer does not recognise contingent assets acquired in a business combination.

The adoption of the above amendment is not expected to have any impact on the financial statements of the Bank.

▸ **Amendment to International Financial Reporting Standard 10** "Consolidated Financial Statements" and to

International Accounting Standard 28 "Investments in Associates and Joint Ventures": Sale or contribution of assets between an investor and its associate or joint venture.

Effective date: To be determined.

On 11.9.2014 the International Accounting Standards Board issued an amendment to IFRS 10 and IAS 28 in order to clarify the accounting treatment of a transaction of sale or contribution of assets between an investor and its associate or joint venture. In particular, IFRS 10 was amended in order to be clarified that in case that as a result of a transaction with an associate or joint venture, a parent (investor) loses control of a subsidiary, which does not constitute a business, as defined in IFRS 3, it shall recognise to profit or loss only the part of the gain or loss which is related to the unrelated investor's interests in that associate or joint venture. The remaining part of the gain from the transaction shall be eliminated against the carrying amount of the investment in that associate or joint venture. In addition, in case the investor retains an investment in the former subsidiary and the former subsidiary is now an associate or joint venture, it recognises the part of the gain or loss resulting from the remeasurement at fair value of the investment retained in that former subsidiary in its profit or loss only to the extent of the unrelated investor's interests in the new associate or joint venture. The remaining part of the gain is eliminated against the carrying amount of the investment retained in the former subsidiary.

In IAS 28, respectively, it was clarified that the partial recognition of the gains or losses shall be applied only when the involved assets do not constitute a business. Otherwise, the total of the gain or loss shall be recognised.

On 17.12.2015, the International Accounting Standards Board deferred the effective date for the application of the amendment that had been initially determined. The new effective date will be determined by the International Accounting Standards Board at a future date after taking into account the results of its project relating to the equity method.

▸ **International Financial Reporting Standard 14** "Regulatory deferral accounts"

Effective for annual periods beginning on or after 1.1.2016

On 30.1.2014 the International Accounting Standards Board issued IFRS 14. The new standard, which is limited-scope, addresses the accounting treatment and the disclosures required for regulatory deferral accounts that are maintained in accordance with local legislation when an entity provides rate-regulated goods or services. The scope of this standard is limited to first-time adopters that recognized regulatory deferral accounts in their financial statements in accordance with their previous GAAP. IFRS 14 permits these entities to capitalize expenditure that non-rate-regulated entities would recognize as expense.

It is noted that European Union has decided not to launch the endorsement of this standard and to wait for the final standard.

The above standard does not apply to the financial statements of the Bank.

▸ **International Financial Reporting Standard 17** "Insurance Contracts" and **Amendment to International Financial Reporting Standard 17** "Insurance Contracts"

Effective for annual periods beginning on or after 1.1.2023

On 18.5.2017 the International Accounting Standards Board issued IFRS 17 which replaces IFRS 4 "Insurance Contracts". In contrast to IFRS 4, the new standard introduces a consistent methodology for the measurement of insurance contracts. The key principles in IFRS 17 are the following:

An entity:

- identifies as insurance contracts those contracts under which the entity accepts significant insurance risk from another party (the policyholder) by agreeing to compensate the policyholder if a specified uncertain future event adversely affects the policyholder;
- separates specified embedded derivatives, distinct investment components and distinct performance obligations from the insurance contracts;
- divides the contracts into groups that it will recognise and measure;
- recognises and measures groups of insurance contracts at:
  i. a risk-adjusted present value of the future cash flows (the fulfilment cash flows) that incorporates all of the available information about the fulfilment cash flows in a way that is consistent with observable market information; plus (if this value is a liability) or minus (if this value is an asset)

ii. an amount representing the unearned profit in the group of contracts (the contractual service margin);

- recognises the profit from a group of insurance contracts over the period the entity provides insurance cover, and as the entity is released from risk. If a group of contracts is or becomes loss-making, an entity recognises the loss immediately;
- presents separately insurance revenue, insurance service expenses and insurance finance income or expenses; and
- discloses information to enable users of financial statements to assess the effect that contracts within the scope of IFRS 17 have on the financial position, financial performance and cash flows of an entity.

On 25.6.2020 the International Accounting Standards Board issued an amendment to IFRS 17 which aimed to ease implementation of the standard and make it easier for entities to explain their financial performance. Additionally, with the amendment the effective date of the standard was postponed to 1.1.2023.

The above standard does not apply to the financial statements of the Bank.

▸ **Amendment to the International Accounting Standard 1** “Presentation of Financial Statements”: Classification of liabilities as current or non-current

Effective for annual periods beginning on or after 1.1.2022

On 23.1.2020, the International Accounting Standards Board issued amendments to IAS 1 relating to the classification of liabilities as current or non-current. More specifically:

- The amendments specify that the conditions which exist at the end of the reporting period are those which will be used to determine if the liability must be classified as current or non-current.
- Management expectations about events after the balance sheet date must not be taken into account.
- The amendments clarify the situations that are considered settlement of a liability.

On 15.7.2020 the International Accounting Standards Board extended effective date by one year taking into account the impact of Covid-19.

The above amendment will have no impact on the financial statements of the Bank since in Bank’s balance sheet liabilities are not classified as current and non-current.

▸ **Amendment to the International Accounting Standard 1** “Presentation of Financial Statements”: Disclosure of accounting policies

Effective for annual periods beginning on or after 1.1.2023

On 12.2.2021 the International Accounting Standards Board issued an amendment to IAS 1 with which it clarified that:

- The definition of accounting policies is provided by paragraph 5 of IAS 8.
- An entity shall disclose material accounting policy information. Accounting policy information is material if, when considered together with other information included in an entity’s financial statements, it can reasonably be expected to influence decisions that the primary users of financial statements make.
- Accounting policy information that relates to immaterial transactions is immaterial and need not be disclosed. Accounting policy information may nevertheless be material because of the nature of the related transactions even if the amounts are immaterial. However, not all accounting policy information relating to material transactions and other events is itself material.
- Accounting policy information is material if users of an entity’s financial statements would need it to understand other material information in the financial statements.
- Accounting policy information that focuses on how an entity has applied an accounting policy is more useful to users of financial statements than standardized information or information that only summarizes the requirements of IFRSs.
- If an entity discloses immaterial accounting policy information, such information shall not obscure material accounting policy information.

The Bank is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Amendment to the International Accounting Standard 8** “Accounting Policies, Changes in Accounting Estimates and Errors”: Definition of accounting estimates

Effective for annual periods beginning on or after 1.1.2023

On 12.2.2021 the International Accounting Standards Board issued an amendment to IAS 8 with which:

- Defined accounting estimates as monetary amounts in financial statements that are subject to measurement uncertainty.
- Clarified that an accounting policy may require items in financial statements to be measured in a way that involves measurement uncertainty. In such a case, an entity develops an accounting estimate. Developing accounting estimates involves the use of judgements and assumptions.
- An entity uses measurement techniques and inputs to develop an accounting estimate.
- An entity may need to change an accounting estimate. By its nature, a change in an accounting estimate does not relate to prior periods and is not the correction of an error. A change in an input or a change in a measurement technique are changes in accounting estimates unless they result from the correction of prior period errors.

The Bank is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Amendment to International Accounting Standard 16** "Property, plant and equipment": Proceeds before intended use

Effective for annual periods beginning on or after 1.1.2022

On 14.5.2020 the International Accounting Standards Board issued an amendment to IAS 16 according to which prohibits deducting from the cost of an item of property, plant and equipment any proceeds from selling items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, the proceeds from selling such items and the cost of producing them must be recognized in profit or loss.

The Bank is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Amendment to International Accounting Standard 37** "Liabilities, Contingent Liabilities and Contingent Assets": Onerous Contracts – Cost of fulfilling a contract

Effective for annual periods beginning on or after 1.1.2022

On 14.5.2020 the International Accounting Standards Board issued an amendment to IAS 37 in order to clarify that the cost of fulfilling a contract comprises the costs that relate directly to the contract. These costs are both the incremental costs of fulfilling a contract – for example direct labour and materials- and an allocation of other costs that relate directly to fulfilling a contract – for example the depreciation charge of an item of property plant and equipment used in fulfilling that contract.

The Bank is examining the impact form the adoption of the above amendment on its financial statements.

▸ **Annual Improvements** – cycle 2018-2020

Effective for annual periods beginning on or after 1.1.2022

As part of the annual improvements project, the International Accounting Standards Board issued on 14.5.2020 non-urgent but necessary amendments to IFRS 1, IFRS 9, IFRS 16 and IAS 41.

The above amendments are not expected to have any impact on the financial statements of the Bank.

1.2 Accounting policies

1.2.1 Operating Segments

Operating segments are determined and measured based on the information provided to the Executive Committee of the Bank, which is the body responsible for the allocation of resources between the Bank's operating segments and the assessment of their performance.

Based on the above, and given the Bank's administrative structure and activities, the following operating segments have been determined:

- Retail Banking
- Corporate Banking
- Asset Management and Insurance
- Investment Banking and Treasury
- Other

Since the Bank operates in various geographical areas, apart from the operating segments identified above, the financial statements contain information based on the below distinction:

- Greece
- Other Countries

It is noted that the methods used to measure operating segments for the purpose of reporting to the Executive Committee are not different from those required by the International Financial Reporting Standards.

Detailed information relating to operating segments is provided in note 39.

1.2.2 Transactions in foreign currency and translation of foreign operations

a. Transactions in foreign currency

The financial statements are presented in Euro, which is the functional currency and the currency of the Bank's country of incorporation.

Items included in the financial statements for foreign branches are measured at the functional currency which is the currency of the country of incorporation in which the branch operates or the currency used in the majority of the transactions held.

Transactions in foreign currencies are translated into the functional currency at the closing exchange rate at the date of the transaction.

Monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the closing exchange rate at the balance sheet date. Foreign exchange differences arising from the translation are recognized in the income statement.

Non-monetary assets and liabilities are translated using the rate of exchange at the transaction date, except for non-monetary items denominated in foreign currencies that are measured at fair value which are translated at the exchange rate of the date that the fair value is determined.

The exchange differences relating to these items are part of the change in fair value and they are recognized in the income statement or recorded directly in equity depending on the classification of the non-monetary item.

b. Translation of foreign operations

The results and financial position of all foreign branches that have a functional currency that is different from the presentation currency of the Bank's financial statements are translated as follows:

i. Assets and liabilities are translated to Euro at the closing rate applicable on the balance sheet date. The comparative figures presented are translated to Euro at the closing rates at the respective date of the comparative balance sheet.
ii. Income and expense items are translated to Euro at average exchange rates applicable for each period presented.

The resulting exchange differences from the above translation and those arising from other monetary items designated as a part of the net investment in a foreign entity are recorded in equity. These translation differences are reclassified to the income statement when a foreign branch is sold.

1.2.3 Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents consists of:

a. Cash on hand
b. Non-restricted balances with Central Banks and
c. Short-term balances due from banks and Reverse Repo agreements

Short-term balances are amounts that mature within three months of the balance sheet date.

Non-restricted placements with Central Banks, short-term balances due from banks and Reverse Repo agreements are measured at amortised cost.

1.2.4 Classification and measurement of financial instruments

Initial recognition

The Bank recognises financial assets or financial liabilities in its statement of financial position when it becomes a party to the terms of the contract.

At initial recognition the Bank measures financial assets and liabilities at fair values. Financial instruments not measured at fair value through profit or loss are initially recognised at fair value plus or minus transaction costs and income or fees that are directly attributable to the acquisition or issue of the financial instrument.

Regular way purchases and sales of financial instruments are recognized at the settlement date with the exception of equity shares and derivatives that are recognized at the trade date. For bonds that are measured at fair value, the change in fair value during the period between the trade date and the settlement date is recognized in profit or loss or in other comprehensive income based on the bond's classification category.

Subsequent measurement of financial assets

The Bank classifies its financial assets as:

- Financial assets measured at amortised cost,
- Financial assets measured at fair value through other comprehensive income, with gains or losses reclassified in profit or loss on derecognition,
- Equity instruments measured at fair value through other comprehensive income, with no reclassification in gains or losses to profit or loss on derecognition,
- Financial assets measured at fair value through profit or loss.

For each of the above categories the following apply:

a) Financial assets measured at amortised cost

In this category are classified the financial assets that satisfy both of the following criteria:

- are held within a business model whose objective is to hold financial assets in order to collect contractual cash flows,
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

The above category is measured at amortised cost using the effective interest method and is periodically assessed for expected credit losses, as it is further described in notes 1.2.12 and 1.2.13.

b) Financial assets measured at fair value through other comprehensive income, with gains or losses reclassified in profit or loss on derecognition

In this category are classified the financial assets that satisfy both of the following criteria:

- are held within a business model whose objective is both to collect contractual cash flows and selling financial assets,
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

The above category is periodically assessed for expected credit losses, as it is further described in notes 1.2.12 and 1.2.13.

c) Equity instruments measured at fair value through other comprehensive income, with no reclassification in gains or losses to profit or loss on derecognition

In this category are classified equity instruments that are neither held for trading nor contingent consideration recognised by an acquirer in a business combination and that Bank decides, at initial recognition, to measure at fair value through other comprehensive income. This decision is irrevocable. With the exception of dividends, which are directly recognized in profit or loss, all other gains and losses arising from those instruments are directly recognized in other comprehensive income and are not reclassified to profit or loss. For those equity instruments there is no impairment assessment.

d) Financial assets measured at fair value through profit or loss

Financial assets included in this category are:

i. those acquired principally for the purpose of selling in the near term to obtain short term profit (held for trading).

The Bank has included in this category bonds, treasury bills and a limited number of shares.

ii those that do not meet the criteria to be classified into one of the above categories

iii. those the Bank designated, at initial recognition, as at fair value through profit or loss. This classification option, which is irrevocable, is used when the designation eliminates an accounting mismatch which would otherwise arise from measuring financial assets and liabilities on a different basis (i.e. amortised cost) in relation to another financial asset or liability (i.e. derivatives which are measured at fair value through profit or loss).

As at the reporting date, the Bank had not designated, at initial recognition, any financial assets as at fair value through profit or loss.

Business Model assessment

The business model reflects how the Bank manages its financial assets in order to generate cash flows. That is, the Bank's business model determines whether cash flows will result from collecting contractual cash flows, selling financial assets or both. The Bank's business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. Accordingly, business model does not depend on management's intentions for an individual instrument but it is determined on a higher level of aggregation.

The business models of the Bank are determined by the Asset Liability Committee (ALCO) or the Executive Committee (ExCo) which decide on the determination of the business model both for the loans and advances to customers and the securities portfolio. In this context:

- Loans and advances to customers and due from banks are included in the business model whose objective is to hold financial assets in order to collect contractual cash flows (hold to collect)
- For bonds and in general for fixed income investments, the Bank has identified the following business models:
  - Business model whose objective is to hold financial instruments in order to collect their contractual cash flows (hold to collect)
  - Business model that aims both at collecting contractual cash flows and selling (hold to collect and sell)
  - Trading portfolio.

The determination of the above business models has been based on:

- The way the performance of the business model and the financial assets held within that business model are evaluated and reported to the Bank key management personnel.
- The risks that affect the performance of the business model (and the financial assets held within that business model) and, specifically, the way those risks are managed.
- The way the managers are evaluated (e.g., whether the evaluation is based on the fair value of the assets managed or the contractual cash flows collected).
- Past and expected frequency and value of sales from the portfolio.

The Bank, at each reporting date, reassesses its business models in order to confirm that there has been no change compared to the prior period or application of a new business model. In the context of the reassessment of the hold to collect business model past sales as well as expected future sales are taken into account. In this assessment, the following cases of sales are considered consistent with a hold to collect business model:

a) Sales of non performing loans due to the credit deterioration of the debtor, excluding those sales of loans considered as credit impaired at origination.

b) Sales made close to the maturity of the financial assets so that the proceeds from the sales approximate the collection of the remaining contractual cash flows. In these cases, the Bank defines as “close”, what is less than 5% of the total life of the instrument remaining at the time of sale.

c) Sales (excluding a and b) which are infrequent (even if significant in value) or insignificant in value both individually and in aggregate (even if frequent). The Bank has defined the following thresholds:
   - Significance: Sales exceeding 5% the previous reporting period gross balance of the respective portfolio
   - Frequency: Significant sale transactions occurring more than twice a year.

In addition, for bond portfolio the following sales are considered consistent with a hold to collect business model:

- Sales of bonds that do not longer meet the requirements stated in the investment policy due to a significant increase in issuer's credit risk.
- Infrequent sales under liquidity stress conditions.

Solely Payments of Principal and Interest (SPPI) assessment of the contractual cash flows

For the purposes of applying the SPPI assessment:

- Principal is the fair value of the asset at initial recognition, which may change over the life of the financial asset, (for example if there are repayments of principal).
- Interest is the consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks (i.e. liquidity risk) and costs, as well as a profit margin.

Contractual terms that introduce exposure to risks and volatility in the contractual cash flows that are not related to a basic lending arrangement, such as exposure to changes in equity prices or commodity prices, do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding.

In this context, in assessing whether contractual cash flows are SPPI, the Bank assesses whether the instrument contain contractual terms that change the timing or amount of contractual cash flows. More specifically, the following are taken into account:

- Leveraged payments
- Payments linked with the variability in exchange rates
- Conversion to equity terms
- Interest rates indexed to non-interest variables
- Prepayment or extension options
- Terms that limit the Bank's claim to the cash flows from specified assets or based on which the Bank has no contractual right to unpaid amounts
- Interest-free deferred payments
- Terms based on which the performance of the instruments is affected by equity or commodity prices

Especially in the case of financing of a special purpose vehicle, in order for the loan to meet the criterion that its cash flows are solely payments of principal and interest on the principal amount outstanding, among other, at least one of the following conditions should apply:

- At initial recognition, LTV (Loan to Value) shall not exceed the threshold of 80% or LLCR (Loan Life Coverage Ratio) shall be at least equal to the threshold of 1.25.
- The equity of the special purpose vehicle shall amount to at least 20% of its total assets.
- There are sufficient collaterals that are not related to the asset being funded.

In addition, in determining whether contractual cash flows are solely payments of principal and interest on the principal amount outstanding, it is assessed whether time value of money element has been modified. Time value of money is the element of interest that provides consideration for only the passage of time. That is, the time value of money element does not provide consideration for other risks or costs associated with holding the financial asset. However, in some cases, the time value of money element may be modified. That would be the case, for example, if a financial asset's interest rate is periodically reset but the frequency of that reset does not match the tenor of the interest rate or if a financial asset's interest rate is periodically reset to an average of particular short- and long-term interest rates. In such cases, the Bank assesses the modification to determine whether the contractual cash flows represent solely payments of principal and interest on the principal amount outstanding. The objective of the assessment is to determine how different the contractual (undiscounted) cash flows could be from the (undiscounted) cash flows that would arise if the time value of money element was not modified (benchmark test). The effect of the modified time value of money element must be considered in each reporting period and cumulatively over the life of the instrument. If the Bank concludes that the contractual (undiscounted) cash flows could be significantly different from the (undiscounted) benchmark cash flows, the contractual cash flows are not solely payments of principal and interest on the principal amount outstanding. According to the policy set by the Bank, the above assessment test does not result in significant different contractual cash flows when the cumulative difference over the life of the instrument does not exceed 10% and at the same time the number of individual cash flows with a difference of more than 10% do not exceed 5% of total reporting periods of the asset until maturity.

Reclassification of financial assets

Reclassifications of financial assets between measurement categories occur when, and only when, the Bank changes its business model for managing the assets. In this case the reclassification is applied prospectively. Changes in the business model of the Bank are expected to be rare. They arise from decisions of the Asset Liability Committee (ALCO) or the Executive Committee (ExCo) as a result of external or internal changes which must be significant to the entity's operations and demonstrable to external parties.

If the Bank reclassifies a financial asset out of the amortised cost measurement category and into the fair value through profit or loss measurement category, its fair value is measured at the reclassification date. Any gain or loss arising from a difference between the previous amortised cost of the financial asset and fair value is recognized in profit or loss. The same happens if the Bank reclassifies a financial asset out of the amortised cost measurement category and into the fair value through other comprehensive income measurement category, however in this case the difference between the previous amortised cost of the financial asset and fair value is recognized in other comprehensive income. The effective interest rate and the measurement of expected credit losses are not adjusted as a result of the reclassification. However, the loss allowance would be derecognized (and thus would no longer be recognized as an adjustment to the gross carrying amount) but instead would be recognized as an accumulated impairment amount in other comprehensive income.

If the Bank reclassifies a financial asset out of the fair value through profit or loss measurement category and into the amortised cost measurement category, its fair value at the reclassification date becomes its new gross carrying amount. At this date, the effective interest rate of the asset is calculated while the date of the reclassification is treated as the date of initial recognition for impairment calculation purposes.

If the Bank reclassifies a financial asset out of the fair value through profit or loss measurement category and into the fair value through other comprehensive income measurement category, the financial asset continues to be measured at fair value. As in the above case, at this date, the effective interest rate of the asset is calculated while the date of the reclassification is treated as the date of initial recognition for impairment calculation purposes.

If a financial asset is reclassified out of the fair value through other comprehensive income measurement category and into the amortised cost measurement category, the asset is reclassified at its fair value at the measurement date. However, the cumulative gain or loss previously recognized in other comprehensive income is reversed and adjusted against the fair value of the financial asset at the reclassification date. As a result, the financial asset is measured at the reclassification date as if it had always been measured at amortised cost. This reversal affects other comprehensive income but does not affect profit or loss and therefore is not a reclassification adjustment under IAS 1. The effective interest rate and the calculation of expected credit losses are not affected. However, the loss allowance is recognized as an adjustment to the gross carrying amount of the financial asset from the reclassification date.

If the Bank reclassifies a financial asset out of the fair value through other comprehensive income measurement category and into the fair value through profit or loss measurement category, the financial asset continues to be measured at fair value. The cumulative gain or loss previously recognised in other comprehensive income is reclassified from equity to profit or loss as a reclassification adjustment (in accordance with IAS 1) at the reclassification date.

Derecognition of financial assets

The Bank derecognizes financial assets when:

- the contractual rights to the assets cash flows expire,
- the contractual rights to receive the cash flows of the financial assets are transferred and at the same time all the risks and rewards of ownership are substantially transferred,
- loans or investments in securities are no longer recoverable and consequently are written off,
- the contractual cash flows of the assets are significantly modified.

In the case of transactions where despite the transfer of the contractual right to receive the cash flows from financial assets both the risk and rewards remain with the Bank, no derecognition of these financial assets occurs. The amount received by the transfer is recognized as a financial liability. The accounting practices followed by the Bank in such transactions are discussed in notes 1.2.20 and 1.2.21.

In the case of transactions, whereby the Bank neither retains nor transfers risks and rewards of the financial assets, but retains control over them, the financial assets are recognized to the extent of the Bank's continuing involvement. If the Bank does not retain control of the assets then they are derecognised, and in their position the Bank recognizes, distinctively, the assets and liabilities which are created or retained during the transfer. No such transactions occurred upon balance sheet date.

In case of a change in the contractual terms of a financial asset, the change is considered significant and therefore it results in the derecognition of the original financial asset and the recognition of a new one when one of the following criteria is met:

- Change of issuer/debtor
- Change in denomination currency
- Consolidation of different types of contracts
- Consolidation of contracts that do not entirely satisfy the criterion that cash flows are solely payments of principal and interest on the principal amount outstanding
- Addition or deletion of equity conversion terms
- Separation of a non-SPPI debt instrument into two or more new instruments so that the reason that leads to SPPI failure of the original instrument is not included in all of the new instruments.
- Significant modifications occurring due to the commercial renegotiation of the contractual terms of performing borrowers.

In case of derecognition due to significant modification, the difference between the carrying amount of the original asset and the fair value of the new asset is directly recognized in the Income Statement as specifically mentioned in notes 1.2.25 and 1.2.26. Additionally, in case the original asset was measured at fair value through other comprehensive income, the cumulative gains or losses recognized in other comprehensive income are transferred to profit or loss.

In contrast, if the change in contractual cash flows is not significant, the gross carrying amount of the asset is recalculated by discounting new contractual cash flows with the original effective interest rate and the difference compared to the current gross carrying amount is directly recognized in profit or loss (modification gain or loss) in the line item "Impairment losses and provisions to cover credit risk". Fees related to the modification adjust the carrying amount of the asset and are amortised over the remaining term of the modified financial asset through the effective interest method.

Subsequent measurement of financial liabilities

The Bank classifies financial liabilities in the following categories for measurement purposes:

a) Financial liabilities measured at fair value through profit or loss

i. This category includes financial liabilities held for trading, that is:

  - financial liabilities acquired or incurred principally with the intention of selling or repurchasing in the near term for short term profit, or
  - derivatives not used for hedging purposes. Liabilities arising from either derivatives held for trading or derivatives used

for hedging purposes are presented as "derivative financial liabilities" and are measured according to the principles set out in note 1.2.5.

ii. this category also includes financial liabilities which are designated by the Bank as at fair value through profit or loss upon initial recognition, when:
- doing so results in more relevant information, because either:
  - it eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases; or
  - a group of financial liabilities or financial assets and financial liabilities is managed and its performance is evaluated on a fair value basis, in accordance with a documented risk management or investment strategy, and information about the Bank is provided internally on that basis to the Bank's key management personnel; or
- the contract contains one or more embedded derivatives and the Bank measures the compound financial instrument as a financial liability measured at fair value through profit or loss unless:
  - the embedded derivative does not significantly modify the cash flows that otherwise would be required by the contract or
  - it is clear with little or no analysis when a similar hybrid instrument is first considered that the separation of the embedded derivative(s) is prohibited.

It is noted that in the above case, the amount of the change in fair value attributable to the Bank's credit risk is recognized in other comprehensive income, unless this treatment would create or enlarge an accounting mismatch in profit or loss. Amounts recognized in other comprehensive income are never transferred to profit or loss.

As at the reporting date, the Bank had not designated, at initial recognition, any financial liabilities as at fair value through profit or loss.

b) Financial liabilities carried at amortised cost

The liabilities classified in this category are measured at amortised cost using the effective interest method.

Liabilities to credit institutions and customers, debt securities issued by the Bank and other loan liabilities are classified in this category.

In cases when financial liabilities included in this category are designated as the hedged item in a hedge relationship, the accounting principles applied are those set out in note 1.2.5.

c) Liabilities arising from financial guarantees and commitments to provide loans at a below market interest rate

A financial guarantee contract is a contract that requires the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payments when due in accordance with the agreed terms.

The financial guarantee contracts and the commitments to provide loans at a below market interest rate are initially recognized at fair value, and measured subsequently at the higher of:

- the amount of the provision determined during expected credit loss calculation (note 1.2.12),
- the amount initially recognised less cumulative amortization which is calculated based on the term of the instrument.

d) Financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition or when the continuing involvement approach applies

In the first case the liability should be equal to the amount received during the transfer while in the second case it should measured in such a way that the net carrying amount of the transferred asset and the associated liability is:

- The amortised cost of the rights and obligations retained by the Bank, if the transferred asset is measured at amortised cost or
- Equal to the fair value of the rights and obligations retained by the Bank when measured on a stand-alone basis, if the transferred asset is measured at fair value.

e) Contingent consideration recognized by an acquirer in a business combination

Such contingent consideration is subsequently measured at fair value with changes recognized in profit or loss.

Derecognition of financial liabilities

Financial liabilities (or part thereof) are derecognized when the contractual obligation is been discharged, cancelled or expires.

When a financial liability is exchanged for another liability with substantially different terms, the exchange is accounted for as an extinguishment of the original financial liability and the recognition of a new one. The same applies in cases of a substantial modification of the terms of an existing financial liability or a part of it (whether or not attributable to the financial difficulty of the debtor). The terms are considered substantially different if the discounted present value of the cash flows under the new terms (including any fees paid net of any fees received), discounted using the original effective interest rate, is at least 10% different from the present value of the remaining cash flows of the original financial liability.

In cases of derecognition, the difference between the carrying amount of the financial liability (or part of the financial liability) extinguished or transferred to another party and the consideration paid, including any non-cash assets transferred or liabilities assumed, is recognised in profit or loss.

Offsetting financial assets and financial liabilities

Financial assets and liabilities are offset and the amounts are reported net on the balance sheet, only when the Bank has the legally enforceable right to offset recognized amounts and there is the intention to settle on a net basis, or to realize the asset and settle the liability simultaneously.

1.2.5 Derivative financial instruments and hedge accounting

Derivative financial instruments

Derivatives are financial instruments that upon inception have a minimal or zero fair value that subsequently changes in accordance with a particular underlying instrument or indices defined in the contract (foreign exchange, interest rate, index or other variable).

All derivatives are recognized as assets when their fair value is positive and as liabilities when their fair value is negative.

Derivatives are entered into for either hedging or trading purposes and they are measured at fair value irrespective of the purpose for which they have been transacted.

The change in the fair value of the interest and currency derivatives, excluding options, is separated into interest, foreign exchange differences and other gains or losses from financial transactions.

In case a derivative is embedded in a financial asset, the embedded derivative is not separated and the hybrid contract is accounted for based on the classification requirements mentioned in note 1.2.4.

In case a derivative is embedded in a host contract, other than a financial asset, the embedded derivative is separated and measured at fair value through profit or loss when the following conditions are met:

- the economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host,
- a separate instrument with the same terms as the embedded derivative would meet the definition of a derivative; and
- the hybrid contract is not measured at fair value with changes in fair value recognised in profit or loss.

The Bank uses derivatives as a means of exercising Asset-Liability management within the guidelines established by the Asset-Liability Committee (ALCO).

In addition the Bank uses derivatives for trading purposes to exploit short-term market fluctuations, within the Bank risk level set by the Asset-Liability Committee (ALCO).

Valuation differences arising from derivatives are recognized in Gains less losses on financial transactions except when derivatives participate in hedging relationships in which case the principles for hedge accounting mentioned below apply.

When the Bank uses derivatives for hedging purposes hedge relationships are formally designated and documented at inception, and effectiveness is monitored on an ongoing basis at each balance sheet date.

We emphasize the following:

a. Synthetic Swaps

The Bank, in order to increase the return on deposits to selected customers, uses synthetic swaps.

This involves the conversion of a Euro deposit to JPY or other currency with a simultaneous forward purchase of the related currency to cover the foreign exchange exposure.

The result arising from the forward transaction is recognized as interest expense, which is included in deposits' interest expense, foreign exchange differences and other gains less losses on financial transactions.

b. FX Swaps

These types of swaps are entered into primarily to economically hedge the exposures arising from customer loans and deposits.

For those cases for which no hedge accounting is applied, swaps are accounted for as trading instruments.

The result arising from these derivatives is recognized as interest and foreign exchange differences, in order to match with the interest element and foreign exchange differences resulting from the deposits and loans, and as other gains less losses on financial transactions.

Hedge accounting

Hedge accounting establishes the valuation rules to offset the gain or loss of the fair value of a hedging instrument and a hedged item which would not have been possible if the normal measurement principles were applied. It is noted that the Bank has opted to continue to apply the provisions for hedge accounting of IAS 39.

Documentation of the hedging relationship upon inception and of the effectiveness of the hedge on an on-going basis are the basic requirements for the adoption of hedge accounting.

The hedge relationship is documented upon inception and the hedge effectiveness test is carried out upon inception and is repeated at each reporting date.

A hedge is regarded as highly effective only if both of the following conditions are met:

- at the inception of the hedge and in subsequent periods the hedge is expected to be highly effective in achieving offsetting changes in fair value or cash flows attributable to the hedged risk during the period for which the hedge is designated,
- the results of the hedge are within a range of 80%-125% of the results of the hedged item.

a. Fair value hedges

A fair value hedge of a financial instrument offsets the change in the fair value of the hedged item in respect of the risks being hedged.

Changes in the fair value of both the hedging instrument and the hedged item, in respect of the specific risk being hedged, are recognized in the income statement.

When the hedging relationship no longer exists, the hedged items continue to be measured based on the classification and valuation principles set out in note 1.2.4. Specifically any adjustment, due to the fair value change of a hedged item for which the effective interest method is used, up to the point that the hedging relationship ceases to be effective, is amortised to interest income or expense based on a recalculated effective interest rate, over its remaining life.

The Bank uses interest rate swaps (IRS's) to hedge risks relating to borrowings and loans. It also uses foreign exchange derivatives to hedge the foreign exchange risk of investments in subsidiaries.

b. Cash flow hedge

A cash flow hedge changes the cash flows of a financial instrument from a variable rate to a fixed rate.

The effective portion of the gain or loss on the hedging instrument is recognized directly in other comprehensive income, in cash flow hedge reserve, whereas the ineffective portion is recognized in Gains less losses on financial transactions. The accounting treatment of the hedged item does not change.

When the hedging relationship is discontinued, the amount recognized in equity remains there separately until the cash flows or the future transaction occur. When the cash flows or the future transaction occur the following apply:

- If the result is the recognition of a financial asset or a financial liability, the amount is reclassified to profit or loss in the same periods during which the hedged forecast cash flows affect profit or loss.
- If the result is the recognition of a non-financial asset or a non-financial liability or a firm commitment for which fair value hedge accounting is applied, the amount recognized in equity either is reclassified to profit or loss in the same periods during which the asset or the liability affect profit or loss or adjusts the carrying amount of the asset or the liability.

When a forecasted transaction or the expected cash flows are no longer expected to occur, the cumulative gain or loss that was recognized in equity is reclassified to profit or loss. In particular, the amount that has been recognized in equity, as a result of revoked cash flow hedging relationships for term deposits, is linearly amortised as interest expense in the periods during which the hedged cash flows from the aforementioned term deposits affect profit or loss.

c. Hedges of net investment in a foreign operation

Hedge accounting of net investment in a foreign operation is similar to cash flow hedge accounting. The cumulative gain or loss recognized in equity is reversed and recognized in profit or loss, at the time that the disposal of the foreign operation takes place.

1.2.6 Fair Value Measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date, in the principal market for the asset or liability or, in the absence of a principal market, in the most advantageous market for the asset or liability.

The Bank measures the fair value of assets and liabilities traded in active markets based on available quoted market prices. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. Especially, for the measurement of securities, the Bank uses a particular range of prices, within the bid-ask spread, in order to characterize the prices as prices of an active market (the difference between bid and ask prices quoted should not exceed 1.5/100 nominal value). Furthermore, if quoted market prices are not available on the measurement date, but they are available during the three last working days of the reporting period and there are quoted prices for 15 working days during the last month of the reporting period and the criteria of the bid-ask spread is met, then the market is considered to be active.

The fair value of financial instruments that are not traded in an active market is determined by the use of valuation techniques, appropriate in the circumstances, and for which sufficient data to measure fair value are available, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs. If observable inputs are not available, other model inputs are used which are based on estimations and assumptions such as the determination of expected future cash flows, discount rates, probability of counterparty default and prepayments. In all cases, the Bank uses the assumptions that "market participants" would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

Assets and liabilities which are measured at fair value or for which - fair value is disclosed-, are categorized according to the inputs used to measure their fair value as follows:

- Level 1 inputs: quoted market prices (unadjusted) in active markets,
- Level 2 inputs: directly or indirectly observable inputs,
- Level 3 inputs: unobservable inputs used by the Bank, to the extent that relevant observable inputs are not available.

In particular, the Bank applies the following:

Financial instruments

For financial instruments the best evidence of fair value at initial recognition is the transaction price, unless the fair value can be derived by other observable market transactions relating to the same instrument, or by a valuation technique using mainly observable inputs. In these cases, if the fair value differs from the transaction price, the difference is recognized in the statement of comprehensive income. In all other cases, fair value is adjusted to defer the difference with the transaction price. After initial recognition, the deferred difference is recognized as a gain or loss only to the extent that it arises from a change in a factor that market participants would take into account when pricing the instrument.

When measuring fair value, the Bank takes into consideration the effect of credit risk. Specifically, for derivative contracts, the Bank estimates the credit risk of both counterparties (bilateral credit valuation adjustments).

The Bank measures fair value for all assets and liabilities separately. Regarding derivative exposures, however, that the Bank manages as a group on a counterparty basis and for which it provides information to the key management personnel, the fair value measurement for credit risk is performed based on the net risk exposure per counterparty. Credit valuation adjustments arising from the aforementioned process are allocated to either assets or liabilities, depending on whether the net exposure to the counterparty is long or short respectively.

Furthermore, the fair value of deposit accounts with a demand feature (such as saving deposits) is no less than the amount payable on demand, discounted from the first date that the amount could be required to be paid.

The principal inputs to the valuation techniques used by the Bank are:

- Bond prices - quoted prices available for government bonds and certain corporate securities.
- Credit spreads - these are derived from active market prices, prices of credit default swaps or other credit based instruments, such as debt. Values between and beyond available data points are obtained by interpolation and extrapolation.
- Interest rates - these are principally benchmark interest rates such as the LIBOR, OIS and other quoted interest rates in the swap, bond and futures markets. Values between and beyond available data points are obtained by interpolation and extrapolation.
- Foreign currency exchange rates - observable markets both for spot and forward contracts and futures.
- Equity and equity index prices - quoted prices are generally readily available for equity shares listed on stock exchanges and for major indices on such shares.
- Price volatilities and correlations - Volatility and correlation values are obtained from pricing services or derived from option prices.
- Unlisted equities - financial information specific to the company or industry sector comparables.
- Mutual Funds- for open-ended investments funds listed on a stock exchange the published daily quotations of their net asset values (NAVs).
- Loans and Deposits – market data and Bank/customer specific parameters.

NON FINANCIAL ASSETS AND LIABILITIES

The most important category of non financial assets for which fair value is estimated is real estate property.

The process, mainly, followed for the determination of the fair value is summarized below:

- Assignment to the engineer- valuer
- Case study- Setting of additional data
- Autopsy - Inspection
- Data processing - Calculations
- Preparation of the valuation report

To derive the fair value of the real estate property, the valuer chooses among the three following valuation techniques:

- Market approach (or sales comparison approach), which measures the fair value by comparing the property to other identical ones for which information on transactions is available.
- Income approach, which capitalizes future cash flows arising from the property using an appropriate discount rate.
- Cost approach, which reflects the amount that would be required currently to replace the asset with another asset with similar specifications, after taking into account the required adjustment for impairment.

Examples of inputs used to determine the fair value of properties and which are analysed to the individual valuations, are the following:

- **Commercial property:** price per square meter, rent growth per annum, long-term vacancy rate, discount rate, expense rate of return, lease term, rate of non leased properties/units for rent.
- **Residential property:** Net return, reversionary yield, net rental per square meter, rate of continually non leased properties/units, expected rent value per square meter, discount rate, expense rate of return, lease term etc.
- **General assumptions such as** the age of the building, residual useful life, square meter per building etc. are also included in the analysis of the individual valuation assessments.

It is noted that the fair value measurement of a property takes into account a market's participant ability to generate economic benefits by using the asset in it's highest and best use or by selling it to another market participant that would use the asset in it's highest and best use.

1.2.7 Investments in subsidiaries, associates and joint ventures

This caption includes Bank's investments in subsidiaries, associates and joint ventures.

Investments in subsidiaries, associates and joint ventures are carried at cost, plus any expenses directly attributable to their acquisition less impairment losses.

Dividends received by the Bank from the above investments are recognised in the income statement when the dividend distribution is approved by the appropriate body of the company that the Bank has invested in.

In case of absorption of a subsidiary or of a sector that satisfies the definition of a business, the Bank applies the provisions of IFRS 3 for business combinations, as described in more detail in note 1.2.1 of the consolidated financial statements as at 31.12.2020.

1.2.8 Property, plant and equipment

This caption includes: land, buildings used by the branches or for administrative purposes, additions and improvements of leased property and equipment. It also includes right of use assets in case those assets are used by the Bank (the accounting policies applicable to those assets are presented in note 1.2.11).

Property, plant and equipment are initially recognised at cost which includes any expenditure directly attributable to the acquisition of the asset.

Subsequently, property, plant and equipment are measured at cost less accumulated depreciation and impairment losses for the Bank and it can be measured reliably.

Subsequent expenditure is recognized on the carrying amount of the item when it increases future economic benefit for the Bank and it can be measured reliably.

Expenditure on repairs and maintenance is recognized in profit or loss as an expense as incurred.

Depreciation is charged on a straight line basis over the estimated useful lives of property, plant and equipment and it is calculated on the asset's cost minus residual value.

The estimated useful lives are as follows:

- Buildings: up to 40 years.
- Additions to leased fixed assets and improvements: duration of the lease.
- Equipment and vehicles: 5 to 33 years.

Land is not depreciated but is tested for impairment.

The residual value of property and equipment and their useful lives are periodically reviewed and adjusted if necessary at each reporting date.

Property, plant and equipment are reviewed on an annual basis to determine whether there is an indication of impairment and if they are impaired the carrying amount is adjusted to its recoverable amount with the difference recorded in profit or loss.

In case of sale of property, plant and equipment as well as when no economic benefits are expected for the Bank, the fixed asset is derecognised. When selling the asset, the difference between the sale price and its carrying amount is recognized in profit or loss.

1.2.9 Investment property

The Bank includes in this category buildings or portions of buildings together with their respective portion of land that are held to earn rental income. The Bank has also included in this category right of use assets when the Bank is an intermediate lessor in an operating lease (the accounting policies applicable to those assets are presented in note 1.2.11).

Investment property is initially recognised at cost which includes any expenditure directly attributable to the acquisition of the asset.

Subsequently, investment property is measured at cost less accumulated depreciation and impairment losses.

Subsequent expenditure is recognized on the carrying amount of the item when it increases future economic benefit and can be measured reliably.

All costs for repairs and maintenance are recognized in profit or loss as incurred.

The estimated useful lives over which depreciation is calculated using the straight line method are the same as those applied to property, plant and equipment.

Transfers to and from the category of investment property are made when the property meets (or ceases to meet) the definition of investment property and there is evidence of change in its use. In particular, the property is reclassified in "Property, plant and equipment" if the Bank decides to use it while it is reclassified in the category of property held for sale if a decision is taken to sell it and if the criteria referred to in paragraph 1.2.16 are met. Conversely, property not classified as "Investment Property" is transferred to this category in case a decision for its lease is made.

In case of sale of investment property as well as when no economic benefits are expected for the Bank, the fixed asset is derecognised. When selling the asset, the difference between the sale price and its carrying amount is recognized in profit or loss.

1.2.10 Goodwill and other intangible assets

The Bank has included in this caption:

a) Intangible assets which are recognized from business combinations or which are individually acquired. These intangible assets include the value attributed to the acquired customer relationships and to deposit bases. Intangible assets arising from business combinations are initially measured at fair value while those individually acquired are initially measured at cost. Subsequently, they are depreciated, using the straight line method, during their useful life, which has been determined from 6 to 9 years, and are assessed for impairment when there are triggers for impairment.

b) Software, which is measured at cost less accumulated amortization and impairment losses. Expenditure incurred to maintain software programs is recognized in the income statement as incurred. Software that is considered to be an integral part of hardware (hardware cannot operate without the use of the specific software) is classified in property, plant and equipment.

More specifically, separately acquired software is initially measured at cost which comprises its purchase price and any directly attributable cost of preparing the software for its intended use, including employee benefits or professional fees. Software acquired as part of a business combination is initially measured at fair value. Both software separately acquired and acquired as part of a business combination is depreciated, using the straight line method, during its useful life which has been set from 2 to 15 years.

Regarding internally generated software, the Bank recognizes an intangible asset when it can demonstrate all of the following at the development phase:

- the technical feasibility of completing the intangible asset so that it will be available for use or sale;
- its intention to complete the intangible asset and use or sell it;
- its ability to use or sell the intangible asset;
- how the intangible asset will generate probable future economic benefits;

- the availability of adequate technical, financial and other resources to complete the development and to use or sell the intangible asset;
- its ability to measure reliably the expenditure attributable to the intangible asset during is development.

Expenditure incurred during the research phase is directly recognized in profit or loss.

Consequently, the cost of an internally generated intangible asset is the sum of expenditure incurred from the date when the intangible asset first meets the above criteria, including employee benefits arising from the generation of the software.

Internally generated software is depreciated during its useful life which has been set from 2 to 15 years.

All intangible assets are assessed for impairment when there are triggers for impairment (note 1.2.14).

No residual value is estimated for intangible assets.

In case of sale of an intangible asset as well as when no economic benefits are expected for the Bank, the intangible asset is derecognised. When selling the asset, the difference between the sale price and its carrying amount is recognized in profit or loss.

1.2.11 Leases

The Bank enters into leases either as a lessee or as a lessor. At inception, the Bank assesses whether a contract is or contains a lease. If the contract conveys the right to control the use of an identified asset for a period of time for consideration, then the contract is accounted as a lease.

The lease term is determined as the non-cancellable period of a lease, together with both periods covered by an option to extend the lease if the lessee is reasonably certain to exercise that option and periods covered by an option to terminate the lease if the lessee is reasonably certain not to exercise that option. After lease commencement, upon the occurrence of either a significant event or a significant change in circumstances that is within the control of the lessee, the Bank, as a lessee, reassesses the lease term. The Bank, either as a lessee or lessor, revises the lease term if there is a change in the non-cancellable period of a lease.

a) When the Bank is the lessor

When the risks and rewards incident to ownership of an asset are transferred to the lessee they are classified as finance leases.

All other lease agreements are classified as operating leases.

The accounting treatment followed depends on the classification of the lease, which is as follows:

i. Finance leases:

For finance leases where the Bank is the lessor the aggregate amount of lease payments is recognized as loans and advances.

The difference between the present value (net investment) of lease payments and the aggregate amount of lease payments is recognized as unearned finance income and is deducted from loans and advances.

The lease rentals received decrease the aggregate amount of lease payments and finance income is recognized on an accrual basis.

The finance lease receivables are subject to the same impairment testing as applied to customer loans and advances as described in note 1.2.12.

ii. Operating leases:

When the Bank is a lessor of assets under operating leases, the leased asset is recognized and depreciation is charged over its estimated useful life. Income arising from the leased asset is recognized as other income on an accrual basis.

b) When the Bank is the lessee

The Bank, as a lessee, for all leases recognizes a right of use asset and a lease liability at the commencement of the lease.

The right of use asset is initially measured at cost, comprising the initial lease liability amount, any initial direct costs and an estimate of the obligation for costs to refurbish the asset, less any lease incentives received.

Right-of use assets are subsequently measured at cost less any accumulated depreciation, any accumulated impairment losses and adjusted for any remeasurement of the lease liability.

Depreciation is charged on a straight line basis from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term. Right-of-use assets are reviewed at each reporting date to determine whether there is an indication of impairment and if they are impaired the carrying amount is adjusted to its recoverable amount with the difference recorded in profit or loss (note 1.2.14).

For short-term leases (lease term of 12 months or less at the commencement date) and leases for which the underlying asset is of low value (less than 5.000 EUR when new) the Bank does not recognize a right-of-use asset and a lease liability but instead recognizes the lease payments associated with those leases as an expense on a straight-line basis over the lease term.

The lease liability is initially measured at the present value of lease payments that are not paid at that date, net of cash lease incentives. Lease payments include fixed payments and variable payments that depend on an index (such as an inflation index) or a rate and are discounted using the lessee's incremental borrowing rate. Incremental borrowing rate is determined by using as reference rate Alpha Bank's secured funding rate, as well as its difference from Hellenic Republic government yield curves.

After the commencement date, the Bank measures the lease liability by increasing the carrying amount to reflect interest, reducing the carrying amount to reflect lease payments made and remeasuring the carrying amount to reflect any reassessment or lease modifications.

Right of use assets are included within Property, plant and equipment and the lease liability is included in Other liabilities. In cases where the Bank is an intermediate lessor in an operating lease, right of use assets recognized for the head lease are included within Investment property while in case the Bank is an intermediate lessor in a finance lease right of use asset, or the part of it which is subleased, is derecognized and a finance lease receivable is recognized.

1.2.12 Credit impairment losses on loans and advances to customers, undrawn loan commitments, letters of credit and letters of guarantee

The Bank, at each reporting date, recognizes a loss allowance for expected credit losses on loans and advances to customers not measured at fair value through profit or loss as well as for off-balance sheet exposures (letters of guarantee, letters of credit, undrawn loan commitments).

The loss allowance for loans and off-balance sheet exposures is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the financial asset falls under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized.

a) Default definition

The Bank has adopted as default definition non-performing exposures (NPE), as defined in the EBA Guidelines (GL/2016/07), thus harmonizing the definition of default used for financial reporting purposes with the one used for regulatory purposes.

It is noted that from 1.1.2021 default definition is amended as mentioned in note 40.1.

b) Classification of exposures into stages based on credit risk (Staging)

For the purposes of calculating expected credit losses, the exposures are classified into stages as follows:

- Stage 1: Stage 1 includes performing exposures that do not have significant increase in credit risk since initial recognition. Stage 1 also includes exposures for which credit risk has been improved and the exposure has been reclassified from stages 2 or 3. In this stage, expected credit losses are recognized based on the probability of default within the next twelve months.
- Stage 2: Stage 2 includes performing exposures for which there has been a significant increase in credit risk since initial recognition. Stage 2 also includes exposures for which credit risk has been improved and the exposure has been reclassified from stage 3. In this stage, lifetime expected credit losses are recognized.

- Stage 3: Stage 3 includes non performing/impaired exposures. In this stage, lifetime expected credit losses are recognized.

As an exception to the above, for purchased or originated credit impaired (POCI) exposures, lifetime expected credit losses are always recognized. Purchased or originated credit impaired exposures include:

- Exposures that at the time of acquisition meet the criteria to be classified as non- performing exposures.
- Exposures for which there has been a change in repayment terms, either due to financial difficulty or not, which resulted in derecognition and recognition of a new impaired asset (POCI) when derecognition is due to the change of debtor of a corporate loan in which case the creditworthiness of the new debtor is reassessed.

Especially for exposures affected by the Covid-19 crisis, and as long as suspension installment programs are effective, there are post model adjustments (PMAs) in order to reflect risks and other uncertainties that are not included in the underlying expected credit loss models, taking the following into account:

- The probability of default is the main indicator of the deterioration of an exposure since initial recognition.
- The probability of default models have not been designed to directly integrate current economic conditions.

c) Significant increase in credit risk

In determining significant increase in credit risk of an exposure since initial recognition and the recognition of lifetime expected credit losses instead of 12 months expected credit losses, the Bank assesses, at each reporting date, the risk of default compared to the risk of default at initial recognition for all its performing exposures including those with no delinquencies.

The assessment of the significant increase in credit risk is based on the following:

- Quantitative Indicators: refers to the quantitative information used and more specifically to the comparison of the probability of default (PD) between the reporting date and the date of initial recognition.
- Qualitative Indicators: refers to the qualitative information used which is not necessarily reflected in the probability of default, such as the classification of an exposure as forborne performing (FPL, according to EBA ITS). Additional qualitative indicators, both for corporate and retail portfolios are also reflected through the Early Warning indicators where depending on the underlying assessment, an exposure can be considered to have a significant increase in credit risk or not. Especially for special lending portfolio, additional qualitative indicators are captured through slotting category.
- Backstop Indicators: in addition to the above, and in order to capture cases for which there are no triggers reflecting the increase in credit risk, based on qualitative and quantitative indicators, the 30 days past due indicator is used as a backstop.

d) Calculation of expected credit loss

The measurement of expected credit losses is made as follows:

- For financial assets, a credit loss is the present value of the difference between:
  a. the contractual cash flows and
  b. the cash flows that the Bank expects to receive
- For undrawn loan commitments, a credit loss is the present value of the difference between:
  a. the contractual cash flows that are due if the holder of the loan commitment draws down the loan; and
  b. the cash flows that the Bank expects to receive if the loan is drawn down.

  For letters of guarantee and letters of credit, the loss is equal to the expected payments to reimburse the holder for a credit loss that it incurs less any amounts that the Bank expects to receive from the holder.

For present value calculation, original effective interest rate is used as a discount rate. Especially for POCI assets credit—adjusted effective interest rate is used.

The Bank calculates impairment losses either on a collective (collective assessment) or on an individual basis (individual assessment), taking into account the significance of an exposure or the borrower's limit. In addition, exposures that do not have common credit risk characteristics or for which there are no sufficient historical behavioral data are assessed on an individual basis.

The Bank calculates expected credit losses based on the weighted probability of three scenarios. More specifically, the

Economic Research Division produces forecasts for the possible evolution of macroeconomic variables that affect the level of expected credit losses of loan portfolios under a baseline and under alternative macroeconomic scenarios and also generates the cumulative probabilities associated with these scenarios.

The mechanism for calculating expected credit loss is based on the following credit risk parameters:

- **Probability of Default (PD):** It is an estimate of the probability of a debtor to default over a specific time horizon.
- **Exposure at default (EAD):** Exposure at Default is an estimate of the amount of the exposure at the time of the default taking into account: (a) expected changes in the exposure after the reporting date, including principal and interest payments; (b) the expected use of credit limits and (c) accrued interest. The approved credit limits that have not been fully disbursed represent a potential credit exposure and are converted into a credit exposure equal to the approved undrawn loan commitments multiplied by a Credit Conversion Factor (CCF). The Credit Conversion factor of credit exposure is calculated based on statistical models.
- **Loss given default (LGD):** Loss given default is an estimate of the loss that will occur if the default occurs at a given time. It is based on the difference between the contractual cash flows due and those expected to be received, including the liquidation of collaterals and cure rate.

e) Measurement of expected credit losses on receivables from customers

Receivables from customers are derived from the Bank's commercial, other than loan, activity. The loss allowance for receivables from customers is measured at an amount equal to the lifetime expected credit losses (there is no stage allocation) based on the simplified approach provided by IFRS 9.

f) Presentation of expected credit losses in financial statements

Loss allowances for expected credit losses are presented in the Balance Sheet as follows:

- Financial assets measured at amortised cost: loss allowance is presented as a deduction from the gross carrying amount of the assets.
- Financial assets measured at fair value through other comprehensive income: for those assets no loss allowance is recognized in the Balance Sheet, however, its amount is disclosed in the notes to the financial statements.
- Letters of credit/letters of guarantee: loss allowance is recognized in line "Provisions" of liabilities in Balance Sheet.
- Undrawn loan commitments: When there is not also a loan, loss allowance is recognized in line "Provisions" of liabilities in Balance Sheet. If a financial asset includes both a loan and an undrawn loan commitment, the accumulated expected credit losses of the loan commitment are presented together with the accumulated expected credit losses of the loan, as a deduction from its gross carrying amount. To the extent that the combined expected credit losses exceed the gross carrying amount of the loan, the expected credit losses are recognized in line "Provisions" of liabilities in Balance Sheet.

The amount of expected credit losses for the period is presented in the caption "Impairment losses and provisions to cover credit risk". In the same caption the following are also recognized: recoveries from written-off loans measured at amortised cost or at fair value through other comprehensive income, modification gains or losses of loans measured at amortised cost or at fair value through other comprehensive income and the favourable changes in expected credit losses of POCI assets in case expected credit losses are less than the amount of expected credit losses included in the estimated cash flows on initial recognition.

g) Write-offs

The Bank proceeds with the write-off of loans and advances to customers when it has no reasonable expectations for their recovery. In this case, the loss allowance is used against the carrying amount of the financial asset. Write-off is an event of derecognition.

1.2.13 Credit impairment losses on due from banks and bonds

The Bank, at each reporting date, recognizes a loss allowance for expected credit losses on due from banks and bonds not measured at fair value through profit or loss.

The loss allowance is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the financial asset falls under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized.

a) Default definition

Due from banks and bonds are considered impaired when the external rating of the issuer/counterparty is equivalent to default (D). In case there is no external rating, then the instrument is characterized as impaired based on internal rating. If there is also an exposure to the corporate issuer/counterparty to the loan portfolio which has been classified as impaired, the instrument is also characterized as impaired.

b) Classification of due from banks and bonds into stages based on credit risk (Staging)

For the purposes of calculating expected credit losses, the exposures are classified into stages as follows:

- Stage 1: Stage 1 includes non impaired instruments that do not have significant increase in credit risk since initial recognition. Stage 1 also includes instruments for which credit risk has been improved and the instrument has been reclassified from stages 2 or 3. In this stage, expected credit losses are recognized based on the probability of default within the next twelve months.
- Stage 2: Stage 2 includes non impaired instruments for which there has been a significant increase in credit risk since initial recognition. Stage 2 also includes instruments for which credit risk has been improved and the instrument has been reclassified from stage 3. In this stage, lifetime expected credit losses are recognized.
- Stage 3: Stage 3 includes impaired instruments. In this stage, lifetime expected credit losses are recognized.

As an exception to the above, for purchased or originated credit impaired (POCI) instruments, lifetime expected credit losses are always recognized. An instrument is characterized as purchased or originated credit impaired when:

- The instrument (or the issuer) has an external rating that corresponds to default at the time of acquisition
- Corporate bonds resulting from debt restructuring are classified as purchased or originated credit impaired, based on the guidelines applicable to the loan portfolio.

When a debt security has been purchased at a large discount and does not fall into any of the categories mentioned above, the Bank examines the transaction in detail (transaction price, recovery rate, issuer's financial condition at the time of purchase, etc.) in order to determine whether it should be recognised as purchased or originated credit-impaired (POCI). Classification in this category requires documentation and approval by the relevant committees of the Bank.

c) Significant increase in credit risk

The classification into stages for the purpose of expected credit loss measurement is based on the credit rating of rating agencies or, for corporate securities issued by Greek issuers for which there is also an exposure in loan portfolio, on the issuer's internal rating.

The Bank defines as low credit risk all investment grade securities, which are classified in Stage 1.

The determination of significant increase in credit risk for non-investment grade securities is based on the following two conditions:

- Downgrade in the issuer / counterparty's credit rating on the reporting dates compared to the credit rating on the date of the initial recognition.
- Increase in the probability of default of the issuer / counterparty for the 12-month period compared to the corresponding probability of default at initial recognition.

Additionally, the Bank monitors the change in the credit spread since initial recognition. A change in credit spread at the reporting date that exceeds a specific threshold compared to the credit margin prevailing at the date of initial recognition is a trigger for reviewing the securities classification stage.

d) Calculation of expected credit loss

The expected credit loss is the present value of the difference between:

a. the contractual cash flows and

b. the cash flows that the Bank expects to receive

For present value calculation, original effective interest rate is used as a discount rate. Especially for POCI assets credit-adjusted effective interest rate is used.

For the calculation of the expected credit loss, the following parameters are used:

- Probability of default (PD): the probability of default over the next 12 months is used to calculate the expected credit loss for 12 months, and the probability of default over the life of the instrument is used to calculate the lifetime expected credit losses.
- Exposure at default (EAD): In the case of securities, the Bank estimates the future unamortised cost in order to calculate the EAD. In particular, for each period, EAD is the maximum loss that would result from issuer / counterparty potential default.
- Loss given default (LGD) is the percentage of the total exposure that the Bank estimates as unlikely to recover at the time of the default. The Bank distinguishes sovereigns from non-sovereign issuers / counterparties as regards to the LGD estimation. In case the Bank has also granted a loan to the issuer / counterparty of the security, the estimated LGD is aligned to corresponding estimate for the loan portfolio (taking into account any potential collaterals the loan portfolio is likely to have against the unsecured debt securities).

e) Presentation of expected credit losses in financial statements

Loss allowances for expected credit losses are presented in the Balance Sheet as follows:

- Financial assets measured at amortised cost: loss allowance is presented as a deduction from the gross carrying amount of the assets.
- Financial assets measured at fair value through other comprehensive income: for those assets no loss allowance is recognized in the Balance Sheet, however, its amount is disclosed in the notes to the financial statements.

The amount of expected credit losses for the period is presented in the caption “Impairment losses and provisions to cover credit risk”. The caption includes also the favourable changes in expected credit losses of POCI assets in case expected credit losses are less than the amount of expected credit losses included in the estimated cash flows on initial recognition.

1.2.14 Impairment losses on investments and non-financial assets

The Bank assess as at each balance sheet date its investments in subsidiaries, associates and joint ventures as well as non-financial assets for impairment, particularly, right of use assets, goodwill and other intangible assets and at least annually property, plant and equipment and investment property

In assessing whether there is an indication that an asset may be impaired both external and internal sources of information are considered, of which the following are indicatively mentioned:

- The asset’s market value has declined significantly, more than would be expected as a result of the passage of time or normal use.
- Significant changes with an adverse effect have taken place during the period or will take place in the near future, in the technological, economic or legal environment in which the entity operates or in the market to which the asset is dedicated.
- Significant unfavorable changes in foreign exchange rates.
- Market interest rates or other rates of return of investments have increased during the period, and those increases are likely to affect the discount rate used in calculating an asset’s value in use.
- The carrying amount of the net assets of the entity is greater than its market capitalization.
- Evidence is available of obsolescence or physical damage of an asset.

Specifically for right of use assets, triggers for impairment include:

- The existence of leased properties that are neither used nor leased by the Bank.

- The fact that the present value of the leases received in the event of a sublease is lower than the value of the rents paid under the lease.

In addition, collection of dividends from subsidiaries, associates and joint ventures is considered as a possible impairment indicator when investments are tested for impairment at each reporting date.

An impairment loss is recognized in profit or loss when the recoverable amount of an asset is less than its carrying amount. The recoverable amount of an asset is the higher of its fair value less costs to sell and its value in use.

Fair value less costs to sell is the amount received from the sale of an asset (less the cost of disposal) in an orderly transaction between market participants.

Value in use is the present value of the future cash flows expected to be derived from an asset or cash –generating unit through their use and not from their disposal.

For the valuation of property, plant and equipment, the calculation of the recoverable amount includes all improvements which render the asset perfectly suitable for its use by the Bank. In this way, the market participant's ability to generate economic benefits by using the asset in it's highest and best use or by selling it to another market participant that would use the asset in its highest and best use is taken into account.

1.2.15 Income tax

Income tax consists of current and deferred tax.

Current tax for a period includes the expected amount of income tax payable in respect of the taxable profit for the current reporting period, based on the tax rates enacted at the balance sheet date.

Deferred tax is the tax that will be paid or for which relief will be obtained in future periods and it is calculated based on the temporary differences between the tax base of assets and liabilities and their respective carrying amounts in the financial statements.

Deferred tax assets and liabilities are calculated using the tax rates that are expected to apply when the temporary difference reverses, based on the tax rates (and laws) enacted at the balance sheet date.

A deferred tax asset is recognized to the extent that it is probable that future taxable profits will be available against which the asset can be utilized.

In addition, deferred tax assets are not recognized from the initial recognition of an asset or liability in a transaction that is not a business combination and at the time it takes place affects neither accounting profit nor taxable profit.

Furthermore, regarding investments in subsidiaries, branches, associates and joint ventures, deferred tax assets are recognized only when it is probable that the temporary difference will reverse in the foreseeable future and taxable profit will be available against which the temporary difference can be utilized.

Income tax, both current and deferred, is recognized in profit or loss except when it relates to items recognized directly in equity. In such cases, the respective income tax is also recognized in equity.

1.2.16 Non-current assets held for sale

Non-current assets or disposal groups that are expected to be recovered principally through a sale transaction, along with the related liabilities, are classified as held-for-sale.

The above classification is used if the asset is available for immediate sale in its present condition and its sale is highly probable. The sale is considered highly probable when it has been decided by the competent bodies of the Management, an active programme to locate a buyer has been initiated, the asset is actively marketed for sale at a price which is reasonable in relation to its current fair value, and the sale is expected to be completed within one year. Non-current assets that are acquired exclusively with a view to their subsequent disposal are classified as held for sale at the acquisition date when the one-year requirement is met and it is highly probable that the remaining criteria will be met within a short period following the acquisition (usually within three months).

Before their classification as held for sale, the assets are remeasured in accordance with the respective accounting standard.

Assets held for sale are initially recognised and subsequently remeasured at each balance sheet date at the lower of their carrying amount and fair value less cost to sell.

Any loss arising from the above measurement is recorded in profit or loss and can be reversed in the future. In this case, the gain from any subsequent increase in fair value less costs to sell cannot exceed the cumulative impairment losses that have been recognized. When the loss relates to a disposal group it is allocated to assets within the disposal group with the exception of specific assets that are not within the scope of IFRS 5. The impairment loss on a disposal group is first allocated to goodwill and then to the remaining assets and liabilities on a pro-rata basis.

Assets in this category are not depreciated.

Gains or losses from the sale of these assets are recognized in the income statement.

Non-current assets held for sale, that the Bank subsequently decides either to use or to lease, are reclassified to the categories of property, plant and equipment or investment property respectively. During their reclassification, they are measured at the lower of their recoverable amount and their carrying amount before they were classified as held for sale, adjusted for any depreciation, amortization or revaluation that would have been recognized had the assets not been classified as held for sale.

Non-current assets that the Bank intends to sell but are not available for immediate sale or are not expected to be sold within a year are included in Other Assets and are measured at the lower of cost (or carrying amount) and net realizable value in accordance with IAS 2. Net realizable value is considered equal to fair value less cost to sell.

1.2.17 Defined contribution and defined benefit plans

The Bank has both defined benefit and defined contribution plans.

A defined contribution plan is where the Bank pays fixed contributions into a separate entity and the Bank has no legal or constructive obligation to pay further contributions if the fund does not have sufficient assets to pay all employees the benefits relating to employee service in current or prior years. The contributions are recognized as employee benefit expense on an accrual basis. Prepaid contributions are recognized as an asset to the extent that a cash refund or a reduction in the future payments is available.

A defined benefit plan is a pension plan that defines an amount of pension benefit that an employee will receive on retirement which is dependent, among others, on years of service and salary on date of retirement and it is guaranteed by the Bank.

The defined benefit obligation is calculated, separately for each plan, based on an actuarial valuation performed by independent actuaries using the projected unit credit method.

The net liability recognized in the financial statements is the present value of the defined benefit obligation (which is the expected future payments required to settle the obligation resulting from employee service in the current and prior periods) less the fair value of plan assets. The amount determined by the above comparison may be negative, an asset. The amount of the asset recognised in the financial statements cannot exceed the total of the present value of any economic benefits available to the Bank in the form of refunds from the plan or reductions in future contributions to the plan.

The present value of the defined benefit obligation is calculated based on the return of high quality corporate bonds with a corresponding maturity to that of the obligation, or based on the return of government bonds in cases when there is no deep market in corporate bonds.

Interest on the net defined benefit liability (asset), which is recognised in profit or loss, is determined by multiplying the net defined benefit liability (asset) by the discount rate used to discount post-employment benefit obligation, as determined at the start of the annual reporting period, taking into account any changes in the net defined benefit liability (asset).

Service cost, which is also recognised in profit or loss, consists of:

- Current service cost, which is the increase in the present value of the defined benefit obligation resulting from employee service in the current period;
- Past service cost, which is the change in the present value of the defined benefit obligation for employee service in prior periods, resulting from the introduction or withdrawal of, or changes to, a defined benefit plan or a curtailment (a significant reduction by the entity in the number of employees covered by a plan) and
- Any gain or loss on settlement.

Before determining past service cost or a gain or loss on settlement, the Bank remeasures the net defined benefit liability (asset) using the current fair value of plan assets and current actuarial assumptions, reflecting the benefits offered under the plan before its amendment, curtailment or settlement.

Past service cost, in particular, is directly recognized to profit or loss at the earliest of the following dates:

- When the plan amendment or curtailment occurs; and
- When the Bank recognizes related restructuring costs (according to IAS 37) or termination benefits.

Likewise, the Bank recognises a gain or loss on the settlement when the settlement occurs.

Remeasurements of the net defined benefit liability (asset) which comprise:

- actuarial gains and losses;
- return on plan assets, excluding amounts included in net interest on the net defined benefit liability (asset); and
- any change in the effect of the limitation in the asset recognition, excluding amounts included in net interest on the net defined benefit liability (asset),

are recognized directly in other comprehensive income and are not reclassified in profit or loss in a subsequent period.

Finally, when the Bank decides to terminate the employment before retirement or the employee accepts the Bank's offer of benefits in exchange for termination of employment, the liability and the relative expense for termination benefits are recognized at the earlier of the following dates:

- when the Bank can no longer withdraw the offer of those benefits; and
- when the Bank recognizes restructuring costs which involve the payment of termination benefits.

1.2.18 Share options granted to employees

The granting of share options to the employees, their exact number, the price and the exercise date are decided by the Board of Directors in accordance with Shareholders' Meeting approvals and after taking into account the current legal framework.

The fair value calculated at grant date is recognized during the servicing period and recorded in staff costs with an increase of a reserve in equity respectively. When there are no vesting conditions, it is considered that services have been received. On the contrary, when there are service vesting conditions the expense is recognized as the relative services are received. When the Bank grants the share options to the employees of the Group companies, instead of debiting staff costs, the Bank debits the acquisition cost of its interest in the subsidiary (or the intermediate subsidiary in case the employees offer their services to a subsidiary in which the Bank has an indirect interest). The amount paid by the beneficiaries of share options on the exercise date increases the share capital of the Bank and the reserve in equity from the previously recognized fair value of the exercised options is transferred to share premium. The reserve in equity from the previously recognized fair value of the unexercised options is transferred to retained earnings.

1.2.19 Provisions and contingent liabilities

A provision is recognized if, as a result of a past event, the Bank has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation.

Provisions are, also, recognized in cases of restructuring plans with which management attempts either to change the subject of a corporate activity or the manner in which it is conducted (e.g. close down business locations). The recognition of provision is accompanied with the relevant, authorized by the Management, program and with the suitable actions of disclosure. A restructuring provision includes only the direct expenditures arising from the restructuring, which are those that are both necessarily entailed by the restructurings and not associated with the ongoing activity of the Bank

The amount recognized as a provision shall be the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. Where the effect of the time value of money is material, the amount of the provision is equal to the present value of the expenditures expected to settle the obligation.

Amounts paid for the settlement of an obligation are set against the original provisions for these obligations. Provisions are reviewed at the end of each reporting period. If it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed. Additionally, provisions are not recognized for future operating losses.

Future events that may affect the amount required to settle the obligation, for which a provision has been recognized, are taken into account when sufficient objective evidence exists that they will occur.

Reimbursements from third parties relating to a portion of or all of the estimated cash outflow are recognized as assets, only when it is virtually certain that they will be received. The amount recognized for the reimbursement does exceed the amount of the provision. The expense recognized in profit or loss relating to the provision is presented net of the amount of the reimbursement.

The Bank does not recognize in the statement of financial position contingent liabilities which relate to:

- possible obligations resulting from past events whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Bank, or
- present obligations resulting from past events for which:
  - it is not probable that an outflow of resources will be required, or
  - the amount of liability cannot be measured reliably.

The Bank provides disclosures for contingent liabilities taking into consideration their materiality.

1.2.20 Securities sale and repurchase agreements and securities lending

The Bank enters into purchases of securities under agreements to resell at a certain date in the future at a fixed price (reverse repos). Securities purchased subject to commitments to resell them at future dates are not recognized in the balance sheet.

The amounts paid, including interest accruals, are recognized in loans and advances to either banks or customers. The difference between the purchase price and the resale price is recognized as interest income using effective interest method.

Similarly, securities that are sold under agreements to repurchase (repos) are not derecognized but they continue to be measured in accordance with the accounting policy of the category that they have been classified.

The proceeds from the sale of the securities are reported as liabilities to either banks or customers. The difference between the sales price and the repurchase price is recognized as interest expense using effective interest method.

Securities borrowed by the Bank under securities lending agreements are not recognized in the balance sheet except when they have been sold to third parties whereby the liability to deliver the security is recognized and measured at fair value.

1.2.21 Securitization

The Bank securitises financial assets, by transferring these assets to special purpose entities, which in turn issue bonds.

In each securitization of financial assets the Bank considers the contractual terms and the economic substance of transactions, in order to decide whether the Bank should proceed with the derecognition of the securitized assets, as referred in note 1.2.4.

1.2.22 Equity

Distinction between debt and equity

Financial instruments issued by the Bank to obtain funding are classified as equity when, based on the substance of the transaction, the Bank does not undertake a contractual obligation to deliver cash or another financial asset or to exchange financial instruments under conditions that are potentially unfavorable to the issuer.

In cases when the Bank is required to issue equity instruments in exchange for the funding obtained, the number of equity instruments must be fixed and determined on the initial contract, in order for the obligation to be classified as equity.

Incremental costs of share capital increase

Incremental costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from retained earnings.

Share premium

Share premium includes the difference between the nominal value of the shares and the cost consideration received in the case of a share capital increase.

It also includes the difference between the nominal value of the shares issued and their market value, in cases of exchanges of shares as consideration for the acquisition of a business by the Bank.

Treasury shares

The cost of acquiring treasury shares is recognized as a reduction of equity. Subsequent gains or losses from the sale of treasury shares, after deducting all direct costs and taxes, are recognized directly in retained earnings.

Dividends

Dividends are deducted from retained earnings and recorded as a liability in the period that the dividend is approved by the Shareholders' General Meeting.

1.2.23 Interest income and expense

Interest income and expense is recognized in the income statement for all interest bearing financial assets and liabilities.

Interest income and expense is recognised on an accrual basis and measured using the effective interest method with the exception of derivatives as described in detail in note 1.2.5. Especially for POCI assets, interest income is calculated using credit-adjusted effective interest rate.

Effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial asset or financial liability to the gross carrying amount of a financial asset or to the amortised cost of a financial liability. When calculating the effective interest rate, the Bank estimates the expected cash flows by considering all the contractual terms of the financial instrument but does not consider the expected credit losses. The calculation includes all fees and points paid or received between parties to the contract that are an integral part of the effective interest rate.

For financial assets, in particular, the following apply:

- For those financial assets classified within Stage 1 or Stage 2 for the purpose of expected credit losses measurement, interest income is calculated by applying effective interest rate to the gross carrying amount of the asset.
- For those financial assets classified within Stage 3 for the purpose of expected credit losses measurement, interest income is calculated by applying the effective interest rate to the amortised cost of the asset.
- For purchased or originated credit impaired financial assets interest income is calculated by applying the credit-adjusted effective interest rate to the amortised cost of the asset.

In case of negative interest rates, interest is presented within interest income for interest bearing financial liabilities and within interest expense for interest bearing financial assets.

Borrowing costs that are directly attributable to assets that require a substantial period of time to get ready for their intended use or sale are capitalized as part of the cost of the asset. Capitalisation ceases when substantially all the activities necessary to prepare the asset for its intended use are complete.

1.2.24 Fee and commission income

Fees and commission income from contracts with customers are recognized based on the consideration specified in the contract when the Bank satisfies the performance obligation by transferring the service to the customer. With the exception of specific portfolio management fees which are calculated on the basis of the size and performance of the portfolio, the services provided have a fixed price. Variable portfolio management fees are recognized when all related uncertainties are resolved.

For commissions on services provided over time, revenue is recognized as the service is being provided to the customer, such as commissions to provide account management services, fees for administration of syndicated loans, fees for portfolio management and investment services advice.

For transaction-based fees, the execution and completion of the transaction executed signals the point in time, in which the service is transferred to the customer and the revenue is recognized, such as currency transactions, purchases / sales of securities as well as issue and disposal of syndicated loans and bonds.

Transaction revenues relating to the recognition of a financial instrument not measured at fair value through profit or loss are capitalized and amortised in the income statement using the effective interest method over the life of the financial instrument and included in interest income.

1.2.25 Gains less losses on financial transactions

Gains less losses on financial transactions include:

- fair value changes of financial assets and liabilities,
- gains and losses arising from the modification of the contractual terms of financial assets measured at fair value through profit or loss,
- gains and losses arising from the derecognition of financial assets and liabilities due to early repayment, including conversion of loans into shares, disposal or significant modification of the contractual terms, except for gains and losses arising from the derecognition of financial assets measured at amortised cost which are recognized in a separate line item of the Income Statement,
- gains and losses arising from the impairment or disposal of Bank's investments in subsidiaries, associates and joint ventures,
- exchange differences arising from the translation of financial instruments denominated in foreign currencies.

1.2.26 Gains less losses on derecognition of financial assets measured at amortised cost

Gains less losses on derecognition of financial assets measured at amortised cost include:

- Gains and losses from the derecognition of financial assets measured at amortised cost
- The difference, at initial recognition, between the nominal and the fair value of a financial asset measured at amortised cost that is the result of the derecognition of another financial asset due to significant modification of its contractual terms.

1.2.27 Discontinued operations

A discontinued operation is a component of the Bank that either has been disposed of, or has been classified as held for sale and represents:

- a major line of the Bank's business; or
- a geographical area of operations.

The assets and liabilities of discontinued operations are presented separately from other assets and liabilities in the balance sheet and are not offset.

Any cumulative income or expense recognized directly in equity relating to a discontinued operation is presented separately (as a separate line in equity).

The post tax profit or loss from discontinued operations and any losses recognized on the measurement to fair value less costs to sell of the disposal group are presented in a separate line in the face of the income statement after net profit from continuing operations. The comparative financial statements are restated only for the income statement and the cash flow statement.

1.2.28 Related parties definition

According to IAS 24, a related party is a person or entity that is related to the entity that is preparing its financial statements. For the Bank, in particular, related parties are considered:

a. An entity that constitutes for the Bank:
   i) a subsidiary,
   ii) a joint venture and
   iii) an associate
b. A person or an entity that have control, or joint control, or significant influence over the Bank.
   This category includes Hellenic Financial Stability Fund and its subsidiaries, because, in the context of the L.3864/2010, the

HFSF participates in the Board of Directors and in significant committees of the Bank and as a result is considered to have significant influence over it.

c. A person and his close family members, if that person is a member of the key management personnel.

The Bank considers as key management personnel all the members of the Bank's Board of Directors and of the Bank's Executive Committee while as their close family members it considers their children and spouses or domestic partners and their dependents and the dependents of their spouses or domestic partners.

Related parties are also considered the entities controlled or jointly controlled by the above mentioned persons and more specifically the entities in which the above persons participate with more than 20%.

1.2.29 Comparatives

To the extent considered necessary the comparatives have been adjusted to facilitate changes in presentation of the current year amounts.

1.3 Significant accounting judgments and key sources of estimation uncertainty

Significant accounting judgments

The Bank, in the context of applying accounting policies, makes judgments that may affect the amounts recognized in the financial statements. Those judgements relate to the following:

Assessment of whether contractual cash flows of a debt financial instrument represent solely payments of principal and interest on the principal amount outstanding (SPPI) (note 1.2.4)

The Bank, at initial recognition of a debt financial asset, assesses whether cash flows are solely payments of principal and interest on the principal amount outstanding. The assessment requires judgement mainly on:

- Whether contractual terms that affect the performance of the instrument relate solely to credit risk, other basic lending risks and profit margin.
- For loans in special purpose entities, whether there is a non-recourse feature. The assessment is based on specific index thresholds as well as on the evaluation of the adequacy of equity and of the collaterals that are not related to the asset being financed.
- Whether in case of prepayment or extension the compensation received is considered fair.

Significant judgements relating to the selection of methodologies and models for expected credit losses calculation (note 40.1)

The Bank, in the context of the application of its accounting policies for the measurement of the expected credit losses makes judgments in order to identify:

- the criteria that indicate a significant increase in credit risk,
- the choice of appropriate methodologies for expected credit loss calculation (expected credit loss calculation on an individual or on a collective basis),
- the choice and development of appropriate models used to calculate the exposure at default by financial instrument category (EAD), the probability of default (PD), the estimated expected credit loss at the time of default (LGD), the probability of forbearance (PF) and the choice of appropriate parameters and economic forecasts used in them,
- the choice of the parameters of the macroeconomic forecasts used in the models to determine the expected life and the date of initial recognition of revolving exposures,
- the grouping of financial assets based on similar credit risk characteristics.

Applying different judgments could significantly affect the number of financial instruments classified in stage 2 or significantly differentiate expected credit loss.

Significant judgements regarding moratoria and state guarantee in the context of the pandemic Covid-19 (note 40.1)

The Bank applied below accounting treatment for moratoria in the context of pandemic and state guarantee:

- Moratoria were treated as modifications of current contractual terms and they did not lead to the derecognition of initial loans.
- Moratoria were not automatically considered as forbearances or that they lead to default.
- Lifetime expected credit losses were calculated for current retail credit exposures which were subject to payment suspension programs and which were classified in high credit risk areas since they were classified within stage 2, as a result of a relative quality assessment for credit risk increase.
- Temporary short-term facilities related to retail credit exposures which came out from payment suspension programs and which, according to the individual assessment carried out, concerned viable customers who were experiencing a temporary liquidity problem, with no signs of permanent financial difficulty, were classified within stage 2 and lifetime expected credit losses were calculated.
- The cure rate for customers that were already under modification terms was not changed for as long as the moratoria are effective.
- State guarantee was considered an integral part of the loan contract and was taken into account for the expected credit loss calculation of loans.

Income Tax (notes 13 and 38)

The recognition of assets and liabilities for current and deferred tax is affected by factors such as the practical implementation of the relevant legislation and the settlement of disputes that might exist with tax authorities etc. Future tax audits and changes in tax legislation may result in the adjustment of the amount of assets and liabilities for current and deferred tax and in tax payments other than those recognized in the financial statements of the Bank.

Classification of non-current assets held for sale (note 44, 48)

The Bank classifies non-current assets or disposal groups that are expected to be recovered principally through a sale transaction, along with the related liabilities, as held-for-sale when the asset is available for immediate sale in its present condition and its sale is highly probable to be completed within one year. The assessment of whether the above criteria are met requires judgment mainly as to whether the sale is likely to be completed within one year from the reporting date. In the context of this assessment, the Bank takes into account the receipt of the required approvals (both regulatory and those given by the General Meeting and the Committees of the Bank), the receipt of offers (binding or note) and the singing of agreements as well as of any conditions included in them.

Based on the above, with a reference date as at 31.12.2020, the possibility of classifying the loans securitized under Galaxy transaction (note 48) as held for sale was assessed. However, taking into account that the completion of the sale of bonds issued under the securitization requires the fulfillment of certain conditions, it was assessed that the completion of the sale within one year cannot be considered certain and therefore these loans were not classified as held for sale. The main pending conditions to be met for the completion of the bond sale transaction that will lead to the derecognition of the loans are the following:

- Approval for the Hive Down by the General Meeting of shareholders of the Bank;
- Approval for the Hive Down by the Single Supervisory Mechanism (SSM) and granting thereby of a new banking license for the Good Bank;
- Approval for the acquisition by a new investor of a qualifying holding in Cepal by Bank of Greece; The acquisition of Cepal from a third investor is part of the strategic plan of the Bank, as mentioned in note 48, as it will take over the servicing of the loan portfolio;
- Approval or clearance by the competent Competition Commission of the acquisition by a new investor of a qualifying holding in Cepal;
- Issuance by Ministry of Development of ministerial decision for the granting by the Hellenic Republic of its guarantee for the Senior notes of the securitization transaction under the “Hercules Program”. A minimum rating of the Senior notes as BB-

has been determined as a prerequisite for the receipt of the guarantee;

- Receipt of Single Supervisory Mechanism (SSM) confirmation that the completion of the transaction will result to the Significant Risk Transfer (SRT) in relation to the NPE Portfolios.

At each reporting date, the Bank will re-evaluate the degree of fulfillment of the above conditions in order to decide the classification of loans securitized under Galaxy transaction.

Key sources of estimation uncertainty

Key sources of estimation uncertainty used by the Bank in the context of applying its accounting principles and which have a significant impact on the amounts recognized in the financial statements are presented below:

Fair value of assets and liabilities (notes 22, 23, 26, 40.4, 44)

For assets and liabilities traded in active markets, the determination of their fair value is based on quoted, market prices. In all other cases the determination of fair value is based on valuation techniques that use observable market data to the greatest extent possible. In cases where there is no observable market data, the fair value is determined using data that are based on internal estimates and assumptions i.e. determination of expected cash flows, discount rates, prepayment probabilities or potential counterparty default.

Estimates included in the calculation of expected credit losses (note 40.1)

The measurement of expected credit losses requires the use of complex models and significant estimates of future economic conditions and credit behavior, taking into account the events that have occurred until reporting date. The significant estimates relate to:

- the determination of the alternative macroeconomic scenarios and the cumulative probabilities associated with these scenarios,
- the probability of default during a specific time period based on historical data, the assumptions and estimates for the future,
- the probability of forbearance for retail portfolios,
- the determination of the expected cash flows and the flows from the liquidation of collaterals,
- the determination of the adjustments to the expected credit loss models and
- the integration of loan portfolio sales scenarios taking into account on the one hand any factors that may hinder the realization of the sale and on the other hand the level of satisfaction of the conditions for the completion of the sale.

In this context, for the calculation of the expected credit losses of securitized loans of Galaxy transaction, expected flows from the sale were not taken into account since, as mentioned above, there are several conditions that must be met in order to complete the sale of the bonds issued under the loans securitization, which on the one hand create a significant uncertainty as to the completion of the transaction and on the other hand do not create a reasonable base for the calculation of the probability of the sale completion.

It is also noted that due to the pandemic Covid-19:

- In order to assess the impact of the pandemic on borrower's cash flows, adjustments have been applied for expected losses for exposures that are individually assessed depending on the business sector of the borrower.
- Due to delays expected to the liquidation of collaterals, the assumed time of repossession of collaterals increased by one year, as compared to 31.12.2019, for both exposures that are assessed collectively and for those that are assessed individually and for which the recovery is not based on cash flows from operating activity (gone concern).

Impairment losses on investments in subsidiaries, associates and joint ventures and on non - financial assets (notes 21, 22 and 23)

The Bank, at each reporting date, assesses for impairment non – financial assets, and in particular, right-of-use assets, goodwill and other intangible assets, as well as its investments in subsidiaries, associates and joint ventures and at least on an annual basis property, plant and equipment and investment property. Internal estimates are used to a significant degree to determine the recoverable amount of the assets, i.e. the higher between the fair value less costs to sell and value in use.

Employee defined benefit obligations (note 31)

Defined benefit obligations are estimated based on actuarial valuations, which are mainly conducted on an annual basis, that incorporate assumptions regarding discount rates, future changes in salaries and pensions, as well as the return on any plan assets. Any change in these assumptions will affect the amount of obligations recognized.

Provisions (note 33)

The amounts recognized by the Bank in its financial statements as provisions are derived from the best estimate of the outflow required to settle the present obligation. This estimate is determined by Management after taking into account experience from relevant transactions and in some cases expert reports. In case the amount recognized as a provision is affected by a variety of factors, its calculation is based on the weighting of all possible results. At each balance sheet date, provisions are revised to reflect current best estimates of the obligation.

Recoverability of deferred tax assets (notes 13 and 25)

The Bank recognizes deferred tax assets to the extent that it is probable that it will have sufficient future taxable profit available, against which, deductible temporary differences and tax losses carried forward can be utilized. The estimation of future taxable profits is based on forecasts for the development of the accounting results, as these are formulated in accordance with the business plan of the Group. In particular, the business plan includes actions aimed at enhancing profitability through:

- the reduction of the amount of non-performing exposures, based on the plan submitted to the Single Supervisory Mechanism (SSM),
- further reduction of operating costs,
- interest income increase through targeted financing of business segments,
- increase in commission income from services and products offered to individuals and corporates and
- the active management of the sources and the financing costs of the Group.

The main categories of deferred tax assets which have been recognized by the Bank relate to losses from the Greek government bonds exchange program (PSI) and the December 2012 Greek government bond buyback program and to deductible temporary differences arising from loans' impairment.

Deferred tax assets associated with tax losses incurred by the PSI and the participation of the Bank in the December 2012 Greek government bond buyback program were recognized as a "debit difference" according to Law 4046/14.2.2012, Law 4110/23.1.2013 and a respective legal opinion. According to Law 4110/23.1.2013 the "debit difference" is deductible for tax purposes, gradually in equal installments, within 30 years, a fact which, according to the Bank's estimation, provides a sufficient time period for its gradual utilization against taxable profits.

Regarding the temporary differences arising from loans' impairment, there are no time constraints concerning their recovery, as is the case for the other deferred tax assets categories. The Bank assessed their recoverability based on estimates for future taxable profits, as these are forecasted on the basis of the aforementioned business plan. In order to assess deferred tax asset recoverability, the Group's business plan was extended for a limited number of years.

In addition, tax losses resulting from the write-down of debts and the sale of loans, as specifically mentioned in note 13, are recognized as a debit difference. In this context, during the period a significant amount of this kind of debit difference was recognized due to the securitization of loans under Galaxy transaction. It is noted that the debit difference is recognized gradually and equally over a period of 20 years, a fact which in accordance with Bank's estimations provides sufficient time for offsetting against taxable profits.

The Bank, based on the above, estimates that the total deferred tax assets recognized and that relate to temporary differences and to tax losses carried forward is recoverable.

In addition, and regardless of the assessment of the recoverability of deferred tax assets that is carried out based on what is mentioned above, Law 4303/2014 provides that in case that the after tax accounting result for the period is a loss, deferred tax assets arising from the PSI debit difference and from the accumulated provisions and other general losses due to credit risk are eligible to be converted into a final and settled claim against the Greek State, as described in detail in note 13.

The main uncertainties concerning the estimations for the recoverability of the deferred tax assets relate to the achievement of the goals set in the Group's business plan, which is affected by the general macroeconomic environment in Greece and internationally. These goals mainly concern the reduction of non-performing exposures, the production of new loans as well as the evolution of operating results. At each balance sheet date, the Bank reassesses its estimation regarding the recoverability of deferred tax assets in conjunction with the development of the factors that affect it.

The estimates and judgments applied by the Bank in making decisions and in preparing the financial statements are based on historical information and assumptions which at present are considered appropriate. The estimates and judgments are reviewed on an ongoing basis in order to take into account current conditions, and the effect of any changes is recognized in the period in which the estimates are revised.

INCOME STATEMENT

2. Net interest income

	From 1 January to	
	31.12.2020	31.12.2019*
Interest and similar income		
Due from banks	2,172	3,688
Loans and advances to customers measured at amortized cost	1,351,024	1,436,101
Loans and advances to customers measured at fair value through profit or loss	12,974	14,024
Trading securities (note 17)	177	270
Investment securities measured at amortized cost (note 20c)	39,076	3,972
Investment securities measured at fair value through other comprehensive income (note 20a)	73,218	126,817
Investment securities measured at fair value through profit or loss (note 20b)	954	819
Derivative financial instruments	202,557	187,299
Finance lease receivables (note 19)	258	282
Negative interest from interest bearing liabilities	123,284	51,537
Other	722	442
Total	**1,806,416**	**1,825,251**
Interest expense and similar charges		
Due to banks	(20,460)	(50,954)
Due to customers	(82,947)	(140,350)
Debt securities in issue and other borrowed funds	(38,017)	(25,523)
Derivative financial instruments	(198,183)	(200,041)
Lease liabilities (note 32)	(3,761)	(4,300)
Negative interest from interest bearing assets	(89,895)	(35,329)
Other	(67,781)	(72,264)
Total	**(501,044)**	**(528,761)**
Net interest income	**1,305,372**	**1,296,490**

During 2020, net interest income increased compared to 2019, mainly due to the reduced cost on due to customers as a result of repricing of deposits, as well as on due to banks as a result of the substitution of interbank repos agreements from the Eurosystem at negative interest rates, leading to the conversion of the relevant interest expense to interest income. The aforementioned increase was partially offset by the reduction of interest income from loans and from the bonds portfolio mainly due to the reduction of interest rates of loan portfolio and the transactions carried out on the bonds portfolio during the year.

The following table presents the amounts of interest income and interest expense calculated using the effective interest rate method, by financial asset measurement category:

	From 1 January to	
	31.12.2020	31.12.2019*
Financial assets measured at amortised cost	1,375,005	1,388,369
Financial assets measured at fair value through other comprehensive income	73,218	126,817
Financial assets measured at fair value through profit or loss	14,105	15,113
Total	**1,462,328**	**1,530,299**
Financial liabilities measured at amortised cost	(154,133)	(219,437)

* Certain figures of the previous year have been restated as described in note 47.

400 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

3. Net fee and commission income and other income

Net fee and commission income

	From 1 January to	
	31.12.2020	31.12.2019
Loans	39,171	43,236
Letters of guarantee	42,473	43,665
Imports-exports	5,457	8,052
Credit cards	67,100	66,943
Transactions	29,815	32,159
Mutual funds	32,253	29,028
Advisory fees and securities transaction fees	2,238	2,705
Brokerage services	154	326
Foreign exchange fees	16,441	17,809
Insurance brokerage	18,756	17,448
Other	27,016	27,550
Total	**280,874**	**288,921**

Net fee and commission income decreased compared to 2019, mainly due to lower fees and commissions from loans as well as the lower volume of transactions, imports-exports and letters of guarantee as a result of lower volumes due to COVID-19. The aforementioned decrease on net fee and commission income was partially offset by the increase in commission income from mutual funds due to increased volume of transactions.

Commission income from loans, for the year 2020, includes an amount of € 38,991 (31.12.2019: € 43,218) which relates to loans and advances to customers that are measured at amortized cost.

Fee and commissions and other income

The table below presents, per operating segment, the income from contracts, that fall within the scope of IFRS 15:

	From 1 January to 31.12.2020					
	Retail Banking	Corporate Banking	Asset Management/ Insurance	Investment Banking/ Treasury	Other / Elimination Center	Total
Fee and commission income						
Loans	7,355	24,928		6,888		39,171
Letters of guarantee	2,161	38,768	1	1,543		42,473
Imports-exports	1,191	4,265		1		5,457
Credit cards	79,840	29,096		208		109,144
Transactions	19,759	8,780	65	1,211		29,815
Mutual funds			32,253			32,253
Advisory fees and securities transaction fees		550	92	1,596		2,238
Brokerage services				154		154
Foreign exchange fees	11,406	4,023	30	982		16,441
Insurance brokerage	18.756					18.756
Other	5.450	3.582	7.676	12.748		29.456
Total	**145,918**	**113,992**	**40,117**	**25,331**	**-**	**325,358**
Other income						
Gains from disposal of fixed assets					2,403	2,403
Other	3,110	137	50	953	7,752	12,002
Total	**3,110**	**137**	**50**	**953**	**10,155**	**14,405**

401 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	From 1 January to 31.12.2019					
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	Other / Elimination Center	Total
Fee and commission income						
Loans	8,029	27,004	227	7,976		43,236
Letters of guarantee	2,017	40,744	2	902		43,665
Imports-exports	1,831	6,213		8		8,052
Credit cards	99,382	46,258	5	141		145,786
Transactions	20,149	10,917	63	1,030		32,159
Mutual funds			29,028			29,028
Advisory fees and securities transaction fees		1,419	257	1,029		2,705
Brokerage services				326		326
Foreign exchange fees	11,864	4,873	31	1,041		17,809
Insurance brokerage	17,448					17,448
Other	12,751	8,904	6,851	1,089		29,595
Total	**173,471**	**146,332**	**36,464**	**13,542**	**-**	**369,809**
Other income						
Gains from disposal of fixed assets					2,175	2,175
Other	2,784	162	71	2,952	3,829	9,798
Total	**2,784**	**162**	**71**	**2,952**	**6,004**	**11,973**

"Other income" line of the Income Statement includes additionally income, such as operating lease income and income from insurance indemnities, which are not presented in the above table since they do not fall within the scope of IFRS 15 (note 7).

4. Dividend income

	From 1 January to	
	31.12.2020	31.12.2019
Equity securities of investment portfolio measured at fair value through other comprehensive income (note 20)	1,834	417
Equity securities of trading portfolio	8	9
Equity securities of investment portfolio measured at fair value through profit or loss	263	91
Subsidiaries and associates	8,621	23,243
Total	**10,726**	**23,760**

Dividend income of year 2020, is mainly attributed to € 3,275 by Alpha Asset Management AEDAK, € 600 by Alpha Insurance Agents S.A., € 1,906 by Alpha Real Estate Management and Investments S.A. and € 2,840 by Alpha Group Ltd.

Dividend income of year 2019, is mainly attributed to € 3,099 by Alpha Asset Management AEDAK, € 7,994 by Alphalife A.A.E.A.Z, € 1,000 by Alpha Insurance Agents S.A., € 1,150 by Alpha Real Estate Management and Investments S.A. and € 10,000 by ABC Factors S.A.

The amounts are presented in thousands of Euro unless otherwise indicated

5. Gains less losses on financial transactions

	From 1 January to	
	31.12.2020	31.12.2019*
Foreign exchange differences	25,102	33,337
Trading securities:		
- Bonds	1,955	3,378
- Equity securities	(202)	177
Financial assets measured at fair value through profit or loss		
- Loan and advances to customers	(18,382)	(31,237)
- Equity securities	60,865	29
- Other securities	(14,712)	10,947
- Bonds	(11,028)	3,860
Financial assets measured at fair value through other comprehensive income		
- Bonds	430,387	339,779
Investments in subsidiaries, associates and joint ventures	(56,351)	(83,870)
Derivative financial instruments	(5,494)	42,548
Other financial instruments	(1,422)	3,608
Total	**410,718**	**322,556**

"Gains less losses on financial transactions" for the year 2020 has been mainly affected by:

- Gains amounting to € 430,387 reported in the "Bonds" of financial assets measured at fair value through other comprehensive relating to gains from sales of Greek Government bonds and treasury bills amounting to € 435,121 and other corporate bonds amounting to € 1,189 as well as losses from sales of government bonds amounting to € 5,923.
- Losses amounting to € 8,781 reported in "Derivative financial instruments" that concern the Credit Valuation Adjustment on transactions with the Greek State.
- Losses amounting to € 18,382 reported in "Loans and advances to customers" measured at fair value through profit or loss due to valuation adjustments within the year.
- Gains amounting to € 60,865 reported in "Equity securities" measured at fair value through profit or loss and mainly related to a gain of € 42,250 deriving from the Open Sale and Conversion Program announced by Mastercard in September 2020 and by which Class B shareholders were provided the right to convert their shares on new issued Class A shares. In particular, on 20.10.2020, the Bank exercised the conversion right for all its Class B shares and on 10.11.2020 the conversion of Class B shares to Class A shares took place. The new shares were measured at fair value at the date of conversion and classified under the financial assets at fair value through profit or loss. From the recognition of the shares at fair value, an amount of € 43,706 gain was recognized. On 11.11.2020, the sale of the abovementioned Class A shares of the Bank to the New York Stock Exchange was completed. On the date of sale, the shares were derecognized and a loss amount of € 1,456 was recognized.

  In addition, a gain of € 18,360 reported in Equity securities measured at fair value through profit or loss relates to the recognition of new preferred shares of VISA Inc Preferred A following the release of part of the value of the existing Class C shares under the Release Process performed on 24.9.2020. Preferred Class A shares may be converted into ordinary in order to be sold.
- Losses amounting to € 14,024 reported in "Other Securities" measured at fair value through profit or loss related to the change in the fair value of Class C VISA Inc preferred securities, which resulted mainly due to the change of their conversion rate to ordinary shares in the context of the Release Process performed on 24.9.2020. The Class C securities were reclassified retrospectively from 1.1.2019 in category "securities measured at fair value through profit or loss" from the category "securities measured at fair value through other comprehensive income", as detailed described in note 47. As a result of the above, the Bank recognized in gains less losses on financial transactions of the year 2019 a gain of € 8,961 reported in "other securities" measured at fair value through profit or loss.

* Certain figures of the previous year have been restated as described in note 47.

403 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

- In addition, within caption "Investments in subsidiaries, associates and joint ventures", are included mainly impairments and result from the sale of subsidiaries, associates and joint ventures as detailed described in notes 21 and 44.

"Gains less losses on financial transactions" for the year 2019 has been mainly affected by:

- Gains amounting to € 339,779 reported in the "Bonds" of financial assets measured at fair value through other comprehensive income that relates to gains from the sales of Greek Government Bonds and Greek T-bills of € 323,979 and other corporate and government bonds amounting to € 15,800
- Loss amounting to € 31,237 of loans and advances to customers measured at fair value through profit or loss due to valuation adjustments of the year
- Additionally, the caption "Investments in subsidiaries, associates and joint ventures" includes mainly impairment losses on subsidiaries, joint ventures and subsidiaries for sale as well as gains from the disposal of the associate company Alpha Investment Property I A.E. as described in note 21 and note 44.

6. Gains less losses on derecognition of financial assets measured at amortised cost

The tables below present gains less losses for the year 2020 and 2019 from derecognition of financial assets measured at amortised cost as well as their carrying amount before derecognition.

	From 1 January to 31.12.2020			
	Carrying Amount	(Losses) from derecognition	Gains from derecognition	Gains less losses from derecognition
Early repayments:				
- Loans and advances to customers	1,656,658	(1,772)	2,530	758
Sales:				
- Loans and advances to customers	467,377	(635)	6,623	5,988
- Securities	596		14	14
Substantial modifications:				
- Loans and advances to customers	231,759	(1,939)	2,858	919
- Securities	1,941,392		170,526	170,526
Total	**4,297,782**	**(4,346)**	**182,551**	**178,205**

	From 1 January to 31.12.2019			
	Carrying Amount	(Losses) from derecognition	Gains from derecognition	Gains less losses from derecognition
Early repayments:				
- Loans and advances to customers	2,568,585	(3,826)	3,214	(612)
Sales:				
- Loans and advances to customers	90,799	(17,192)	2,168	(15,024)
Substantial modifications:				
- Loans and advances to customers	241,686	(6,274)	5,489	(785)
Total	**2,901,070**	**(27,292)**	**10,871**	**(16,421)**

"Early repayments" includes gains and losses that arise from the recognition in the income statement of the unamortised amounts of capitalized commission and fees from loans and advances to customers that were early repaid.

"Sales" include the following:

a) loans and advances to customers that were sold during the years 2020 and 2019, part of which have been classified as Assets held for sale during previous periods (note 44)

b) securities that were sold during the year 2020.

"Substantial modifications" includes the following:

a) the carrying amount of loans and advances to customers which were derecognized during the years 2019 and 2020 following the substantial modification of their contractual terms, as well as the related profit or loss from the derecognition and any valuation adjustment in the fair value of the newly recognized loans and advances to customers.

404 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

b) securities, that were derecognised during the year 2020 due to exchange transaction with the Greek Government. In particular, on 3.12.2020 the Bank agreed with the Greek Government, the exchange of existing Greek Government Bonds, classified in securities measured at amortized cost, with a nominal amount of € 1,670,000 and a fair value of € 2,111,917, with Greek Government Bonds maturing on 20.3.2050, with a nominal amount of € 1,100,000 and a fair value of € 1,643,536 including cash of € 468,381. The exchange, which had a settlement date of 11.12.2020, was performed on market terms. The gain of € 170,526 recognized in the income statement, resulted from the comparison of the fair value of the bond, maturing on 20.3.2050 and cash received with the carrying amount of the bonds exchanged. The bonds acquired were classified in securities measured at amortized cost (note 20).

7. Other income

	From 1 January to	
	31.12.2020	31.12.2019
Rental income	3,916	4,390
Sale of fixed assets	2,403	2,175
Insurance indemnities	497	450
Preparation of business plans and financial studies	486	2,620
Other	11,517	7,178
Total	**18,819**	**16,813**

Rental income of the current year includes an amount of € 1,003 (31.12.2019: € 806) which relates to income from subleases of fixed assets.

The caption "Other", as at 31.12.2020, includes an amount of € 1.682 (31.12.2019: € 462) which relates to prior year inflows from health contributions of insurance funds.

8. Staff costs and expenses for separation schemes

a. Staff costs

	From 1 January to	
	31.12.2020	31.12.2019
Wages and salaries	216,249	235,032
Social security contributions	64,567	75,453
Employee defined benefit obligation (note 31)	(196)	217
Bank's employee indemnity provision due to retirement in accordance with Law 2112/1920 (note 31)	3,220	4,832
Staff termination indemnities	4,731	
Cost of staff transferred to Cepal subsidiary	18,705	
Other charges	27,041	30,665
Total	**334,317**	**346,199**

The total number of the Bank's employees as at 31.12.2020 was 6.323 (31.12.2019: 6,993) out of which 6,316 (31.12.2019: 6,969) are employed in Greece and 7 (31.12.2019: 24) are employed abroad.

Staff costs have been impacted positively from the reduction of the Bank's employees which mainly relates to the participation in the voluntary exit program of 2019.

"Wages and salaries" and "Social security contributions" have been charged with costs relating to staff incentive schemes as a reward on employees performance defined by the Bank since 2018.

Specifically, since 2018, the Bank, following the relevant Board of Directors approval, recognizes provisions for the cost of the Sales Incentive Program, which represents only cash incentive, and of the Performance Incentive Program.

In 2019 the terms of the Performance Incentive Program were specified and the incentive to the employees and executives can have the form of cash or other financial instruments, whereas in year 2020, it was specified that the benefit relating to years 2018 and 2019 may be awarded in the form of cash and stock option rights.

405 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Based on the decision of the Board of Directors of December 2020, the terms that govern the existing incentive programs are as follows:

Award in cash

According to the terms of the programs, this award is paid in a lump sum by the Bank while the relevant expense is recognized at the time the employee acquires the right to receive this remuneration or, if the remuneration depends on targets, at the time of achievement.

For part of the staff, the benefit is paid in a lump sum of up to 60% while the payment of at least 40% is deferred for three years from the initial payment under the condition to remain in employment with the Bank. The recognition of the expense related to the amount whose payment is deferred for three years is recognized as the relevant services are provided.

During the 2020, the results were charged with an amount of € 8,647 (31.12.2019: € 9,678), relating to these programs.

Awarding of stock options rights

The Annual General Meeting of Shareholders of 31.07.2020 approved the establishment and implementation of a five year plan which provides the right to acquire newly – issued shares of the Bank (Stock Options Plan) by awarding of stock options rights to management and employees of the Bank and its connected entities. The plan concerns the period 2020-2024 and according to that the beneficiaries may exercise their right to acquire each new share with an offer price equal to the nominal value of the share, i.e. 0.30 €. The General Meeting also approved the assignment to the Board of Directors of the responsibility to determine the beneficiaries, the terms of options' awarding, as well as any other term and condition related to the plan, in accordance with the applicable legal and regulatory framework and Bank's policies.

Following the exercise of the Options Rights, the New Shares are subject to a twelve (12) months retention period.

The Board of Directors of the Bank, at its meeting of 30.12.2020: (a) approved the Plan's Regulation (b) awarded Stock Options Rights under the Performance Incentive Program for the fiscal years 2018 and 2019 to identified employees of the Bank and its connected entities.

On 31.12.2020, the Bank informed the beneficiaries about the terms and the exact amount of their reward according to their performance for the years 2018 and 2019.

In this context, for the years 2018 and 2019, the total number of options rights, granted and may exercised within the period 2021-2024, equals to 4,146,394, each of which corresponds to one (1) New Share, i.e. in case all Option Rights are exercised, up to a total of 4,146,394 newly – issued common, registered shares of the Bank, with a nominal value of Euro 0.30 each. Correspondingly, based on the deferral periods of each Program, the exercise periods have been set as follows:

Exercise period	Total maximum number of exercised options
January 2021	2,563,945
January 2022	552,818
January 2023	552,890
January 2024	476,741
Total	**4,146,394**

For the options for which the exercise period is January 2021, there are no specific vesting conditions at the time of awarding, while for the rest of the options the condition to remain under the Bank employment is prerequisite.

As at 31.12.2020, the Bank recognized in the results for the year, through a credit on the reserves, an amount of € 1,495 resulting from the valuation at fair value, on the date awarding the above options, that as at 31.12.2020 no specific vesting conditions existed. In addition, an amount of € 172 relating to the valuation of the stock option granted by the Bank to the executives of Group companies that as at 31.12.2020 no specific vesting conditions existed, was recognized in equity by charging the cost of investment in the respective companies of the Group.

The fair value of the above rights was determined as the difference between the stock price of the share on the date of concession and the exercise price.

406 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The caption "Cost of staff transfer to Cepal subsidiary" relates to the compensation to the Bank's staff in the context of the transfer of the Bank's Non-performing Management Activity (carve-out) to its subsidiary Cepal Hellas SA ("Cepal") as detailed described in note 32. The voluntary termination of the employment contract required the payment by the Bank of an amount equivalent to ten (10) gross monthly salaries, as these will be determined on 1.12.2020 based on the provisions of the Sectoral Collective Agreement OTOE - Banks 2019 -2021 (basic scale) with a minimum limit of € 25,000. The abovementioned amount, includes cost for the compensation of senior executives transferred to Cepal Hellas as described below in the relevant program.

Defined contribution plans

TAll the employees of the Bank are insured for their main pension plans by the Social Insurance Fund (IKA-ETAM). The Social Insurance Fund (IKA-ETAM) as of 1.1.2017 consists part of the Single Social Security Body (E.F.K.A.), Public law entity established under the provisions of Law 4387/2016. In addition for the Bank's employees, the following also apply:

a. Staff from the former Alpha Credit Bank and the former Emporiki Bank are insured for subsidiary insurance at the E.T.E.A.E.P (Joint Supplementary Insurance Fund and Lump Sum benefits), as renamed on January 1, 2017 by E.T.E.A. with Law 4387/2016. Pre-retirement pensioners are insured as of 1.1.2017 with the Single Social Security Agency (EFKA) under the same Law.
b. The supplementary pension plan for employees of the former Ionian and Laiki Bank of Greece is T.A.P.I.L.T.A.T., a multi-employer plan. The Bank has obtained legal opinions that indicate that it has no obligation if this fund does not have sufficient assets to pay employee benefits. Therefore, the Bank considers that the fund is a defined contribution plan and has accounted for it as such.
c. Employees of former Ionian and Laiki Bank of Greece and former Emporiki Bank are insured for the lump sum benefit (Welfare Sector) in the "Bank Employee and Companies Common Benefit Plan" (T.A.Y.T.E.K.O.) which is a defined contribution plan with contributions paid only by employees. In accordance with article 74 of Law 4387/2016, the Care Sectors of the "Bank Employee and Companies Common Benefit Plan" (T.A.Y.T.E.K.O.) consist part of the E.T.E.A.E.P (Joint Supplementary Insurance Fund and Lump Sum benefits).
d. All employees of the Bank receive medical benefits from the National Organization of Health Care (EOPYY) and either in the Care Sector of the former T.A.Y.T.E.K.O. or the former E.T.A.A, both of which have been incorporated into Single Social Security Body (E.F.K.A.) since 1.1.2017.
e. Retirement/Savings Insurance Plans
   i) The Bank, in cooperation with insurance company, has created a savings plan. The plan's effective date is January 1, 2011 and its aim is to provide a lump sum monetary benefit to retiring employees. The plan assets consist of investment from the fixed monthly contributions of the Bank and its employees.

      Initially the plan included Bank's personnel that were hired and insured for the first time on 1.1.1993 and onwards. After signing the Collective Labor Agreement for the 3-year period of 2016-2019, the personnel of the Bank may be included in the savings plan.

      Except from those employees, that were hired by the Bank and were members of the main pension scheme for the period from 1.1.1993 until 31.12.2004 for which a minimum payment guarantee is required(Law 2084/1992), for the remaining employees, the plan is considered to be a defined contribution plan, given that the benefit is paid out from a savings fund that was accumulated up to the date they leave.
   ii) Following the Board of Directors' and General Assebly's decision, the Bank provides to its senior management a group retirement and savings Insurance Plan with effect from 1.1.2018. The plan is a defined contribution plan and aims to provide a lump-sum benefit upon retirement. The savings fund sums up from the investment of defined monthly contributions paid by the senior management and the Bank.

The Bank's "Investment Committee for group insurance employee plans of Alpha Bank" is responsible for determining the appropriate structure of the portfolio of the aforementioned saving plans.

Employee defined benefit obligations

An analysis of liabilities arising from defined benefit plans is included in note 31.

b. Expenses for employee separation schemes

	From 1 January to	
	31.12.2020	31.12.2019
Expenses for employee separation schemes		49,615
Total	-	**49,615**

In the context of improving the efficiency and reducing the operating costs under the provisions of the Bank's Business Plan for 2017-2019, the employee separation scheme that was in force for the period 2016-2018 completed within 2019. From the total provision amount of € 59,004 recognised as at 31.12.2018, during 2019 an amount of € 9,484 was used and the rest of the amount of € 42,916 was reversed.

A voluntary exit program was launched in September 2019, providing as compensation the 100% of the compensation defined by law, plus an incentive based on the age and the years of service and an increase for those employed in specific central services. The program alternatively provided long-term paid leave with the form of either a three or five year leave. The total provision to cover the costs of the voluntary exit program within 2019 amounted to € 89,861 (note 33).

On 29.6.2018 the General Assembly of Shareholders approved the senior executives' compensation plan, a benefit which was further specified by a Regulation subsequently issued. It is noted that the payment of the benefit is voluntary, does not constitute a business practice and may be terminated in the future with the decision of the General Assembly of Shareholders. The charge for the year 2019 for this program amounted to € 2,670, while the respective amount for the year 2020 (€ 1,165) is included in the line item "Cost of staff transfer to Cepal subsidiary".

9. General administrative expenses

	From 1 January to	
	31.12.2020	31.12.2019*
Lease expenses	335	2,631
Maintenance of EDP equipment	16,258	14,370
EDP expenses	17,515	19,273
Marketing and advertising expenses	16,408	19,384
Telecommunications and postage	12,231	14,030
Third party fees	29,748	36,422
Consultants fees	8,370	8,262
Contribution to the Deposit / Investment Coverage Scheme and to the Resolution Scheme	55,407	51,258
Insurance	7,178	7,230
Consumables	2,339	2,962
Electricity	5,721	6,696
Taxes and Duties (VAT, real estate etc)	66,385	69,893
Services from collection agencies	2,569	8,705
Building and equipment maintenance	4,670	4,984
Security of buildings-money transfers	9,894	9,709
Cleaning expenses	3,560	3,588
Commission for the amount of Deferred Tax Asset guaranteed by the Greek State (note 13)	5,296	5,469
Services for NPL management	15,748	11,489
Other	89,640	81,943
Total	369,272	**378,298**

General administrative expenses present a decrease compared to prior year, mainly due to the decrease of expenses related to the management of debts in arrears, due to the slowdown of the relevant actions as a result of Covid-19 pandemic and the related debtors' relief measures provided for the management of their debt, as well as due to certain cost-cutting measures on advertising and postage costs. The aforementioned decrease was partially offset with the increase of the Bank's contribution to the Single Resolution Board ("SRB"), the Single Resolution Fund of the Hellenic Deposit and Investment Guarantee Fund,

* Certain figures of the previous year have been restated as described in note 47.

408 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

as well as the costs of the management services of non-performing loans due to the carve out of the NPE unit to the Banks subsidiary, Cepal Hellas, as in detail described in note 32.

The caption "Lease expenses" includes expenses for short-term leases, low value leases and variable lease payments which are not included in lease liabilities.

10. Other expenses

	From 1 January to	
	31.12.2020	31.12.2019*
Losses from disposals/write-off/impairment on plant, property and equipment	2,031	9,031
Provisions for operating loss events	8,132	21,046
Other	5,820	2,930
Total	**15,983**	**33,007**

"Losses from disposals/write-off/impairments on plant, property and equipment" as at 31.12.2020 includes an amount of € 13,471 (31.12.2019: € 1,817) from the recognition of impairment losses of property plant and equipment, assets obtained from auctions and investment property as well as an amount of profit of € 12,535 (31.12.2019: € 2,892 loss) from the reversal impairment of right-of-use assets resulted mainly from the reevaluation of the lease contract duration. The main events and circumstances that led to the recognition of impairment losses are related to:

- Deterioration of its physical condition and / or obsolescence of technology
- Change of use in the extent or manner in which the asset is being used
- Muted consumer demand for a medium-term period in certain submarkets which led to value change
- Institutional interventions that negatively affected certain assets

Furthermore, this caption includes losses from disposal/destruction of plant, property and equipment amounting to € 1,095 (31.12.2019: € 4,322). The aforementioned impairment losses and losses from the disposals of plant, property and equipment are included in the operating segment "Other / Elimination Center" in note 39 "Operating segments".

"Provisions for operating loss events" as at 31.12. 2020 relates to provisions for legal cases against the Bank while in year 2019 mainly include an amount of € 21,686 which relates to provision recorded based on the Bank's assessment of the inadmissibility of appeals filed in the past related to the payment of insurance contributions, as well as, the reversal of € 640 related to legal cases issued against the Bank. The aforementioned amounts are included in "Other provisions" of note 33.

11. Impairment losses and provisions to cover credit risk on loans and advances to customers

"Impairment losses and provisions to cover credit risk" for year 2020 amounted to € 1,142,715 (31.12.2019: € 924,799) and includes the total of the captions presented in the table below, along with the impairment losses on other financial instruments, as presented in note 12.

The following table presents the impairment losses and provisions to cover credit risk on loans and advances to customers, financial guarantee contracts, other assets as well as recoveries:

	From 1 January to	
	31.12.2020	31.12.2019
Impairment losses on loans	1,062,998	745,602
Impairment losses on advances to customers	28,173	14,623
Provisions to cover credit risk on letters of guarantee, letters of credit and undrawn loan commitments (note 33)	1,662	6,464
(Gains) / Losses from modifications of contractual terms of loans and advances to customers	54,274	181,503
Recoveries	(15,104)	(18,110)
Impairment losses on other assets	(8)	
Total	**1,131,995**	**930,082**

* Certain figures of the previous year have been restated as described in note 47.

409 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

For the year 2020, Impairment losses and provisions to cover credit risk on loans and advances to customers amounted to € 1,131,995 (31.12.2019: € 930,082) and include the effect from the impact from the global economic crisis caused by the Covid-19 pandemic and the recognition of impairment losses for the upcoming sales transactions, as detailed described in note 40.1.

Gains/(Losses) on modifications of contractual terms of loans and advances to customers

The Bank, in the context of renegotiation with borrowers or of restructurings, proceeds with the modification of the contractual cash flows of the loans in order to ensure their repayment.

The following table presents the carrying amount of those loans and advances to customers for which there was gain or loss from the modification of the contractual terms and loss allowance were measured at an amount equal to lifetime expected credit loss i.e loans categorised Stages 2, or stage 3 or loans Purchased or originated credit-impaired (POCI).

	From 1 January to	
	31.12.2020	**31.12.2019**
Net carrying amount before the modification	8,159,643	19,915,361
Net gain or (loss) due to the modification	(41,656)	(203,094)

The following table presents the carrying amount of loans and advances to customers that modified at a time they had a lifetime expected credit loss and for which the allowance is measured based on 12-month expected credit risk losses at the end of the year.

	31.12.2020	**31.12.2019**
Carrying amount before allowance for expected credit losses at the end of the year	1,536,057	878,625

12. Impairment losses and provisions to cover credit risk on other financial instruments

	From 1 January to	
	31.12.2020	**31.12.2019**
Impairment losses of debt securities and other securities measured at amortized cost	8,781	7,412
Impairment losses of debt securities and other securities measured at fair value through other comprehensive income	2,608	(11,047)
Impairment losses on due from banks	(669)	(1,648)
Total	**10,720**	**(5,283)**

The impairment losses of debt securities during 2020 are mainly due to placements in Greek Government bonds and of other issuers within the portfolio of debt securities measured at amortized cost. The losses were limited by the upgrade of the credit rating of the Greek Government bonds from B1 to Ba3 in November 2020. It is noted that Covid-19 pandemic did not lead to a significant increase in credit risk on other securities held by the Bank.

The positive impact on the expected credit losses for debt securities within 2019 derives from the upgrading of the credit rating of the Greek Government by Moody's on 1.3.2019 to B1 from B3 and the positive impact on expected credit risk losses of due from Banks, is mainly due to the decrease of respective balances.

13. Income tax

According to article 22 of Law 4646 / 12.12.2019 "Tax reform with a growth dimension for tomorrow's Greece", the tax rate on business profits acquired by legal entities in Greece, is reduced to 24% on income of fiscal year 2019 onwards. By explicit reference to the law, this reduction does not apply to credit institutions for which the tax rate is still 29%.

Article 20 of the same law exempts income tax on income derived from the goodwill of the transfer of equity instruments to a legal entity resident in a Member State of the European Union, which a legal entity receives which is a tax resident of Greece if the legal entity whose titles are transferred fulfills the conditions prescribed by law. This income shall not be taxable on the distribution or capitalization of these profits. Any impairment losses recognized as at 31.12.2019 are deducted under certain conditions from gross income at the time of transfer. The provision applies to income derived from 1.7.2020 and onwards.

410 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Furthermore, the withholding rate is reduced to 5% from 10% in dividends paid from 1.1.2020 onwards.

In accordance with article 65A of Law 4174/2013, from 2011, the statutory auditors and audit firms conducting statutory audits to a Societe Anonyme (S.A.), are obliged to issue an Annual Tax Certificate on the compliance on tax issues. This tax certificate is submitted to the entity being audited within the first ten days of the tenth month after the end of the audited financial year, as well as, electronically to the Ministry of Finance, no later than the end of the tenth month after the end of the audited financial year. In accordance with article 56 of Law 4410/3.8.2016 for the fiscal years from 1.1.2016 and onwards, the issuance of tax certificate is optional. However, the Bank intends to continue to obtain the tax certificate.

For the fiscal years 2011 up to 2019, the tax audit based on article 65A of L. 4174/2013 for the Bank has been completed and the Bank has received the relevant tax certificate without any qualifications on the tax issues covered.

The tax audit for the fiscal year 2020 is in progress.

The income tax is analysed as follows:

	From 1 January to	
	31.12.2020	31.12.2019*
Current tax	20,103	3,050
Deferred tax	55,025	26,801
Total	**75,128**	**29,851**

Deferred tax recognized in the income statement is attributable to temporary differences, the effect of which is analyzed in the table below:

	From 1 January to	
	31.12.2020	31.12.2019*
Debit difference of Law 4046/2012	44,555	44,555
Debit difference of Law 4465/2017	(1,652,405)	(14,082)
Write-offs, depreciation, impairment of plant, property and equipment and leases	16,320	12,871
Loans portfolio	1,638,005	(221,350)
Valuation of loans due to hedging	582	(261)
Valuation of derivative financial instruments	(26,496)	21,232
Defined benefit obligation and insurance funds	1,664	2,112
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	560	345
Valuation/Impairment of investments	98,425	(4,039)
Valuation/Impairment of debt securities and other securities	20,326	10,912
Tax losses carried forward		163,599
Other temporary differences	(86,511)	10,907
Total	**55,025**	**26,801**

"Other temporary differences" includes an amount of € 66,251 relating to the deferred tax asset recognized from the transfer of the Bank's NPE unit (carve-out) to the subsidiary Cepal Hellas S.A. as the profit from the transfer has been recognized for tax purposes in the current year while for IFRS purposes does not meet the recognition criteria (see note 32).

The Bank, in the context of the restructuring of the Group's subsidiaries under three pillars, which was completed within December 2020, reversed the deferred tax asset that was recognized on the investments classified as held for sale amounting to € 117,814 and included within caption "Valuation / impairment of investments" since part of the result of the aforementioned transaction, relating to losses for which on impairment loss of the investment was recognized until 31.12.2019, was deducted for tax purposes in accordance with the provisions of Article 20 of Law 4646 / 12.12.2019, as mentioned above.

"Debit difference of Law 4046/2012" relates to the deferred tax asset on tax losses, due to the Bank's participation in the Greek government bonds exchange program (PSI) and the Greek government bond buyback program on December 2012, which have been recognized as a debit difference in accordance with Law 4046/14.2.2012 and Law 4110/23.1.2013. According to Law 4110/23.1.2013 this "debit difference" is tax deductible, gradually in equal installments, within 30 years.

* Certain figures of the previous year have been restated as described in note 47.

411 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Moreover, according to article 5 of Law 4303/17.10.2014 "Ratification of the Legislative Act Emergency legislation to replenish the General Secretary of Revenue upon early termination of office (A 136) and other provisions", which replaced article 27A of Law 4172/2013, deferred tax assets of legal entities supervised by the Bank of Greece, under article 26 paragraphs 5, 6 and 7 of Law 4172/2013 that have been or will be recognized and are due to the debit difference arising from the PSI and the accumulated provisions and other general losses due to credit risk, with respect to existing amounts up to 31.12.2014, are converted into final and settled claims against the State, if, the accounting result for the year, after taxes, is a loss, according to the audited and approved financial statements by the Ordinary Shareholders' General Meeting.

The inclusion in the Law is implemented with the approval of the General Meeting of Shareholders and relates to tax assets arising from 2016 and onwards, relating to fiscal year 2015 whereas it is envisaged the end of inclusion in the Law with the same procedure and after obtaining relevant approval from the Regulatory Authority.

According to article 4 of Law 4340/1.11.2015 "Recapitalization of financial institutions and other provisions of the Ministry of Finance" the above were amended regarding the time of the application which is postponed for a year. In addition the amount of the relevant deferred tax asset which is included in the above provisions of article 5 of Law 4303/17.10.2014 and relates to accumulated provisions and other general losses due to credit risk, is limited to the amount related to the provisions for credit risk, which were accounted until 30.06.2015.

In connection with the amount included in caption "Debit difference of Law 4465/2017", according to article 43 of Law 4465/4.4.2017 "Integration of Directive 2014/92/EU of the European Parliament and Council held on 23.7.2014 for the comparability of charges related to payment accounts, the change of payment account and the access to payment accounts with basic characteristics and other provisions", the articles 27 and 27A of the Income Tax Code were amended (Law 4172/2013). In particular, par. 3 of article 27, as amended, provides the right to amortize losses registered by the above legal entities, for a period of 20 years, if these losses resulting from debt write offs from their balance sheet due to loan settlement or restructuring contractually, judicial or extrajudicial or due to the transfer of the loan to companies of loan acquisition or securitization or to credit and financial institutions or other companies and legal entities under the condition that the management of these loans is carried out by a claims servicing company. The tax benefit of the 20-year depreciation is given only to the realized losses. In case of an accounting write-off of the loan considering that the events for the final debt write off or transfer of the loan have not yet completed, the tax result, for the year of the accounting write-off, is not affected. When these events occur, the amount that was written off will be converted into a debit difference and will be amortized over the estimated 20-year period.

The amended provisions of Article 27a explicitly provide that in addition to the deferred tax asset relating to the amount of accumulated provisions and other general losses due to credit risk and to the remaining (amortized) balance of the PSI, the deferred tax asset relating to accounting write-offs and final losses due to final write-off or transfer of loans, under certain conditions, can be converted to final and settled receivable against the State and therefore to be included in the regulatory capital. It is noted that the right to convert deferred tax assets into final and settled against the State, had already been provided in the legislative framework since 2014 in order to avoid losses in the regulatory capital of credit institutions.

Based on the above mentioned Law, the total amount of deferred tax asset from (a) the debit difference of Law 4465/2017 (b) the temporary differences from any accounting write-off of loans and credits and (c) the temporary differences from accumulated provisions and other losses due to credit risk, is limited to the total tax amount related to accumulated provisions and other losses due to credit risk, recognised until 30.6.2015.

This amendment ensures that the loan write-offs and disposals, aiming to decrease the non-performing loans, will not result in the loss of regulatory capital.

The above apply from 01.01.2016.

On 31.12.2020, the amount of deferred tax assets which is estimated to be within the scope of the Law 4465/2017, as well as the amortized balance of the debit difference of Law 4046/2012 (PSI) amounts to € 3,030 million (31.12.2019: € 3,166.7 million).

"Debit difference of Law 4465/2017" in current year includes deferred tax asset amounting to € 1,486,703 that resulted from the securitization of loans (project Galaxy), as detailed in note 19 and 48. According to the terms of the transaction, the related allowances for credit losses were considered final losses and for tax purposes are subject to annual amortization for a period of

20 years. As a result the balance of the account increased with an equal decrease of the deferred tax of the caption “Loans”.

According to article 82 of Law 4472/19.5.2017 “Public Pension Provisions and amendment of provisions of Law 4387/2016, measures for the implementation of budgetary targets and reforms, social support measures and labor regulations, Medium term Fiscal Strategy Framework 2018-2021 and other provisions” credit institutions and other entities that fall under the provisions of article 27A of Law 4172/2013, are required to pay an annual commission of 1.5% for the amount of the guaranteed by the Greek State deferred tax asset that results from the difference between the tax rate currently in force (29%) and the tax rate that was in force on 31.12.2014 (26%). The respective amount of € 5,296 is included in caption “General administrative expenses” (note 9).

A reconciliation between the effective and nominal tax rate is provided below:

	From 1 January to			
	31.12.2020		31.12.2019*	
	%		%	
Profit / (Loss) before income tax		**213,525**		**90,782**
Income tax (nominal tax rate)	29	61,922	29	26,327
Increase / (Decrease) due to:				
Non-taxable income	(15,11)	(32,253)	(11,74)	(10,660)
Non-deductible expenses	1,83	3,903	5,56	5,051
Reversal of provision for legal claims	(16,99)	(36,274)		
Other tax adjustments	36,45	77,830	10,06	9,133
Income tax (effective tax rate)	**35,18**	**75,128**	**32,88**	**29,851**

The Bank, following the reassessment of the recoverability of legal claims from withholding taxes, reversed the recognized provision amounting to € 36,274.

“Other tax differences” includes an amount of € 25,877 relating to the reversal of deferred tax asset that was calculated on investments classified as assets for sale, due to a changes in the tax regime as abovementioned in Article 20 of Law. 4646/2019.

In addition, the caption “Other tax differences” includes an amount of € 12,502 relating to a reversal of deferred tax estimated that it would not be recovered.

Income tax of other comprehensive income recognized directly in equity

	From 1 January to					
	31.12.2020			31.12.2019*		
	Before Income tax	Income tax	After Income tax	Before Income tax	Income tax	After Income tax
Amounts that may be reclassified to the Income Statement						
Net change in the reserve of debt securities measured at fair value through other comprehensive income	(363,393)	105,384	(258,009)	475,994	(138,039)	337,955
Net change in cash flow hedge reserve	20,841	(6,044)	14,797	(130,454)	37,833	(92,621)
	(342,552)	**99,340**	**(243,212)**	**345,540**	**(100,206)**	**245,334**
Amounts that will not be reclassified to the Income Statement						-
Net change in actuarial gains/(losses) of defined benefit obligations	(3,242)	940	(2,302)	(10,931)	3,170	(7,761)
Gains/(Losses) from equity securities measured at fair value through other comprehensive income	4,064	(1,179)	2,885	(20,121)	5,835	(14,286)
	822	**(239)**	**583**	**(31,052)**	**9,005**	**(22,047)**
Total	**(341,730)**	**99,101**	**(242,629)**	**314,488**	**(91,201)**	**223,287**

On 1.1.2019, an amount of € 11,408 was recognized in “Retained earnings” relating to a credit deferred tax as a result of the implementation of IFRS 16.

* Certain figures of the previous year have been restated as described in note 47.

413 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Tax advances and withholding taxes

Further to the information detailed provided in note 13 of Bank Financial Statements as at 31.12.2019, it is noted that article 93 of Law 4605/1.4.2019 "Alignment of Greek legislation with the European Parliament and Council Directive (EU) 2016/943 of 8.6.2016 on the protection of undisclosed know-how and business information (trade secrets) against their unlawful acquisition, use and disclosure (EEL 157, 15.6.2016) - Measures for accelerating the work of the Ministry of Economy and other provisions" provides that:

- The credit balances of fiscal years 2008 and 2010 up to 2012 that arose from withholding taxes on specially taxed income are transferred and will be offset at the time when income tax is incurred and in proportion to that tax. This set-off procedure also includes any amounts refunded by virtue of court decisions, for which the obligation to return them to the Greek State is borne at the time and proportionally to the amount of the income tax recognized. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 85,156.
- The credit balances that arose under Law 4046/2012 and have not been offset after the end of the five-years period from their recognition, will be offset starting from 1.1.2020 in ten equal annual installments with any tax liability of the banks. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 63,114.

Following the abovementioned Law decisions, the Banks' receivables against the Greek State from withholding taxes will be subject to the offset procedure described in the above provisions. During 2020, the Bank offseted with current tax liabilities an amount of € 6,311, that corresponds to the 1/10th of the total credit balance of € 63,114.

14. Earnings/(losses) per share

a. Basic

Basic earnings/(losses) per share are calculated by dividing the net profit/(losses) for the year attributable to ordinary equity owners of the Bank, by the weighted average number of ordinary shares outstanding during the period, excluding own shares held by the Bank, during the period.

	From 1 January to	
	31.12.2020	31.12.2019*
Profit / (Loss) attributable to equity holders of the Bank	**138,397**	**60,931**
Weighted average number of outstanding ordinary shares	1,543,699.381	1,543,699.381
Basic earnings /(losses) per share (in €)	0.0897	0.0395

b. Diluted

Diluted earnings/(losses) per share are calculated by adjusting the weighted average number of ordinary shares outstanding during the period with the dilutive potential ordinary shares. The Bank holds shares of this category, which arise from a plan of awarding stock options rights to employees of the Bank and its connected entities (note 8).

For the calculation of the diluted earnings per share, it is assumed that the option rights are exercised and that the related inflows derive from the issuance of common shares at the average market price of the year during which the options were outstanding. The difference between the number of options to be granted and the ordinary shares issued at the average market price for ordinary shares, is recognized as issuance of ordinary shares without exchange.

	From 1 January to	
	31.12.2020	31.12.2019*
Profit / (Loss) attributable to equity holders of the Bank	**138,397**	**60,931**
Weighted average number of outstanding ordinary shares	1,543,699,381	1,543,699,381
Adjustment for options	4,598	
Weighted average number of outstanding ordinary shares for diluted earnings per share	1,543,703,979	1,543,699,381
Diluted earnings /(losses) per share (in €)	0.0897	0.0395

It is noted that in January 2021, 2,281,716 stock options rights were exercised, which resulted in the issuance of 2,281,716 ordinary, registered and voting shares with a nominal value of € 0.30 each. The Share Capital of the Bank increased by € 685 and the reserve from the difference from the issuance of equity shares increased by € 1,483.

* Certain figures of the previous year have been restated as described in note 47.

415 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ASSETS

15. Cash and balances with Central Banks

	31.12.2020	31.12.2019
Cash	259,960	324,608
Cheques receivables	1,050	14,542
Balances with Central Banks	6,421,222	862,657
Total	**6,682,232**	**1,201,807**
Less: Deposits pledged to Central Banks		
Total	**6,682,232**	**1,201,807**

The increase in Cash and Balances with Central Banks is mainly due to the increase of funding by the Eurosystem, as described in note 27.

Cash and cash equivalents (as presented in the Statement of Cash Flows)

	31.12.2020	31.12.2019
Cash and balances with central banks	6,682,232	1,201,807
Securities purchased under agreements to resell (Reverse Repos)	240,025	1,164,950
Short-term placements with other banks	144,886	173,440
Total	**7,067,143**	**2,540,198**

16. Due from banks

	31.12.2020	31.12.2019
Placements with other banks	793,807	858,902
Guarantees for derivative securities coverage and repurchase agreements (note 38)	1,632,348	1,345,744
Securities purchased under agreements to resell (Reverse Repos)	240,025	1,164,950
Loans to credit institutions	36,966	36,966
Less:		
Allowance for expected credit losses (note 40.1)	(72,956)	(73,624)
Total	**2,630,190**	**3,332,938**

The reduction in Due from banks is mainly attributable to the termination of agreements of Reverse Repo transactions.

17. Trading securities

The following table presents an analysis of the carrying amount of trading portfolio per type of security.

	31.12.2020	31.12.2019
Bonds		
- Greek Government	29,154	17,490
- Other issuers		371
Equity shares		
- Listed	264	786
Total	**29,418**	**18,647**

416 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

18. Derivative financial instruments (assets and liabilities)

	31.12.2020		
	Contractual Nominal Amount	Fair Value	
		Assets	Liabilities
Derivatives held for trading purposes			
a. Foreign exchange derivatives			
Foreign exchange forwards	257,295	5,634	4,846
Foreign exchange swaps	1,330,373	9,384	4,347
Cross currency swaps	677,982	12,092	17,932
Currency options	461,030	1,777	1,805
Currency options embedded in customer products	853	2	
Total non-listed	**2,727,533**	**28,889**	**28,930**
b. Interest rate derivatives			
Interest rate swaps	25,581,701	1,218,873	1,712,289
Interest rate options (caps and floors)	883,084	11,860	11,623
Total non-listed	**26,464,785**	**1,230,733**	**1,723,912**
c. Commodity derivatives			
Commodity swaps	307,524	5,241	4,238
Total non-listed	**307,524**	**5,241**	**4,238**
d. Index derivatives			
Index swaps	40,668	262	262
OTC options	1,696	19	19
Index options embedded in customer products			
Total non-listed	**42,364**	**281**	**281**
e. Credit derivatives			
Total return swap	151,252	1,311	
Total non-listed	**151,252**	**1,311**	**-**
f. Other derivatives			
GDP linked security	636,920	2,420	
Total listed	**636,920**	**2,420**	**-**
Derivatives for fair value hedging			
a. Foreign exchange derivatives			
Foreign exchange swaps	54,851	402	
Total non-listed	**54,851**	**402**	**-**
b. Interest rate derivatives			
Interest rate swaps	2,095,000	3,647	11,861
Total non-listed	**2,095,000**	**3,647**	**11,861**
Grand Total	**32,480,229**	**1,272,924**	**1,769,222**

In the context of the daily process for setting off and providing collateral for derivatives transactions with credit institutions counterparties the Bank has pledged as collateral a net amount of € 1,627,743 (31.12.2019: € 1,324,654) on 31.12.2020, of which the received net amount of € 750 (31.12.2019: € 4,050) relates to transactions with Group subsidiaries. The respective net fair value of derivatives with credit institutions amounted to € 1,513,194 (31.12.2019: € 1,232,536) on 31.12.2020.

417 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019		
	Contractual Nominal Amount	Fair Value	
		Assets	Liabilities
Derivatives held for trading purposes			
a. Foreign exchange derivatives			
Foreign exchange forwards	198,501	1,261	1,392
Foreign exchange swaps	1,258,158	9,398	1,420
Cross currency swaps	1,064,211	34,929	45,079
Currency options	55,939	1,288	1,283
Currency options embedded in customer products	4,129	17	64
Total non-listed	**2,580,938**	**46,893**	**49,238**
b. Interest rate derivatives			
Interest rate swaps	15,906,397	956,972	1,071,977
Interest rate options (caps and floors)	212,592	2,767	1,125
Total non-listed	**16,118,989**	**959,739**	**1,073,102**
c. Commodity derivatives			
Commodity swaps	54,139	2,178	1,877
Total non-listed	**54,139**	**2,178**	**1,877**
d. Index derivatives			
OTC options	73,605	1,950	21
Index options embedded in customer products	182	3	62
Total non-listed	**73,787**	**1,953**	**83**
e. Credit derivatives			
Total return swap	171,197	10,499	
Total non-listed	**171,197**	**10,499**	**-**
f. Other derivatives			
GDP linked security	762,748	2,288	
Total listed	**762,748**	**2,288**	**-**
Derivatives for fair value hedging			
a. Foreign exchange derivatives			
Foreign exchange swaps	211,050	90	102
Total non-listed	**211,050**	**90**	**102**
b. Interest rate derivatives			
Interest rate swaps	871,800	844	323,301
Total non-listed	**871,800**	**844**	**323,301**
Grand Total	**20,844,648**	**1,024,484**	**1,447,703**

Hedging accounting

a. Fair value hedges

The Bank uses interest rate swaps to hedge its exposure to changes in the fair values due to changes in market rates of fixed interest rate: a) Greek Government Bonds, b) retail loans and c) a specific corporate loan.

The Bank also uses foreign currency swaps to hedge the currency risk of its net investment in subsidiaries.

For all hedges of interest rate risk, the Bank determines the referenced interest rate associated with the hedged risk (Euro rate) at inception of the hedging relationship and calculates the changes in the fair value of the hedging instrument with respect to euro interest rate curve. For the hedge of the currency risk in the investments in subsidiaries, risk arises from the fluctuation in spot exchange rates between the exchange rate of the investment and the Euro. More specifically, the investments are translated at the current exchange rate and the exchange differences that arise from the inception of the hedging relationship are compared with the exchange differences of the derivative.

The amendments of the related IFRS that address issues arising from the interest rate benchmark reform do not expect to have any impact to the existing fair value hedges considering that the hedging instruments are applied with the corresponding Euribor referenced interest rate and that it is not replaced with any alternative interest rate.

418 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In order to measure hedge effectiveness, the changes in the fair value of the hedged item are compared to the changes in the fair value of the hedging instrument and in order for the hedge to qualify as effective, the ratio of the change in the fair value of the hedging instrument over the change in the fair value of the hedged item is required to be within 80% -125% (dollar offset method).

The Bank has identified the following sources which may lead to hedging ineffectiveness:

a) Credit risk of the derivative counterparty, which is not offset by the hedged item. The Bank minimizes counterparty credit risk in derivative instruments by entering into transactions with counterparties which are also covered with collateral agreements.

b) Difference in timing of cash flows of hedged items and hedging instruments.

During the year, the Bank did not identify any other source of hedging ineffectiveness.

On 10.3.2020, the Bank designated as hedging instrument a Greek Government bond measured at amortised cost of a nominal value of € 58,000. On 6.4.2020, the hedging relationship of Greek Government bonds measured as fair value through other comprehensive income of nominal value € 720,000 was discontinued and a new hedging relationship was designated for Greek Government Bonds measured at amortized cost of nominal value of € 667,000 which in turn was discontinued on 3.12.2020. On 3.12.2020 a new hedging relationship was designated for Greek government bond measured at amortized cost with a nominal value of € 800,000.

Duration, nominal amount, interest rate and the foreign exchange of the hedging instruments of 31.12.2020 are summarized as follows:

	Duration
Risk category	**1 - 5 years**
Interest rate risk	
Tier II Bond issued by the Bank	
Nominal amount of the derivative	500,000
Average fixed interest rate	(0.32%)
Fixed rate retail loans	
Nominal amount of the derivative	450,000
Average fixed interest	(0.39%)
Foreign currency risk	
Investment in Alpha Bank London	
Nominal amount of the derivative	54,851
Foreign Exchange rate	0.89

	Duration
Risk category	**> 5 years**
Interest rate risk	
Greek Government bond Nominal amount of € 800,000	
Nominal amount of the derivative	1,095,000
Average fixed interest	(0.06%)
Greek Government bond Nominal amount of € 58,000	
Nominal amount of the derivative	50,000
Average fixed interest	(0.17%)

419 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Duration, nominal amount, interest rate and the foreign exchange of the hedging instruments of 31.12.2019 are summarized as follows:

	Duration
Risk category	**1 - 5 years**
Interest rate risk	
Fixed rate retail loans	
Nominal amount of the derivative	450,000
Average fixed interest	(0.39%)
Corporate loan	
Nominal amount of the derivative	21,800
Average fixed interest	0.02%
Foreign currency risk	
Investment in Alpha Bank London	
Nominal amount of the derivative	57,506
Foreign Exchange rate	0.85
Investment in Alpha Bank Romania	
Nominal amount of the derivative	153,544
Foreign Exchange rate	4.85

	Duration
Risk category	**> 5 years**
Interest rate risk	
Greek Government bonds Portfolio Nominal amount of € 720,000	
Nominal amount of the derivative	400,000
Average fixed interest	0.06%

420 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The balance sheet and the income statement amounts relating to items designated as fair value hedging instruments and the hedge effectiveness are analyzed as follows:

2020							
Hedging relationship	**Derivative category**	**Carrying amount of hedging instrument**		**Line item in the balance sheet where the hedging instrument is included**	**Change in fair value of hedging instrument used for calculating the hedge effectiveness for 2020**	**Ineffectiveness recognised in the income statement for 2020**	**Line item in the Income statement that included hedge ineffectiveness**
		Assets	**Liabilities**				
Interest rate risk							
Greek Government bonds Portfolio Nominal amount € 720 m.					(34,043)	(5,083)	
Greek Government bonds Portfolio Nominal amount € 667 m.					(13,588)	550	
Greek Government bond Nominal amount € 800 m.			11,027		(10,683)	(1,076)	Gains less losses on financial transactions
Greek Government bond Nominal amount € 58 m.	Interest rate swap	375		Derivatives	(280)	(18)	
Tier II Bond issued by the Bank		3,254			4,143	(18)	
Corporate loan					74		
Fixed rate retail loans	Interest rate swap	18	834	Derivatives	(2,052)	29	
Foreign currency risk							
Investment in Alpha Bank London in GBP	Foreign exchange swap	402		Derivatives	3,090		Gains less losses on financial transactions

421 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

2019							
Hedging relationship	**Derivative category**	**Carrying amount of hedging instrument**		**Line item in the balance sheet where the hedging instrument is included**	**Change in fair value of hedging instrument used for calculating the hedge effectiveness for 2019**	**Ineffectiveness recognised in the income statement for 2019**	**Line item in the Income statement that included hedge ineffectiveness**
		Assets	**Liabilities**				
Interest rate risk							
Covered bond issued by the Bank terminated relationship					2,727	(15)	Gains less losses on financial transactions
Targeted long-term refinancing operations ECB (TLTRO) terminated relationship					363	41	
Corporate loan	Interest rate swap		74	Derivatives	11		
Greek Government bonds of a nominal value of € 720m			323,227		39,776	3,795	
Fixed-rate retail loans		844			852	(36)	
Foreign currency risk							
Investment in Alpha Bank London in GBP	Foreign exchange swap)	71		Derivatives	(2,815)		Gains less losses on financial transactions
Investment in Alpha Bank Romania in RON		19	102		3,989		

The amounts related to balance sheet items designated as hedged items are analyzed as follows:

2020						
Hedging relationship	**Carrying Amount**		**Accumulated amount of fair value hedge adjustments on the hedged item**		**Line item in the balance sheet where the hedged item is included**	**Change in fair value of hedged item used for calculating the hedge effectiveness in 2020**
	Assets	**Liabilities**	**Assets**	**Liabilities**		
Interest rate risk						
Greek Government bonds portfolio Nominal value € 800 m	1,201,665		9,607		Investment securities – Measured at amortized cost	9,607
Greek Government bonds portfolio nominal value € 58 m	59,046		262		Investment securities – Measured at amortized cost	262
Tier II Bond issued by the Bank		518,583	-	(4,161)	Debt securities in issue and other borrowed funds	(4,161)
Fixed rate retail loans	451,193		1,193		Loans and advances to customers	2,081
Foreign currency risk						
Investment in Alpha Bank London in GBP	54,503		1,180		Investments in subsidiaries, associates and joint ventures	(3,090)

422 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

2019						
Hedging relationship	Carrying Amount		Accumulated amount of fair value hedge adjustments on the hedged item		Line item in the balance sheet where the hedged item is included	Change in fair value of hedged item used for calculating the hedge effectiveness
	Assets	Liabilities	Assets	Liabilities		
Interest rate risk						
Greek Government bonds portfolio nominal amount € 720 m	917,027		(35,981)		Investment securities – Measured at fair value through other comprehensive income	(35,981)
Fixed rate retail loans	449,112		(888)		Loans and advances to customers	(888)
Corporate loan	21,572		74		Loans and advances to customers	(11)
Foreign currency risk						
Investment in Alpha Bank London in GBP	57,593		4,270		Investments in subsidiaries, associates and joint ventures	2,815
Investment in Alpha Bank Romania in RON	155,671		(25,937)		Assets held for sale	(3,989)

The amounts related to balance sheet items, whose hedging relationship has been terminated during the year 2020 and 2019 are analyzed as follows:

2020						
Hedging relationship	Carrying amount of item for which the hedging relationship has been terminated		Accumulated amount of fair value of item for which the hedging relationship has been terminated		Line item in the balance where the item is included	Change in fair value of hedged item used for calculating the hedge effectiveness in 2020
	Assets	Liabilities	Assets	Liabilities		
Interest rate risk						
Greek Government bonds portfolio nominal amount € 720 m	259,949		(1,531)		Investment securities – Measured at fair value through other comprehensive income	28,960
Greek Government bonds portfolio nominal amount € 667 m	127,168		2,507		Investment securities – Measured at amortized cost	14,138
Corporate loan					Loans and advances to customers	(74)

423 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

2019						
Hedging relationship	**Carrying amount of item for which the hedging relationship has been terminated**		**Accumulated amount of fair value of item for which the hedging relationship has been terminated**		**Line item in the balance where the item is included**	**Change in fair value of hedged item used for calculating the hedge effectiveness in 2019**
	Assets	**Liabilities**	**Assets**	**Liabilities**		
Interest rate risk						
Covered bond issued by the Bank terminated relationship		514,317		8,871	Debt securities in issue and other borrowed funds	(2,742)
Targeted long-term refinancing operations ECB (TLTRO) terminated relationship		996,198		3,210	Due to banks	(322)

b. Cash flow hedges

In regards to cash flows hedging relationships, the Bank determines the referenced interest rate associated with the hedged risk (Euro rate) at inception of the hedging relationship and measures the changes in the fair value of the hedging instrument and a hypothetical derivative relating to Euro interest rate curve changes.

The floating leg of the hypothetical derivative replicates the cash flows of the hedged item, whereas the fixed leg cash flows are determined so that the hypothetical derivative has a value equal to zero at inception. In order to measure the effectiveness of the hedge, the changes of the hypothetical derivative are compared to the changes of the hedged item, and in order for the hedge to qualify as effective the ratio of the change in the fair value of the hypothetical derivative over the change in the fair values of the hedged item should be between 80% - 125% (dollar offset method).

The Bank has identified the following sources that may lead to ineffective hedging:

a) Credit risk of the derivative counterparty, which is not offset by the hedged item. The Bank minimizes counterparty credit risk in derivative instruments by entering into transactions with counterparties which are also covered with collateral agreements.

b) Difference in timing of cash flows of hedged items and hedging instruments.

No other sources of ineffectiveness were identified during the year.

As at 31.12.2020 there are no cash flow hedging relationships in effect.

424 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The balance sheet and the income statement amounts relating to cash flow hedging instruments and the effectiveness of the hedging as at 31.12.2020 and 31.12.2019 are analyzed as follows:

2020										
Hedging relationship	Type of derivative	Carrying amount of hedged item		Change in fair value of hedging instrument used for calculating hedge effectiveness for the year 2020	Change in the fair value of the hedging instrument recognized in the cash flow hedge reserve for the year 2020	Change in the fair value of the hedging instrument recognized in the income statement for the year 2020	Line item in the income statement category affected by the reclassification	Ineffectiveness recognised in the income statement for the year 2020	Line item in the income statement that includes hedge ineffectiveness	Amount reclassified from the cash flow hedge reserve to the income statement in 2020 from hedging relationship that have been terminated	Line item in the income statement affected by hedging relationships that have been terminated
		Assets	Liabilities								
Interest Rate Risk											
Term deposits and renewals	Interest rate swap									(20,841)	Net interest income

2019										
Hedging relationship	Type of derivative	Carrying amount of hedging instrument		Change in fair value of hedging instrument used for calculating hedge effectiveness for the year 2019	Change in the fair value of the hedging instrument recognized in the cash flow hedge reserve for the year 2019	Change in the fair value of the hedging instrument recognized in the income statement for the year 2019	Line item in the income statement category affected by the reclassification	Ineffectiveness recognised in the income statement for the year 2019	Line item in the income statement that includes hedge ineffectiveness	Amount reclassified from the cash flow hedge reserve to the income statement in 2019 from hedging relationship that have been terminated	Line item in the income statement affected by hedging relationships that have been terminated
		Assets	Liabilities								
Interest rate risk											
Term deposits and renewals	Interest rate swap			(153,806)	(139,458)	(14,220)	Net interest income	(128)	Gains less losses on financial transactions	(9,004)	Net interest income

425 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Amounts recognized in the cash flow hedge reserve as at 31.12.2020 and 31.12.2019 are analyzed as follows:

31.12.2020				
	Line item in the balance sheet where the hedged item is included	Cash flow hedge reserve (before tax) from existing hedging relationships	Cash flow hedge reserve (before tax) from discontinued hedging relationships	Cash flow hedge reserve (before tax)
Interest rate risk				
Term deposits in Euro	Due to customers	-	(315,029)	(315,029)

31.12.2019				
	Line item in the balance sheet where the hedged item is included	Cash flow hedge reserve (before tax) from existing hedging relationships	Cash flow hedge reserve (before tax) from discontinued hedging relationships	Cash flow hedge reserve (before tax)
Interest rate risk				
Term deposits in Euro	Due to customers	-	(335,871)	(335,871)

19. Loans and advances to customers

	31.12.2020	31.12.2019
Loans measured at amortized cost	42,176,090	41,376,995
Leasing	6,970	9,593
Less: Allowance for expected credit losses	(7,468,522)	(7,069,690)
Total	**34,714,538**	**34,316,898**
Advances to customers measured at amortized cost	262,201	221,972
Advances to customers measured at fair value through profit or loss	40,000	
Loans to customers measured at fair value through profit or loss	264,068	315,932
Loans and advances to customers	**35,280,807**	**34,854,802**

As at 31.12.2020, the caption Advances to customers measured at amortised cost includes allowance for expected credit losses amounting to € 36,995 (31.12.2019: € 32,349).

The advances from customers measured at amortized cost on 31.12.2020 include the net receivable consideration amounting to € 105,692 from the sale of the non-performing loan portfolio completed on 17.7.2020, as further detailed in note 44, which is expected to be settled in cash within 3 years from the closing of the transaction. In addition, Advances from customers measured at fair value through profit or loss includes the fair value of receivable from variable payment of the abovementioned transaction for which the fair value was estimated at 31.12.2020 to € 40,000.

426 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The tables below present an analysis of the loan portfolio per type:

Loans measured at amortised cost

	31.12.2020	31.12.2019
Individuals		
Mortgages:		
- Non-securitized	9,667,843	14,236,423
- Securitized	4,154,486	
Consumer:		
- Non-securitized	1,520,893	3,037,917
- Securitized	2,121,090	645,947
Credit cards:		
- Non-securitized	421,755	683,825
- Securitized	717,543	576,367
Total loans to individuals	**18,603,610**	**19,180,479**
Corporate:		
Corporate loans		
- Non-securitized	17,876,726	19,780,061
- Securitized	5,695,754	2,416,455
Leasing		
- Non-securitized	6,970	9,593
Total corporate loans	**23,579,450**	**22,206,109**
Total	**42,183,060**	**41,386,588**
Less: Allowance for expected credit losses	(7,468,522)	(7,069,690)
Total loans measured at amortized cost	**34,714,538**	**34,316,898**

In the context of the reassessment of the hold to collect business model of loans and advances to customers, past sales are taken into account.

Considering that:

- the majority of the Bank's sales are in accordance with the Bank's business model as they concern sales of non-performing loans due to the credit rating deterioration of the debtor and
- individual sales are not considered material both individually and in aggregate,

the Bank has assessed that the sales are consistent with the existing business model for loans and advances to customers.

On 30.4.2020 the Bank completed, in accordance with the provisions of article 10 of Law 3156/2003, the procedures for the securitization of loans receivables and / or consumer, mortgage and corporate credits to special purpose entities of Law 3156/2003, established in the Republic of Ireland. This transaction is part of the strategic plan 2020-2022, as described in note 48.

In particular, the Bank transferred loan portfolios to four special purpose entities set up for this purpose, which in turn issued bonds. The Bank acquired those bonds and maintained in all cases the risks and rewards deriving from the securitized portfolios, and has not derecognized the loans.

The carrying amount of the securitized loans at amortised cost of the above transaction amounted to € 6,043,792 as at 31.12.2020.

Furthermore, in previous years, the Bank has proceeded with the securitization of other consumer and corporate loans and credit cards through controlled special purpose entities. Based on the contractual terms and structure of the above transactions (e.g. guarantees or/and credit enhancement or due to the Bank owes the notes issued by the special purpose entities), the Bank retained in all cases the risks and rewards deriving from securitized portfolios.

427 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Mortgage loans as at 31.12.2020 include loans amounting to € 3,138,839 which have been used as collateral in the Covered Bond Issuance Program I and Covered Bond Issuance Program II of the Bank, As at 31.12.2019 loans with carrying amount of € 4,421,909 had been used as collateral in the Covered Bond Issuance Program I, Covered Bond Issuance Program II and Secured Note Program.

According to the Business Plan relating to the management of Non Performing Exposures, that the Bank submitted on 05 October 2020 and has been prepared in accordance with the methodology and models of the supervisory authorities, the Bank is obliged to monitor and report to the SSM the level of the achievement of the targets set in the Business Plan on a consolidated basis, until the end of 2022, through relevant supervisory reports. As at 31.12.2020, the balance of the NPE loans included in total loans and advances to customers amounted to € 20,9 billion (31.12.2019: € 21,8 billion).

The carrying amount of loans guaranteed by the Guarantee Fund Covid-19 and with interest rate subsidy from the Entrepreneurship Fund II of the Hellenic Development Bank amounts to € 1,399,143 on 31.12.2020 and is included in the balance of loans measured at amortized cost. For the above loans the allowance for expected credit losses recognized as at 31.12.2020 amounts to € 4,546.

The movement of allowance for expected credit losses on loans, that are measured at amortized cost, is presented below:

Allowance for expected credit losses

Balance 1.1.2019	**8,843,992**
Changes for the year 1.1 - 31.12.2019	
Impairment losses for the year	816,190
Transfer of allowance for expected credit losses to Assets held for sale	(1,092,194)
Derecognition due to substantial modifications in loans contractual terms	(41,035)
Change in present value of the impairment losses	(13,145)
Foreign exchange differences	1,799
Disposals of impaired loans	(90,177)
Loans written-off during the year	(1,343,752)
Other movements	(11,988)
Balance 31.12.2019	**7,069,690**
Changes for the year 1.1 - 31.12.2020	
Impairment losses for the year	1,085,080
Transfer of allowance for expected credit losses to Assets held for sale	
Derecognition due to substantial modifications in loans contractual terms	(6,749)
Change in present value of the impairment losses	68,666
Foreign exchange differences	(4,835)
Disposals of impaired loans	(573)
Loans written-off during the year	(685,144)
Other movements	(57,613)
Balance 31.12.2020	**7,468,522**

Impairment losses" for 2020, does not include impairment loss of € 22,209 (31.12.2019: € 77,479) which relates to impairment losses for loans classified as held for sale and the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) which is included in the carrying amount of the loans.

"Other movements" for the year 2020 includes mainly an amount of € 58,691 concerning impairment reversal of subsidiary's loan AGI Cypre Ermis Ltd which was reclassified to allowance for expected credit losses of investments in subsidiaries in the context of Bank's participation in the share capital increase of the subsidiary and the repayment of the loan to the Bank (note 21).

428 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Finance lease receivable are analyzed by duration as follows:

	31.12.2020	31.12.2019
Up to 1 year	1,236	1,242
From 1 year to 5 years	4,604	5,899
Over 5 years	1,828	3,928
	7,668	**11,069**
Non accrued finance lease income	(698)	(1,476)
Total	**6,970**	**9,593**

The net amount of finance lease receivables are analyzed as follows, based on their duration:

	31.12.2020	31.12.2019
Up to 1 year	1,054	1,226
From 1 year to 5 years	4,174	5,379
Over 5 years	1,742	2,988
Total	**6,970**	**9,593**

It is noted that the reduction in receivables from finance leases amounts to € 1,531 due to a sublease modification (reduction in duration) which resulted in the discounting of new cash flows at the initial IBR rate and the difference from the carrying amount to be recognized as impairment loss.

There has been no significant impact from the application of the rent concession measures on the receivable from finance leases.

Loans to customers measured at fair value through profit or loss

	31.12.2020	31.12.2019
Individuals:		
Consumer:		
- Non-securitized		451
Total loans to individuals	**-**	**451**
Corporate:		
Corporate loans		
- Non-securitized	159,528	299,520
- Securitized	104,540	15,961
Total corporate loans	**264,068**	**315,481**
Total loans measured at fair value through profit or loss	**264,068**	**315,932**

As at 31.12.2020, securitized loans amounting to € 104,540 are included in the securitization transaction of loan receivables and/or consumer, mortgage and corporate credits, as detailed described in note 48.

20. Investment securities

	31.12.2020	31.12.2019*
Investment Securities measured at fair value through other comprehensive income	5,170,579	6,194,015
Investment Securities measured at fair value through profit or loss	218,317	217,512
Investment Securities measured at amortized cost	3,160,121	1,070,730
Total	**8,549,017**	**7,482,257**

An analysis of investment securities is provided in the following tables per classification category and per type of security.

* Certain figures of the previous year have been restated as described in note 47.

429 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

a. Securities measured at fair value through other comprehensive income

	31.12.2020	31.12.2019*
Greek Government		
- Bonds	1,554,211	3,316,413
- Treasury bills	732,778	207,966
Other Governments		
- Bonds	1,258,925	1,419,828
Other issuers		
- Listed	1,600,658	1,211,967
- Non listed	3,546	12,866
Equity securities		
- Listed	13,031	9,529
- Non listed	7,430	15,446
Total	**5,170,579**	**6,194,015**

Investment portfolio equity securities measured at fair value through other comprehensive income

The Bank has made the irrevocable election on initial recognition to measure at fair value through other comprehensive income equity instruments that have the following characteristics:

a) Shares in companies of the financial sector (credit institutions and interbank companies)

b) Investments in private equity (shares of venture capital or private equity) and

c) Share held in long term investment horizon

The following table presents the shares of investment portfolio measured at fair value through other comprehensive income as of 31.12.2020 and as of 31.12.2019.

	Fair value 31.12.2020	Dividend income from 1.1 to 31.12.2020	Fair value 31.12.2019*	Dividend income from 1.1 to 31.12.2019*
Investments in financial industry entities	417	160	8,712	176
Long term equity holdings	20,044	1,674	16,263	241
Total	**20,461**	**1,834**	**24,975**	**417**

The Bank, from 1.1.2019, retrospectively adjusted VISA Inc shares from the securities at fair value through other comprehensive income directly in equity to the securities valued at fair value through other comprehensive income as detailed described in note 47.

Within the year 2020, for liquidity reasons, the Bank proceeded with the disinvestment of shares held in V TELECOM INVESTMENTS SCA and V TELECOM INVESTMENT GEN PARTNER SA, with a total fair value of € 478 at the date of sale. From the aforementioned sales, no result was recognized.

In addition, in 2020 the Bank proceeded with the divestment of shares held to Mastercard, following the participation in the Open Conversion and Sale Program announced by the company, according to which the right to convert Class B shares of the Bank with issued traded Class A shares was exercised. The issued Class A shares, which were classified in the category of shares valued at fair value through profit or loss, were sold within the year and the result from the initial recognition and the sale of shares was recognized in gains less losses on financial transactions (note 5).

Finally, the full acquisition of Cepal Holdings by the Bank on 22.7.2020 led to the reclassification of the Bank's holding of preferred shares of € 14,100 under the subsidiaries category, as described in note 21.

The Bank during 2019, either for liquidity purposes or due to squeeze out, proceeded with the disinvestment of shares held in Piraeus Bank and in Pillarstone Bidco SCA with total fair value amounted to € 63. The above sales resulted in a loss of € 0.1, compared to their initial cost of acquisition.

* Certain figures of the previous year have been restated as described in note 47.

430 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

b. Securities measured at fair value through profit or loss

	31.12.2020	31.12.2019*
Other issuers		
- Listed	167,209	178,088
- Non listed	1,674	1,790
Equity securities		
- Non listed	27,337	9
Other variable yield securities	22,097	37,625
Total	**218,317**	**217,512**

Investment Securities measured at fair value through profit or loss include securities for which it was assessed that their contractual cash flows do not meet the solely payments of principal and interest (SPPI) criterion in of IFRS 9 as well as reclassified in this category.

c. Securities measured at amortized cost

	31.12.2020	31.12.2019
Greek Government		
- Bonds	2,779,179	1,070,730
- Treasury bills		
Other Governments		
- Bonds	349,973	
Other issuers		
- Listed	30,969	
- Non listed		
Total	**3,160,121**	**1,070,730**

The Bank classified in “Securities measured at amortized cost” Greek Government bonds acquired in 2019 as the original assessment of their business model expected to hold to maturity given the satisfactory level of yields. During 2020 following new purchases the balance of the portfolio increased to € 2,089,391, as described in note 6. For the above investment securities measured at amortized cost, allowance for expected credit losses amounts to of € 10,172 (31.12.2019: € 7,413). Their gross carrying amount amounts to € 3,170,293 (31.12.2019: € 1,078,143).

* Certain figures of the previous year have been restated as described in note 47.

431 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

21. Investments in subsidiaries, associates and joint ventures

	31.12.2020	31.12.2019
SUBSIDIARIES		
Opening balance	**910,944**	**854,872**
Additions	1,919,633	108,151
Decreases	(366,136)	(54,894)
Transfer from associates	5,515	
Transfer from equity securities measured at fair value through other comprehensive income	14,100	
Valuation of investments due to fair value hedge*	(3,089)	2,815
Closing balance	**2,480,967**	**910,944**
ASSOCIATES		
Opening balance	**5,873**	**5,751**
Additions		122
Decreases	(122)	
Transfer to subsidiaries	(5,515)	
Closing balance	**236**	**5,873**
JOINT VENTURES		
Opening balance	**2,940**	**3,108**
Additions	559	137
Decreases		(305)
Transfer due to reclassification from assets held for sale	3,917	
Closing balance	**7,416**	**2,940**
Total	**2,488,619**	**919,757**

Additions represent: Amounts paid for the establishment of new entities, share purchases, participation in share capital increases and acquisitions of shares due to mergers and other capital transactions under the stock option rights.

Decreases represent: sales of shares, return of capital, proceeds arising from the liquidation of companies, impairments and the decrease in the cost of the subsidiaries due to in the context of the reorganization of the subsidiaries.

The additions in subsidiaries amounting to € 1,919,633 and the and transfers amounting to € 19,615 relate to:

a. share capital increase:

- share capital increase of the subsidiary Alpha Group Investments Ltd amounting to € 107,899.
- share capital increase of the subsidiary AGI-CYPRE Ermis Ltd amounting to € 150,000.

  The company was reclassified from "Assets held for sale" to "Investments in subsidiaries, associates and joint ventures" as the criteria under IFRS 5 for the classification to this caption are no longer met as described in note 44.
- share capital increase of the subsidiary Alpha Holdings MAE amounting to € 197,304
- share capital increase of the subsidiary APE Fixed Assets amounting to € 585.

b. Establishment of new entities:

In the context of securitization of non-performing loans of the Bank in the first half of 2020 (Project Galaxy), the following special purpose entities were established in Ireland, to which the Bank has transferred the respective non-performing loans:

- Orion X Securitisation DAC
- Galaxy II Funding DAC
- Galaxy III Funding DAC and
- Galaxy IV Funding DAC

Despite the fact that the Bank does not participate in the share capital of the above special purpose entities, from the examination of the contractual terms and the structure of the securitization transaction, it appears that the special purpose entities are controlled by the Bank and therefore represent Bank's subsidiaries.

* The Bank uses FX swaps and money market loans to hedge the foreign exchange risk of its investments in subsidiaries abroad.

432 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

In addition, the following companies have been established, with the purpose to acquire real estate from auction (as well as their management) which are collaterals of the securitized loans:

- Reoco Galaxy II MON. S.A. with cash contribution of € 50.
- Reoco Galaxy IV MON. S.A. with cash contribution of € 50.
- Reoco Orion X MON. S.A. with a cash contribution of € 50.

Finally, in the context of the restructuring of the Bank's subsidiaries, Alpha International Holdings M.A.E. was established with an initial share capital of € 1,280,000, paid in cash, aiming to acquire the Group's financial institutions in Eastern Europe and the credit acquisition subsidiary, Alpha Credit Acquisition Company Ltd.

c. Acquisition of control:

On 22.7.2020, the Bank acquired remaining shareholding of Cepal Holding Societe Anonyme ("Cepal Holdings"), pursuant to the exercise of the put option by Centerbridge on 1.7.2020, for a consideration of € 35,963. The Bank's participation in the company through ordinary shares of € 5,515 and preferred shares of to € 14,100 were classified as investment in subsidiaries. The acquisition cost of the Bank's participation through ordinary shares also includes the value of the share options amounting to € 560.

On 27.11.2020 the Bank proceeded to the increased of its share capital by of € 147,000 (note 32).

d. Granting of stock options

In the context of the implementation of the stock option plan of the Bank for employees of the Bank and its connected entities, as detailed in note 8, the cost of the Bank's participation in the subsidiaries Alpha Holdings MAE, Alpha Support Labor SA, Alpha Real Estate and Investment Management, Alpha Group Investments LTD and Alphalife AEAZ, increased by a total amount of € 172 which corresponds to the fair value of the rights granted to employees of the above companies or their subsidiaries considering that the reward provided by the Bank through options rights is recognized as expense for the subsidiary while for the Bank is presented as an increase in the participation considering that it represents an indirect capital injection.

Decreases of subsidiaries amounting to € 366,136 relates to:

a. Impairments amounting to € 167,079 relating to:

- impairment of the subsidiary Alpha Group Investments Ltd amounting to € 16,732. The recoverable amount of Alpha Group Investments Ltd amounted to € 446,906
- impairment of the subsidiary Alpha Group Jersey Limited amounting to € 182. The recoverable amount of Alpha Group Jersey Limited amounted to € 369
- impairment of the subsidiary Emporiki Management and Liquidation amounting to € 64. The recoverable amount of Emporiki Management and Liquidation amounted to € 3,209
- impairment of the subsidiary Alpha International Holdings Company S.A. amounting to € 69. The recoverable amount of Alpha International Holdings Company amounted to € 131
- impairment of the subsidiary AGI-Cypre Ermis amounting to € 150,000 of which the amount of € 58,691 was transferred from the accumulated loan impairments to the accumulated impairments to subsidiaries, as mentioned in note 19. The recoverable amount of AGI-Cypre Ermis amounted of € 0.
- impairment of the subsidiaries Reoco Galaxy II MON. S.A. amounting to € 10, REOCO GALAXY IV MON. SA amounting to € 11, Reoco Galaxy X MON. S.A. amounting to € 11. The recoverable amount of the above companies amounted to € 40, € 39 and € 39 respectively.

The impairments of the aforementioned subsidiaries were based on fair value estimates. The valuations were classified under Level 3 of the fair value hierarchy, as unobservable inputs were used for their valuation. The impairments are included in the operating segment "Other/Elimination center" of the note 39 " Operating segments ".

b. Transfer of entities amounting in total of € 593

As part of the restructuring plan of the subsidiaries, on 28.12.2020, the transfer of all the shares of Alpha Credit Acquisition Company Ltd, with a book value of € 593, to Alpha International Holdings M.A.E. with a payment amounting to € 3,482 was completed. The outcome from the transfer amounting to € 2,888 was included in the reduction of the participation to Alpha International Holdings M.A.E. as described below.

c. Decreases in participation costs under the subsidiaries' restructuring plan

The Bank implemented the restructuring plan of its subsidiaries by proceeding with the transfer of companies a) to its subsidiary Alpha Holdings M.A.E. b) to its subsidiary Alpha International Holdings M.A.E. and c) to Alpha Group Investments Ltd, as detailed described in note 44.

The outcome of the transfer resulted from the difference between the carrying amount of the subsidiaries and the transfer consideration. However, in cases where the Bank financed the acquisition of a subsidiary by an intermediary holding companies either through a share capital increase (Alpha Holdings MAE) or through the payment of initial share capital (Alpha International Holdings MAE), the outcome from the transfer was not recognized in the results but reduced the cost of the participation of the Bank in these intermediary holding companies by the amount of € 198,464.

d. Liquidation of entities

On 28.12.2020 the liquidation of the subsidiary company METEK Bank SA was completed, which had a carrying amount of € 0.

Reductions in associates relate to impairment of the participation to the entity Olganos Property S.A. amounting of € 122 and to the transfer of the participation of the Bank to Cepal Holdings though ordinary shares amounting of € 5,515 following the acquisition from the Bank.

The additions of the joint ventures amounting to € 559 relate to the share capital increase of Alpha Taneo AKES and to the reclassification of APE Commercial Property S.A. as the criteria to be classified to "Assets held for Sale" under IFRS 5 are no longer met, as described in note 44. The recoverable value amounted to € 3,917.

Key financial information of investments

a. Subsidiaries

		Balance 31.12.2020			1.1 - 31.12.2020		
Name	**Country**	**Assets**	**Equity**	**Liabilities**	**Turnover**	**Profit/(Loss) before taxes**	**Bank's ownership interest % 31.12.2020**
Banks							
1. Alpha Bank London Ltd	United Kingdom	661,116	60,939	600,177	17,543	1,667	100.00
2. Alpha Bank Cyprus Ltd	Cyprus				77,568	(69,108)	
3. Alpha Bank Romania S.A.	Romania				170,879	18,652	
4. Alpha Bank Albania Sh.A.	Albania	624,776	74,528	550,248	23,452	1,246	100.00
Leasing companies							
1. Alpha Leasing A.E.	Greece				14,279	(15,883)	
2. Alpha Leasing Romania IFN S.A.	Romania	45,293	1,410	43,883	2,361	118	99.00
3. ABC Factors A.E.	Greece				23,725	11,196	
4. Cepal Hellas Holdings S.A.	Greece	310,052	159,200	150,852	20,828	(2,338)	100,00
Investment Banking							
1. Alpha Finance A.E.P.E.Y.	Greece				10,151	1,815	
2. SSIF Alpha Finance Romania S.A.	Romania	266	238	28	534	109	73.32
3. Emporiki Ventures Capital Emerging Markets Ltd	Cyprus				(401)	(429)	
Asset Management							
1. Alpha Asset Management A.E.D.A.K.	Greece				18,399	4,409	
Insurance							
1. Alpha Insurance Agents S.A.	Greece	1,976	1,741	235	815	662	100.00
2. Alphalife A.A.E.Z.	Greece	650,742	111,080	539,662	23,382	11,824	99.92
Real Estate and Hotel							
1. APE Fixed Assets S.A.	Greece	39,784	39,615	169		(314)	72.20
2. Alpha Investment Property Attikis SA	Greece					(97)	
3. Alpha Investment Property Attikis II SA	Greece	23,647	21,635	2,012	1,057	(308)	99.74
4. REOCO ORION X M.A.E	Greece	49	34	15		(16)	100.00
5. REOCO GALAXY II M.A.E.	Greece	49	34	15		(16)	100.00
6. REOCO GALAXY IV M.A.E.	Greece	49	34	15		(16)	100.00
Special purpose and holding entities							
1. Alpha Credit Group Plc	United Kingdom	614	588	26	(19)	(99)	100.00
2. Alpha Group Jersey Ltd	Jersey	6,617	369	6,248	(3)	(158)	100.00
3. Alpha Group Investments Ltd	Cyprus	610,148	610,086	62	(1,978)	(2,128)	100.00
4. Alpha Real Estate Management and Investments S.A.	Greece	351,919	349,780	2,139	4,104	1,885	100.00
5. Katanalotika Plc	United Kingdom	589,253	86	589,167	152,551	149,496	
6. Epihiro Plc	United Kingdom	1,619,479	28	1,619,451	3,077	6	
7. Pisti 2010-1 Plc	United Kingdom	613,490	51	613,439	12,335	5	
8. Alpha Group Ltd	Cyprus	20	2	18	70	46	100.00
9. Alpha Shipping Finance Ltd	United Kingdom	194,666	(407)	195,073	6,007	43	
10. AGI-Cypre Ermis Ltd	Cyprus	793,289	11,616	781,673	17,103	(82,226)	99.00
11. Alpha Proodos DAC	Ireland				2,689		

The amounts are presented in thousands of Euro unless otherwise indicated

		Balance 31.12.2020			1.1 - 31.12.2020		
Name	Country	Assets	Equity	Liabilities	Turnover	Profit/(Loss) before taxes	Bank's ownership interest % 31.12.2020
12. Alpha Credit Acquisition Company Ltd	Cyprus				5,077	1,730	
13. Alpha International Holding Company S.A.	Luxembourg	140	131	9		(69)	100.00
14. Alpha International HoldingsM.A.E	Greece	1,278,350	1,278,318	32	110	(551)	100.00
15. Alpha Holdings M.A.E.	Greece	465,888	465,769	119	1	(1,511)	51.00
Other companies							
1. Kafe Alpha S.A.	Greece	555	365	190	199	(12)	99.00
2. Alpha Supporting Services S.A.	Greece	75,459	70,082	5,377	9,923	(891)	99.00
3. Emporiki Management S.A.	Greece	3,348	3,217	131	59	(155)	99.65

b. Associates

		Balance 31.12.2020			1.1 - 31.12.2020		
Name	Country	Assets	Equity	Liabilities	Turnover	Profit/(Loss) before taxes	Bank's ownership interest % 31.12.2020
1. AEDEP Thessalias and Stereas Ellados	Greece	479	146	333	660		50.00
2. Bank Information Systems S.A.	Greece	6,811	683	6,128	12,986	(445)	23.77
3. Olganos S.A.	Greece	8,508	(1,533)	10,041	1	(362)	30.44
4. Famar S.A.	Luxemburg	4	4				47.04

c. Joint Ventures

		Balance 31.12.2020			1.1 - 31.12.2020		
Name	Country	Assets	Equity	Liabilities	Turnover	Profit/(Loss) before taxes	Bank's ownership interest % 31.12.2020
1. APE Commercial Property SA	Greece	5,657	5,628	29		(18)	72.20
2. APE Investment Property SA	Greece	203,574	133,661	69,913	5,830	(1,003)	71.08
3. Alpha TANEO A.K.E.S.	Greece	8,128	7,401	727	104	(20)	51.00

The amounts are presented in thousands of Euro unless otherwise indicated

22. Investment property

	Land and Buildings	Right-of-use on Land and Buildings	Total
Balance 1.1.2019			
Cost	41,938		41,938
Accumulated depreciation and impairment losses	(17,380)		(17,380)
1.1.2019 - 31.12.2019			
Impact from the implementation of I.F.R.S. 16		**20,011**	**20,011**
Net book value 1.1.2019	**24,558**	**20,011**	**44,569**
Additions			
(Impairments)/Reversal of impairments		1,055	1,055
Reclassification from "Property, Plant and Equipment"	6,088		6,088
Reclassification to "Property, Plant and Equipment"		(10,271)	(10,271)
Reclassification to "Assets held for sale"	(84)		(84)
Depreciation charge for the year	(328)	(1,350)	(1,678)
Net book value 31.12.2019	**30,234**	**9,445**	**39,679**
Balance 31.12.2019			
Cost	47,926	10,765	58,691
Accumulated depreciation and impairment losses	(17,692)	(1,320)	(19,012)
1.1.2020 - 31.12.2020			
Net book value 1.1.2020	**30,234**	**9,445**	**39,679**
Additions			
Disposals / Write-offs / Terminations / Reassessment		(11,370)	(11,370)
(Impairments)/Reversal of impairments	(998)	8,852	7,854
Reclassification from "Property, Plant and Equipment"	12,116		12,116
Reclassification from "Other Assets"	40		40
Reclassification to "Assets held for sale"	(435)		(435)
Depreciation charge for the year	(403)	(822)	(1,225)
Net book value 31.12.2020	**40,554**	**6,105**	**46,659**
Balance 31.12.2020			
Cost	66,211	8,649	74,860
Accumulated depreciation and impairment losses	(25,657)	(2,544)	(28,201)

The fair value of the investment on land and buildings as at 31.12.2020 amounts € 41,789 (31.12.2019: € 30,421).

In 2020, impairment loss was recognized for Land and Buildings € 998 (31.12.2019: € 0), where the carrying amount exceed their recoverable amount as at 31.12.2020, as the latter was estimated by certified property valuers. The recoverable amount of the investment property which was impaired during the year 2020 amounted to € 9,285. The recoverable amount of these investment properties was determined as their fair value less costs to sell. The fair value of the investment property is calculated in accordance with the methods described in note 1.2.6. and are classified, in terms of fair value hierarchy, in Level 3 since assumptions and inputs relating to properties of relevant characteristics are used for the determination of fair value and therefore encompass a wide range of unobservable market inputs. The capitalization rate used ranges between 6.5% and 8%.

It is noted that further to an updated report obtained by the competent divisions of the Bank relating to the effect of Covid-19 on the values of real estate properties in Greece and based on the assumptions of the basic scenario relating to the evaluation of the pandemic and its effect on the values of the properties, and considering recent data from realized property sales by the Group to third parties, it is estimated that these values have not been affected by the pandemic in order to merit further impairment in the fair values.

In 2020, the bank transferred own use assets of € 12,116 to “Investment properties”, which mainly concern properties leased to third parties.

In 2020, the Bank transferred investment property of € 435 (31.12.2019: € 84) to “Assets classified as held for sale” as presented in Note 44.

437 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Following the implementation of IFRS 16, effective from 1.1.2019, the Bank recognized a right-of-use on Land and Buildings amounting to € 20,011, related to real estate leases, recognized as investment property, since they are subleased under operating lease agreements.

With regards to the right-of-use assets, in the year 2020, impairment losses of € 623 (31.12.2019: € 449) were recognized as well as a reversal of the impairment amounting to € 9.475 (31.12.2019: € 1.504) was included in "Other Expenses". The recoverable amount of right –of-use assets on buildings is equal to the discounted value of the rental receivables from subleases.

The Bank, as a lessor of properties owned by third parties, recognizes rental income in the results of the year. The future income from operating leases are as follows:

	31.12.2020	31.12.2019
Up to 1 year	4,714	3,586
From 1 year to 5 years	9,797	10,612
Over 5 years	1,634	3,787
Total	**16,145**	**17,985**

Future income from operating leases are disclosed in note 19.

The total income from operating leases for the year 2020 amounted of € 3,916 (31.12.2019: € 4,390) and are included in "Other income".

The Bank as a lessor did not have material impact from the implementation of the lease concession measures which amounted of € 767.

438 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

23. Property, plant and equipment

	Land and Buildings	Equipment	Rights-of-use on fixed assets	Total
Balance 1.1.2019				
Cost	932,696	389,014		1,321,710
Accumulated depreciation and impairment losses	(370,836)	(321,980)		(692,816)
1.1.2019 - 31.12.2019				
Impact from the implementation of I.F.R.S. 16			**94,911**	**94,911**
Net book value 1.1.2019	**561,860**	**67,034**	**94,911**	**723,805**
Additions	8,898	26,517	15,138	50,553
Impairments	(1,164)		(3,947)	(5,111)
Disposals / Write-offs / Terminations / Reassessment	(905)	(15)	(9,411)	(10,331)
Reclassification from "Investment Property"			10,271	10,271
Reclassification to "Investment Property"	(6,088)			(6,088)
Reclassification to "Other Assets"	(2,901)			(2,901)
Reclassification from "Other Assets""	143			143
Reclassification to "Assets held for sale"	(9,920)			(9,920)
Depreciation charge for the year	(14,993)	(15,574)	(22,395)	(52,962)
Net book value 31.12.2019	**534,930**	**77,962**	**84,567**	**697,459**
Balance 31.12.2019				
Cost	903,008	413,297	110,755	1,427,060
Accumulated depreciation and impairment losses	(368,078)	(335,335)	(26,188)	(729,601)
1.1.2020 - 31.12.2020				
Net book value 1.1.2020	**534,930**	**77,962**	**84,567**	**697,459**
Additions	7,012	18,804	2,946	28,762
(Impairments)/Reversal of impairments	(10,415)		3,683	(6,732)
Disposals / Write-offs /Terminations / Reassessment	(751)	(103)	(1,598)	(2,452)
Reclassification to "Investment Property"	(12,116)			(12,116)
Reclassification to "Other Assets"	(837)			(837)
Reclassification to "Assets held for sale"		(324)		(324)
Depreciation charge for the year	(14,223)	(24,997)	(22,159)	(61,379)
Net book value 31.12.2020	**503,600**	**71,342**	**67,439**	**642,381**
Balance 31.12.2020				
Cost	874,263	428,541	113,465	1,416,269
Accumulated depreciation and impairment losses	(370,663)	(357,199)	(46,026)	(773,888)

The carrying amount of owned land and buildings included in the above balances is € 489,110 (31.12.209: € 518,988) as at 31.12.2020.

For the year 2020, an impairment loss of € 10,415 (31.12.2019: € 1,164) was recognized for land and buildings. The recoverable amount of land and Buildings which was impaired during the year amounted to € 239,752 (31.12.2019: € 9,920). During the impairment test of property, plant and equipment, the recoverable amount was calculated as the fair value which incorporates the property value and all the improvements that make it suitable for use by the Bank. The discount rates used range from 6.5% to 8% depending on the characteristics (location, size, use) of each asset.

The fair values of the properties are calculated in accordance with the methods described in note 1.2.6. and are classified, in terms of fair value hierarchy, in Level 3 since assumptions and inputs relating to properties of relevant characteristics are used for the determination of fair value and therefore encompass a wide range of unobservable market inputs.

It is noted that further to an updated report obtained by the competent divisions of the Bank relating to the effect of Covid-19 on the values of real estate properties in Greece it is estimated that these values have not been affected by the pandemic in order to merit further impairment in the fair values.

Additionally, there was no impact to the Bank deriving from the implementation of measures regarding leases concession, given that the Bank, as a lessee, has not been favored in this regard.Within 2020, the Bank transferred property, plant and equipment of carrying amount of € 324 to "Assets held for sale" within the context of the transfer of NPE business unit to Cepal

439 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Hellas, as further described in note 32. Respectively, in year 2019 property, plant and equipment of carrying amount € 9,920 had been transferred to "Assets held for sale".

Additionally, the Bank during 2020 transferred property, plant and equipment of carrying amount € 12,116 (31.12.2019: € 6,088) to "Investment property" as described in note 22.

Following the implementation of the new accounting standard, IFRS 16, effective from 1.1.2019, the Bank recognized a right-of-use on plant, property and equipment amounting to € 94,911, out of which an amount of € 86,889 relates to property leases.

With regards to Right-of-use on fixed assets, in 2020, there were no transfers from "Investment property" while in 31.12.2019 a transfer of fixed assets with carrying amount of € 10,271 (note 22) took place and an impairment loss of € 58 (31.12.2019: € 3,947) was recognized as well as a reversal of impairment amounting to € 3,741 (31.12.2019: € 0) included in "Other Expenses".

24. Goodwill and other intangible assets

	Software	Banking rights	Goodwill	Other	Total
Balance 1.1.2019					
Cost	664,668	1,785		138,339	804,792
Accumulated amortization and impairment losses	(318,149)	(1,785)		(94,413)	(414,347)
1.1.2019 - 31.12.2019					
Net book value 1.1.2019	**346,519**			**43,926**	**390,445**
Additions	112,262		237		112,499
Amortization charge for the year	(40,330)			(14,449)	(54,779)
Net book value 31.12.2019	**418,451**	**-**	**237**	**29,477**	**448,165**
Balance 31.12.2019					
Cost	776,930	1,785	237	138,339	917,291
Accumulated amortization and impairment losses	(358,479)	(1,785)		(108,862)	(469,126)
1.1.2020 - 31.12.2020					
Net book value 1.1.2020	**418,451**		**237**	**29,477**	**448,165**
Additions	108,333				108,333
Reclassification to "Assets held for sale"	(16,747)				(16,747)
Amortization charge for the year	(55,686)			(10,607)	(66,293)
Net book value 31.12.2020	**454,351**	**-**	**237**	**18,870**	**473,458**
Balance 31.12.2020					
Cost	853,355	1,785	237	138,339	993,716
Accumulated amortization and impairment losses	(399,004)	(1,785)		(119,469)	(520,258)

The additions of current year mainly concern software implementations and purchases of computer licenses.

Additions in Software during 2020, includes an amount of € 11,565 relating to development expenditure for software. Related amortization for the year amounted to € 233.

Within 2020, the Bank transferred to "Assets held for Sale" software with carrying amount of € 16,747 in the context of the transfer of the NPE business unit to Cepal, as further described in note 32.

"Other" mainly include amounts relating to other intangible assets representing customer relationships from the acquisition of Diners credit cards in 2015, with 7 years useful life, and the acquisition of the customer relationship and deposit base of Citibank in 2014 with 9 and 7 years of useful life respectively.

Additions of year 2019, includes an amount of € 237 arising from a goodwill from the acquisition of the accounting services sector of Alpha Supporting Services A.E.

During the impairment test of intangible assets, no indications for impairment were noted.

440 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

25. Deferred tax assets

	31.12.2020	31.12.2019
Assets	5,277,158	5,233,082
Total	**5,277,158**	**5,233,082**

Deferred tax assets and liabilities are analyzed as follows:

	1.1 - 31.12.2020			
	Balance 1.1.2020	Recognized in		Balance 31.12.2020
		Income statement	Equity	
Debit difference of Law 4046/2012 (note 13)	980,206	(44,555)		935,651
Debit difference of Law 4465/2017 (note 13)	751,740	1,652,405		2,404,145
Write-offs and depreciation of fixed assets and leases	12,969	(16,320)		(3,351)
Loan portfolio	2,907,984	(1,638,005)		1,269,979
Valuation of loans due to hedging	236	(582)		(346)
Valuation of derivatives financial instruments / Valuation Cash flow reserve	144,231	26,496	(6,044)	164,683
Defined benefit obligation and insurance funds	25,373	(1,664)	940	24,649
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	3,504	(560)		2,944
Valuation/impairment of investments	380,750	(98,425)		282,325
Valuation/impairment of debt securities and other securities	(84,674)	(20,326)	104,205	(795)
Other temporary differences	110,763	86,511		197,274
Total	**5,233,082**	**(55,025)**	**99,101**	**5,277,158**

	1.1 - 31.12.2019*					
	Balance 31.12.2018	Impact from the implementation of IFRS 16	Balance 1.1.2019	Recognized in		Balance 31.12.2019
				Income statement	Equity	
Debit difference of Law 4046/2012 (note 13)	1,024,761		1,024,761	(44,555)		980,206
Debit difference of Law 4465/2017 (note 13)	737,658		737,658	14,082		751,740
Writeoffs and depreciation of fixed assets and leases	14,432	11,408	25,840	(12,871)		12,969
Loans portfolio	2,686,634		2,686,634	221,350		2,907,984
Valuation of loans due to hedging	(25)		(25)	261		236
Valuation of derivatives financial instruments / Valuation Cash flows reserve	127,631		127,631	(21,232)	37,832	144,231
Defined benefit obligation and insurance funds	24,315		24,315	(2,112)	3,170	25,373
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	3,849		3,849	(345)		3,504
Valuation/impairment of investments	376,711		376,711	4,039		380,750
Valuation/impairment of debt securities and other securities	58,441		58,441	(10,912)	(132,203)	(84,674)
Tax losses carried forward	163,599		163,599	(163,599)		-
Other temporary differences	121,670		121,670	(10,907)		110,763
Total	**5,339,676**	**11,408**	**5,351,084**	**(26,801)**	**(91,201)**	**5,233,082**

* Certain figures of the previous year have been restated as described in note 47.

441 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

26. Other assets

	31.12.2020	31.12.2019
Tax advances and withholding taxes	175,326	151,962
Deposit and Investment Guarantee Fund	635,323	635,144
Property obtained from auctions and other property held for sale	330,350	238,409
Prepaid expenses	16,378	9,690
Employee advances	5,190	6,717
Accrued income	6,756	6,414
Other	203,791	307,942
Total	**1,373,114**	**1,356,278**

“Deposit and Investment Guarantee Fund” relates to the Bank’s participation in the assets of Investment Cover Scheme and Deposit Cover Scheme and comprises the following:

1. the amount of the contribution to the Investment Cover Scheme and
2. the difference on the regular annual contribution of credit institutions deriving from the application of article 6 of Law 3714/2008 “Borrowers protection and other provisions”, which increase the upper coverage level for the amount of deposits guaranteed by the deposit guarantee scheme from € 20 to € 100 per depositor.

The above difference is considered, according to Law 4370/7.3.2016 in “Deposit Guarantee Scheme (transposition of Directive 2014/49/EU), Deposit and Investment Guarantee Fund and other regulations” a distinct group of assets, which are considered to be assets of the participating depository institutions according to their participation.

Tax advances and withholding taxes is presented net of provisions amounting as at 31.12.2020 to € 64,763 (31.12.2019: 101,037).

As at 31.12.2010 the Bank measured “Property obtained from auctions and other property held for sale” at the lowest value between the carrying amount and fair value less costs to sell. For the cases where the fair value was lower than the carrying amount, an loss was recognized of € 2,058 and recorded in “Other expenses” of the Income Statement. As at 31.12.2019 the relevant loss amounted to € 10.The recoverable amount of the property obtained from auctions which was impaired during the current year amounted to € 48,522 (31.12.2019: € 12)

The fair value of the assets has been estimated based the methods mentioned in note 1.2.6 and are classified in terms of fair value hierarchy in Level 3, since it is based on market research data, assumptions and inputs relating to properties of relevant characteristics, and therefore encompass a wide range of unobservable market inputs. The capitalization rate used was between 6.5% and 8%.

It is noted that further to an updated report obtained by the competent divisions of the Bank relating to the effect of Covid-19 on the values of real estate properties in Greece it is estimated that these values have not been affected by the pandemic in order to merit further impairment in the fair values.

In 2019, the Bank transferred fixed “Property obtained from auctions and other property held for sale” with carrying amount of € 1,238 to “Assets held for Sale”, while in 2020 transferred fixed assets with carrying amount € 3,125 from “Assets held for Sale” to “Other Assets”, as described in note 44.

442 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

LIABILITIES

27. Due to Banks

	31.12.2020	31.12.2019
Deposits:		
- Current accounts	77,737	87,201
- Term deposits:		
Central Banks	11,868,432	3,064,446
Other credit institutions	332,813	545,347
Cash collateral for derivative margin account and repurchase agreements	10,488	21,108
Securities sold under agreements to resell (Repos)	524,715	6,543,219
Borrowing funds	519,614	493,174
Total	**13,333,799**	**10,754,495**

In order to cope with the effects of Covid-19 pandemic, ensure adequate liquidity, normalize market's condition and support the credit expansion, European Central Bank gradually announced since March 2020 a series of measures such as amendment on terms of the Targeted Longer Term Refinancing Operations III and a new bunch of non-targeted longer term refinancing operations due to the pandemic (Pandemic Emergency Longer Term Refinancing Operations). On 24.06.2020 the Bank proceeded to the early termination of the borrowed amount of € 3,1 billion, through the existing program of targeted long term refinancing II (TLTRO II) with an interest rate of -0,40% and raised additional liquidity of € 11.9 billion through the Targeted Long Term Refinancing Operations III (TLTRO III) with an interest rate -0,50% while at the same date an amount of € 7.5 billion that was raised during the nine month period of 2020 through the Long-Term Refinancing Operations (LTRO) matured. It is noted that the interest rate of TLTRO III can reach -1% for the period from June 2020 to June 2021 and remain to -0.5% for the residual period until maturity, provided that the amount of loans falling under the program remain for the period between March 2020 and March 2021, at March 2020's levels. The ECB announced on 10.12.2020 a further amendment to the terms of the TLTRO III program, according to which if, in addition to the achievement of the target set for the period March 2020 – March 2021, loans for the period October 2020 - December 2021 remain at the levels of October 2020 the interest rate can be set at -1% for the next period from June 2021 to June 2022. The Bank recognized interest for the year 2020 based on the interest rate of -0.50%. On 31.12.2020 the funding from the TLTRO III program amounts to € 11.9 billion and interest income for the year 2020 amounts to € 31,568.

In particular, given that changes in the interest rate based on the level of the achievement of the objectives are contractually prescribed and that at the beginning of the financing it was not possible to make reliable estimates in regards to the level of achievement of the objectives set by the European Central Bank, the Bank considered that the effective interest rate of the loan is equal to the conventional one. This effective interest rate will be adjusted as a conventionally predetermined variable interest rate when the estimates for the achievement of the objectives become reliable and cumulative adjust of the amount recognized in interest income. It is also noted that the interest rate of this loan has not been treated as an off-market interest rate loan as the European Central Bank has provided it to all credit institutions under its supervision. Finally, it is noted that until the date of the preparation of the financial statements there had been no change in the Bank's estimates in regards to the level of achievement of the objectives in relation to the date of initial recognition of the loan.

Regarding the reduction in liabilities to other credit institutions, the increase of ECB funding led to reduction in repos transactions.

"Borrowing funds" includes liabilities due to European Investment Bank.

Interest income recognized in 2020 and 2019 from the above transactions is included in "Interest and related income" of the Income Statement.

443 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

28. Due to customers

	31.12.2020	31.12.2019
Deposits:		
- Current Accounts	15,375,398	11,163,208
- Saving Accounts	12,409,550	10,565,786
- Term deposits:	11,648,927	13,710,102
	39,433,875	**35,439,096**
Cheques payable	101,211	102,370
Total	**39,535,086**	**35,541,466**

In 2020, due to customers increased by € 3,993,620 compared to the comparative period on the one hand due to the increase in private savings, as a result of the uncertainty caused by the pandemic and the reduced amount of consumer spending, as consumers cannot spend – in a degree - due to the measures of limiting the economic activity, and on the other hand due to the increase of the saving accounts of corporates, as a result of the restraint of the expenses, due to the uncertainty, but also due to the extraordinary measures adopted by the Greek Government in order to support businesses (e.g. provision of liquidity to businesses, which was provided through the banking system, suspension of tax payments and contributions to insurance funds).

29. Debt securities in issue and other borrowed funds

i. Covered bonds*

Change in covered bond liabilities are summarized as follows:

Balance 1.1.2020	**514,317**
Changes for the year 1.1 - 31.12.2020	
Repurchases	(943)
Maturities / Repayments	(12,500)
Financial (gains)/losses	(67)
Accrued Interests	11,642
Balance 31.12.2020	**512,449**

The following table presents additional information for the above mentioned issuances:

a. Held by the Bank

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+0.5% Minimum 0%	23.1.2023	1,000,000	1,000,000
Alpha Bank S.A.	Euro	3m Euribor+0.5% Minimum 0%	23.1.2023	1,000,000	1,000,000
Alpha Bank S.A.	Euro	3m Euribor+0.5% Minimum 0%	23.1.2023	200,000	200,000
Alpha Bank S.A.	Euro	2.50%	5.2.2023	1,000	
Total				**2,201,000**	**2,200,000**

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	2.5%	5/2/2023	499,000	500,000
Total				**499,000**	**500,000**

* Financial disclosures regarding covered bond issues, as determined by the 2620/28.8.2009 Act of the Bank of Greece, have been published on the Bank's site.

444 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ii Secured Note Program

On 25.10.2020 secured notes of nominal value amounting to € 800,000 expired.

The following table presents additional information for the above mentioned issuances:

Held by the Bank

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+1.8%	25/10/2020	-	800,000
Total					**800,000**

iii. Senior debt securities

Balance 1.1.2020	**1,369**
Changes for the year 1.1 - 31.12.2020	
Maturities / Repayments	(43)
Accrued Interests	227
Balance 31.12.2020	**1,553**

The following table presents additional information for the above mentioned issuances:

Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	2.50%	20/6/2022	350	350
Alpha Bank S.A.	Euro	2.50%	20/6/2022	1,345	1,345
Total				**1,695**	**1,695**

iv. Liabilities from the securitization of shipping loans

Balance 1.1.2020	**131,985**
Changes for the year 1.1 - 31.12.20	
Maturities / Repayments	(136,955)
Accrued interest	2,593
Foreign exchange differences	2,377
Balance 31.12.2020	-

The Bank has proceeded to a shipping loan securitization transaction, transferring the aforementioned loans to the fully consolidated Special Purpose Entity, Alpha Shipping Finance Ltd, which in turn raised funding from third parties. On 21.09.2020 the Bank purchased the total liability to third parties and from that date, the Bank, consists the only lender of the special purpose entity Alpha Shipping Finance Ltd.

v. Liabilities from the securitization of consumer loans

The Bank securitized consumer loans by transferring these loans to the fully consolidated special purpose entity, Katanalotika Plc, which in turn raised financing by issuing bonds. On 18.12.2019, the Class A bonds of the transactions Katanalotika Plc amounting to € 220,000 was transferred to third parties.

Balance 1.1.2020	**218,944**
Changes for the year 1.1 - 31.12.2020	
Maturities / Repayments	(65,452)
New Securitizations/ Desecuritizations	64,191
Accrued interest	2,317
Title repurchases	(219,856)
Result from settled obligation	(144)
Balance 31.12.2020	-

445 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

On 18.12.2019 the interest rate spread was amended as follows: 1.45% for the payment date March 2020, 1.35% from payment date June 2020 to December 2020 and 2.60% for the remaining payment dates.

The Bank repurchased the bond on 21.12.2020 and from this date, the Bank, consists the only lender of the special purpose entity Katanalotika Plc eliminating the liability to third parties.

vi. Liabilities from the securitization of other loans

Liabilities arising from the securitization of consumer loans, business loans and credit cards are not included in the account "Debt securities in issue and other borrowed funds", because the respective securities, with nominal amount of € 1,958,935 (31.12.2019: 3,159,400) issued by special purpose entities are owned by the Bank.

vii. Liabilities from the securitization of non-performing loans

On 30.4.2020, the Bank has proceeded to a securitization transaction of non performing consumer and corporate loans ("Galaxy"). More specifically, non performing loans were transferred to the Special Purpose entities Orion X Securitisation Designated Activity Company, Galaxy II Funding Designated Activity Company, Galaxy III Funding Designated Activity Company and Galaxy IV Funding Designated Activity Company, established in Ireland with an amount of € € 6,148,332.

The liabilities that arose from the aforementioned securitization, are not included in the caption "Debt securities in issue and other borrowed funds", due to the fact that the respective securities of a total nominal value € 11,722,272, issued by the Special Purpose entities, have been purchased by the Bank and cost of acquisition was equal to the book value of the loans that were securitized.

viii. Subordinated debt (Lower Tier II, Upper Tier II)

In the context of the Euro Medium Term Note Program of € 15 billion, the Bank issued on 13.2.2020 a subordinated debt at a nominal value of € 500 million for a period of ten years, with the option to recall in five years and with a fixed annual interest rate of 4.25%.

Balance 1.1.2020	**651**
Changes for the year 1.1 - 31.12.2020	
New issues	495,363
Maturities / Repayments	(8)
Hedging adjustments	4,161
Accrued interest	19,067
Balance 31.12.2020	**519,234**

The following table presents additional information for the above mentioned issues:

Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	**31.12.2019**
Alpha Bank S.A.	Euro	3m Euribor+1.5%	Indefinite	650	650
Alpha Bank S.A.	Euro	4.25%	13.2.2030	500,000	
Total				**500,650**	**650**

ix. Hybrid securities

Balance 1.1.2020	**15,300**
Changes for the year 1.1 - 31.12.2020	
Maturities / Repayments	
Interests	
Balance 31.12.2020	**15,300**

446 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following table presents additional information for the above mentioned issues:

Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				31.12.2020	31.12.2019
Alpha Bank S.A.	Euro	4 x (CMS10-CMS2), min 3,25%, max 10%	Indefinite	15,542	15,542
Total				**15,542**	**15,542**

Total of debt securities in issue and other borrowed funds, not held by the Bank, as at 31.12.2020	**1,048,536**

The following table presents the changes of debt securities and other borrowed funds by separately disclosing the cash and non-cash items.

Cash flows from financing activities	1.1.2020	Cash flows	Non cash flows				31.12.2020
		Desecuritization, New issues, maturities, repayments	Accrued interest	Foreign exchange differences	Fair value change	Other	
Senior debt securities	**1,369**	(43)	227				**1,553**
Liabilities from the securitization of shipping loans	**131,985**	(136,955)	2,593	2,377			**-**
Liabilities from the securitization of consumer loans	**218,944**	(221,117)	2,317			(144)	**-**
Subordinated loans	**651**	495,355	19,067			4,161	**519,234**
Hybrid securities	**15,300**						**15,300**
Covered bond loan	**514,317**	(13,443)	11,642			(67)	**512,449**

Cash flows from financing activities	1.1.2019	Cash flows	Non cash flows				31.12.2019
		Desecuritization, New issues, maturities, repayments	Accrued interest	Foreign exchange differences	Fair value change	Other	
Senior debt securities	**6,179**	(5,087)	277				**1,369**
Liabilities from the securitization of shipping loans	**245,377**	(127,834)	10,755	3,687			**131,985**
Liabilities from the securitization of corporate loans (SMEs)	**61,964**	(63,528)	1,564				**-**
Liabilities from the securitization of other loans	**-**	218,849	95				**218,944**
Subordinated loans	**651**	(8)	8				**651**
Hybrid securities	**15,293**		7				**15,300**
Covered bond loan	**511,843**	(12,500)	14,411			563	**514,317**

The above cash flows are included in the net cash flows from financing activities in the cash flow statement of the year.

447 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

30. Liabilities for current income tax and other taxes

	31.12.2020	31.12.2019
Income tax	50,560	3,050
Other taxes	13,736	21,837
Total	**64,296**	**24,887**

31. Employee defined benefit obligations

The total amounts recognized in the financial statements for defined benefit obligations are presented in the table below:

	Balance Sheet-Liabilities	
	31.12.2020	31.12.2019
Bank employee's indemnity provision due to retirement in accordance with Law 2112/1920	73,190	76,312
Savings program guarantee	2,761	2,703
Plans for Diners (pension and health care)	8,948	8,380
Total Liabilities	**84,899**	**87,395**

	Income Statement Expenses /(Income) From 1 January to	
	31.12.2020	31.12.2019
Bank employee's indemnity provision due to retirement in accordance with Law 2112/1920 (note 8)	8,238	4,496
Savings program guarantee (note 8)	(196)	217
Plans for Diners (pension and health care) (note 8)	76	125
Total	**8,118**	**4,838**

Balance Sheet and Income Statement amounts are analyzed per fund and type of benefit as follows:

a. Employee indemnity due to retirement in accordance with Law 2112/1920

The contracts of the regular employees of the Bank are indefinite term employee contracts and when terminated, the provisions of Law 2112/1920 and Law 3198/1955 apply, as amended by Law 4093/2012, which provide a lump sum benefit payment.

The amounts recognized in the balance sheet are as follows:

	31.12.2020	31.12.2019
Present value of defined obligations	73,190	76,312
Liability	**73,190**	**76,312**

The amounts recognized in the income statement are as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Current service cost	2,423	2,104
Net interest cost resulted from net asset/liability	646	1,240
Past service cost	75	1,363
Settlement/Curtailment/Termination (gain)/loss	5,094	(50)
Gain/(loss) from restructuring		(161)
Total (included in staff costs)	**8,238**	**4,496**

 The amounts are presented in thousands of Euro unless otherwise indicated

The movement in the present value of defined obligation is as follows:

	2020	2019
Opening Balance	**76,312**	**73,611**
Current Service cost	2,423	2,104
Interest cost	646	1,240
Benefits paid	(8,182)	(11,014)
(Gain)/Loss from Settlement/Curtailment/Termination	5,094	(50)
(Gain)/loss from restructuring		(161)
Past service cost	75	1,363
Reclassification to voluntary separation scheme provision		(1,098)
Transfer of staff to CEPAL	(5,654)	
Actuarial (gain)/loss-financial assumptions	2,584	10,492
Actuarial (gain)/loss-experience assumptions	(108)	(175)
Closing Balance	**73,190**	**76,312**

The amounts recognized in equity during the year are analyzed as follows:

	31.12.2020	31.12.2019
Change in liability gain/(loss) due to changes in financial and demographic assumptions	(2,584)	(10,492)
Change in liability gain/(loss) due to experience adjustments	108	175
Total actuarial gain/(loss) recognized directly in Equity	**(2,476)**	**(10,317)**

The movement in the defined obligation liability is as follows:

	31.12.2020	31.12.2019
Opening balance	**76,312**	**73,611**
Benefits paid	(8,182)	(11,014)
Loss/(Gain) recognized in Income Statement	8,238	4,496
Loss/(Gain) recognized in equity	2,476	10,317
Reclassification to voluntary separation scheme provision		(1,098)
Transfer of staff to CEPAL	(5,654)	
Closing balance	**73,190**	**76,312**

The amount of € 5,654 in 2020 corresponds to the accrued liability relating to the Bank's personnel that was transferred to the Bank's NPL servicing subsidiary Cepal following the spin off and transfer of non-performing loans business unit.

The amount of 1,098 during the year 2019 corresponds to the provision made for employees who used the long-term leave under the voluntary exit scheme. For this population, an additional provision of € 9,805 was formed during the fiscal year 2019 to cover the entire provision of the program until their final separation.

b. Savings plan guarantee

For employees hired by the Bank and insured from 1.1.1993 until 31.12.2004 the Bank has guaranteed that the lump sum benefit payment, according to the provisions of the insurance plan, will be at least equal to the benefit as defined in Law 2084/1992 and the Cabinet Act 2/39350/0022/2.3.99.

The amounts included in the balance sheet are analyzed as follows:

	31.12.2020	31.12.2019
Present value of defined obligation	2,761	2,703
Liability	**2,761**	**2,703**

449 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The amounts included in the income statement are analyzed as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Current Service Cost	124	160
Net Interest cost resulted from net asset/liability	22	57
(Gain)/Loss from Settlement/Curtailment/Termination	(342)	
Total (Included in staff costs)	**(196)**	**217**

The movement in the present value of defined benefit obligation is as follows:

	2020	2019
Opening Balance	**2,703**	**3,325**
Current service cost	124	160
Interest cost	22	57
(Gain)/Loss from Settlement/Curtailment/Termination	(342)	
Actuarial (gain)/loss-financial assumptions	(58)	1,203
Actuarial (gain)/loss-experience adjustments	312	(2,042)
Closing Balance	**2,761**	**2,703**

The amounts recognized directly in Equity during the year are analyzed as follows:

	31.12.2020	31.12.2019
Change in liability due to changes in financial and demographic assumptions - gain/(loss)	58	(1,203)
Change in liability due to experience adjustments - gain/(loss)	(312)	2,042
Total actuarial gain/(loss) recognized in equity	**(254)**	**839**

The movement in the obligation is as follows:

	2020	2019
Opening Balance	**2,703**	**3,325**
Loss/(gain) recognized in income statement	(196)	217
Loss/(gain) recognized in equity	254	(839)
Closing Balance	**2,761**	**2,703**

c. Supplementary Pension Fund and Healthcare of Diners

The Bank guarantees from 30.9.2014, date of acquisition of Diners Club Greece A.E., the Supplementary Pension Fund and Health Care Plan of the Company, which is managed by an independent insurance company.

On 2.6.2015, the merger through absorption of the company was completed. These plans cover the pensioners and those who have retired and have the right to receive supplementary pension in the future.

The amounts included in the balance sheet are analyzed as follows:

	31.12.2020	31.12.2019
Present value of defined obligation	10,943	10,726
Fair value of plan assets	(1,995)	(2,346)
Liability	**8,948**	**8,380**

The assets of the scheme includes only cash.

450 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The amounts included in the income statement are analyzed as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Net interest cost resulted from the net asset/liability	69	117
Expenses	7	8
Total (included in staff costs)	**76**	**125**

The movement in the present value of defined benefit obligation is as follows:

	2020	2019
Opening Balance	**10,726**	**9,528**
Interest Cost	86	161
Benefits paid directly by the Bank	(20)	(9)
Benefits paid by the Plan	(343)	(363)
Actuarial (gain)/loss-financial assumptions	414	1,391
Actuarial (gain)/loss-experience adjustments	80	18
Closing balance	**10,943**	**10,726**

The movement in the fair value of plan assets is as follows:

	2020	2019
Opening Balance	**2,346**	**2,717**
Expected return	17	44
Benefits paid	(343)	(363)
Expenses	(7)	(8)
Actuarial losses	(18)	(44)
Closing Balance	**1,995**	**2,346**

The amounts recognized directly in Equity during the year are analyzed as follows:

	2020	2019
Change in liability due to financial and demographic assumptions - gains/(loss)	(414)	(1,391)
Change in liability due to experience adjustments - gain/(loss)	(80)	(18)
Return on plan assets excluding amounts included in income statement - gain/(loss)	(18)	(44)
Total actuarial gain/(loss) recognized in equity	**(512)**	**(1,453)**

The movement in the obligation/(asset) is as follows:

	2020	2019
Opening Balance	**8,380**	**6,811**
Benefits paid directly by the Bank	(20)	(9)
(Gain)/loss recognized in Income Statement	76	125
(Gain)/loss recognized in Equity	512	1,453
Closing Balance	**8,948**	**8,380**

The results of the abovementioned valuations are based on the assumptions of the actuarial studies. The principal actuarial assumptions used for the above mentioned defined benefit plans are as follows:

	31.12.2020	31.12.2019
Discount rate	0.44%-0.58%	0.82%
Inflation rate	1.30%	1.30%
Return on plan assets	1.50%	1.50%
Future salary growth	1.70%	1.80%
Future pension growth	0.00%	0.00%

451 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The discount rate was based on the iBoxx Euro Corporate AA+ adjusted to the characteristics of the programs.

The average duration per program is depicted in the table below:

	31.12.2020	31.12.2019
Bank employee's indemnity provision due to retirement in accordance with Law 2112/1920	16.6	17.3
Saving program guarantee	16.4	17.2
Plans for Diners (pension and health care)	15.9	16.1

The table below presents the sensitivity analysis of the financial assumptions in regards to the obligation of the above programs:

	Percentage variation in liability (%)
Increase in discount rate by 0.5%	(7.7)
Decrease in discount rate by 0.5%	8.5
Increase in future salary growth rate by 0.5%	8.4
Decrease in future salary growth rate by 0.5%	(7.5)

For all the programs mentioned above, no contributions are expected to be paid during 2021.

32. Other liabilities

	31.12.2020	31.12.2019
Suppliers	54,790	54,811
Deferred income	235,904	7,518
Accrued Expenses	80,856	68,893
Liabilities to third parties	51,160	91,541
Liabilities to merchants from the use of credit cards	288,012	348,681
Lease liabilities	120,754	158,347
Other	159,053	204,768
Total	**990,529**	**934,559**

"Deferred income" includes an amount of € 228,453, which represents the result from the transfer of the Bank's Non Performing Exposures business unit (carve-out) to its subsidiary Cepal Hellas, as in further described in note 48. The assets transferred and liabilities assumed for the transferred business unit comprised of software and fixed assets with a total carrying amount of € 17,201 as well as staff termination indemnities of € 5,654, respectively. On 1.12.2020, the transfer of the Bank's Non Performing Exposures business unit was completed for a total consideration of € 240,000. The transaction was financed through a share capital increase of the subsidiary Cepal Holdings SA of € 147,000 and through loan financing of € 130,000.

It is noted that the carve – out, as well as the planned sale of Cepal, represent part of the strategic plan of the Bank for the reduction of its non performing exposures. The strategic plan includes the securitization and sale of a non-performing loan portfolio, as well as the sale of up to 80% of the shares of Cepal ("Project Galaxy") (see note 48). The Bank did not recognize the outcome from the transfer in the results of the year, considering the existence of specific commercial terms in the existing portfolio assignment agreement (SLA) and the fact that this transaction is part of the overall commercial agreement with the investor in which also includes the transfer of 80% of the company's shares. Therefore, the final outcome of the transfer will be recognized with the completion of the above transaction for which, however, at this stage there is considerable uncertainty for its completion.

In addition, as a result of the application of IFRS 16, the bank recognized on 1.1.2019 lease liabilities amounting to € 179,976. Lease liabilities as at 31.12.2020 amounted to € 120,754 (31.12.2019: € 158,347)

452 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Cash flows from financing activities are presented in the table below:

Cash flows from financing activities	1.1.2020	Cash flows	Non-cash flows		31.12.2020
			New leases	Other changes	
Lease liabilities	**158,347**	(30,340)	2,946	(10,199)	**120,754**

Cash flows from financing activities	1.1.2019	Cash flows	Non-cash flows		31.12.2019
			New leases	Other changes	
Lease liabilities	**179,976**	(31,168)	15,138	(5,599)	**158,347**

Lease liabilities mainly relates to buildings used by the Bank for its branches and other business units, offsite ATMs and executives leased cars.

The duration of the lease agreement in new branches is set at three years with the possibility of unilateral extension by the Bank for an additional period, taking into account current conditions at that respective period. The extensions are performed with the same terms as with the initial leases, retaining the right to terminate the contract at any time within the agreed period. The Bank's policy is to renew these contracts, if needed.

In the case of renewals of existing leases, the new lease is set at three years with the possibility of an unilateral extension by the Bank for an additional period, which decides whether to exercise in accordance with current conditions at that respective period. The extensions performed is with the same terms as of the initial lease, retaining the right to terminate the contract at any time within the agreed period. The Bank's policy is to renew these contracts, if needed.

In particular, in the case of branch Leases, which the Bank decided that the lease should be extended, the term of the lease is set at one or two years on the basis of the relevant extension right.

Finally, for leases of Off-site ATMs, for the majority of them, the lease duration is set at one or two years and if extended, since contractually the extension transpose them to indefinite, the duration of the lease is estimated for ten years.

As part of the transition to IFRS 16 standard, the Bank recognized on 1.1.2019 the right of use of assets and the lease liabilities for all leases falling within the scope of IFRS 16. Lease liabilities were discounted using the incremental borrowing rate of 1.1.2019. The average weighted discount rate was 2.71%.

In particular, on 1.1.2019 the Bank recognized right of use of assets amounting to € 114,922 million, out of which € 94,911 has been classified as own used assets and an amount of € 20,011 under investment property, receivables from finance leases of € 10,549 and liabilities from leases amounting to € 179,976 (notes 19, 22,23).

Within the context of IFRS 16 implementation, the following estimations were made:

(a) for contract renewals on the basis of extension rights; and

(b) for cases of indefinite life contracts, estimates for the determination of the duration that the Bank expects to make use of the lease.

It is noted that there are no property leases which include a variable lease term while variable leases have been included in the expenses relating to other types of leases.

In addition, there are no lease agreements signed in the last days of the year 2020 that have been in effect since 1.1.2021 and there are no cases where the Bank has sold and subleased a property owned.

Bank's policy on leases is detailed described in notes 1.2.11.

453 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

33. Provisions

Balance 1.1.2019	**218,596**
Changes for the year 1.1- 31.12.2019	
Other provisions	21,046
Other provisions used	(7,822)
Provision for separation schemes	92,531
Reclassification from employee's staff termination indemnity in accordance with Law 2112/1920 in voluntary separation scheme provision which is related to those who have retired using the long-term paid leave	1,098
Use of provision for separation schemes	(83,262)
Reversal of provision for separation scheme	(42,916)
Provisions to cover credit risk relating to letters of guarantee, letters of credit and undrawn loan commitments (note 11)	6,464
Used provision to cover credit risk relating to letters of guarantee, letters of credit and undrawn loan commitments (note 40.1)	(5,000)
Foreign exchange differences	11
Balance 31.12.2019	**200,746**
Changes for the year 1.1- 31.12.2020	
Other provisions	8,132
Other provisions used	(8,526)
Transfer to " Loans and advances to customers "	(1,000)
Provision for separation schemes	1,165
Use of provision for separation schemes	(12,509)
Provisions to cover credit risk relating to letters of guarantee, letters of credit and undrawn loan commitments (note 11)	1,662
Foreign exchange differences	(170)
Balance 31.12.2020	**189,499**

The amounts of other provisions are included in "Other Expenses" (note 10), the amounts of provisions to cover credit risk relating to financial guarantee contracts are included in "Impairment losses and provisions for credit risk" (note 11), and the amounts for provisions of staff separation schemes are included in "Staff costs and expenses for separation schemes" (note 8).

On 31.12.2020 the balance of provisions to cover credit risk relating to Letters of Guarantee, Letters of Credit and undrawn loan commitments amounts to € 106,672 (31.12.2019: € 106,181) of which an amount of € 1,464 (31.12.2019: € 1,527) relates to provisions for undrawn loan commitments and an amount of € 105,208 (31.12.2019: € 104,654) relates to provisions for Letters of Guarantee and Letters of Credit.

The balance of the provision for the separation schemes as at 31.12.2020 amounts to € 15,112 (31.12.2019 € 26,456) which relates to an amount of € 12,937 (31.12.2019: € 24,419) to cover the cost of employees who departed using the long term leave in the context of the exit programs that was in force for the period 2016 and onwards and to an amount of € 2,175 (31.12.2019: € 2,037) for the senior executives' indemnity program.

On 31.12.2020 the balance of other provisions amounts to € 67,714 (31.12.2019: € 68,109) out of which:

- An amount of € 31,133 (31.12.2019: € 25,176) relates to pending legal cases,
- An amount of € 11,172 (31.12.2019: € 17,522) relates to the Bank's assessment for the year ended 31.12.2020, for the dismissal of the appeals submitted in previous years regarding the obligation to make contributions to an insurance fund.
- the remaining balance of other provisions relate mainly to other provisions for operational loss events.

The caption "transfer to Loans and advances to customers" refers to a provision for a letter of guarantee given as collateral to cover credit risk to a subsidiary that has been forfeited and reclassified to other advances.

454 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

EQUITY

34. Share capital

The Bank's share capital on 31.12.2020 and 31.12.2019 amounts to € 463,110 divided into 1,543,699,381 ordinary registered shares with voting rights with a nominal value of € 0.30 each.

In the context of Stock Options Plan for the granting of stock options to key management personnel of the Bank and its connected entities, as further described in note 8, within January 2021, 2,281,716 options rights vested and exercised from the beneficiaries, in accordance with Performance Incentive Program for the fiscal years of 2018 and 2019. As a result of the above, 2,281,716 ordinary, registered, voting shares with nominal value of Euro 0.30 were issued and the Share Capital of the Bank increased by € 685.

35. Share premium

Share premium at 31.12.2020 and 31.12.2019 amounted to € 10,801,029.

From share capital increase described above from the exercise of the vested options the share premium increased by € 1.483 representing the difference in the fair value of the options exercised at the date of awarding to the key management personnel.

36. Reserves

Reserves are analyzed as follows:

a. Statutory reserve

	31.12.2020	31.12.2019
Statutory reserve	420,425	420,425

According to article 158 of Law 4548/2018 (the relevant clause included in the article 26 of the Bank's Article Association, as in force), one-twentieth (1/20) of the net profit of the year is deducted annually from each year's net profit for the formation of the statutory reserve. The deduction for the formation of the statutory reserve ceases to be mandatory when the reserve amounts one-third (1/3) of the share capital. Based on the provisions of the aforementioned article this reserve can be used only before any dividend distribution in order to offset any debit balance in the Retained Earnings.

b. Reserve of investment securities measured at fair value through other comprehensive income

	2020	2019
Opening Balance 1.1	**386,746**	**48,791**
Changes for the year 1.1 - 31.12		
Net change in fair value of securities measured at fair value through other comprehensive income, after income tax	8.815	545,999
Fair value of securities measured at fair value through other comprehensive income transferred to profit or loss, after income tax	(266.824)	(208,044)
Total	**(258,009)**	**337,955**
Balance 31.12	**128,737**	**386,746**

The movements for the year 2020 of the reserve for investment securities measured at fair value through other comprehensive income that relate to the revaluation of the investment securities and the transfer of the related reserve to Income Statement, amounts (amounts before income tax) to a credit amount of € 12,415 and a debit amount of € 375,808 respectively (1.1 – 31.12.2019 € 769,015 and debit amount € 293,020, respectively).

455 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

c. Cash flow hedge reserve recognised directly in equity

	2020	2019
Opening balance 1.1	(238,467)	**(145,846)**
Changes for the year 1.1 - 31.12		
Change in cash flow hedge reserve after income tax	14,797	(92,621)
Balance 31.12	(223,670)	**(238,467)**

d. Other reserves

	2020	2019
Opening balance 1.1	(266)	**(266)**
Changes for the year 1.1 - 31.12		
Balance 31.12	(266)	**(266)**

e. Reserve valuation for stock options rights to employees

	2020	2019
Opening balance 1.1	-	**-**
Changes for the year 1.1 - 31.12		
Reserve valuation for stock options right to employees	1,667	
Balance 31.12	1,667	**-**

At 31.12.2020, in the context of the Stock Options Plan and the stock options granted to key management personnel of the Bank and its connected entities, as detailed described in note 8, a reserve was recognized amounting to € 1,667 from the valuation of the abovementioned options.

Total reserves (a+b+c+d+e)	326,893	**568,438**

37. Retained earnings

i. Since 2019 there were no distributable profits, in accordance with article 44a of Codified Law 2190/1920, the Ordinary General Meeting of Shareholders on 21.7.2020 decided the non-distribution of dividends to ordinary shareholders of the Bank.

ii. Pursuant to article 159 of Law 4548 / 2018 and due to the fact that there are no distributable profits for the year 2019, the Board of Directors of the Bank at the Ordinary General Assembly Meeting of Shareholders will propose the non-distribution of dividends to the shareholders of the Bank.

456 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ADDITIONAL INFORMATION

38. Contingent liabilities and commitments

a. Legal issues

There are certain legal claims against the Bank, in the ordinary course of business. In the context of managing the operational risk events and based on the applied accounting policies, the Bank has established internal controls and processes to monitor all legal claims and similar actions by third parties in order to assess the probability of a negative outcome and the potential loss.

For cases where there is a significant probability of a negative outcome, and the result may be reliably estimated, the Bank recognizes a provision that is included in the Balance Sheet under the caption "Provisions". On 31.12.2020 the amount of the provision stood at € 31,133 (31.12.2019: € 25,176).

For those cases, that according to their progress and the assessment of the legal department as at December 31, 2020, a negative outcome is not probable or the potential outflow cannot be estimated reliably due to the complexity of the cases, and their duration, the Bank has not recognized a provision. As of 31.12.2020 the legal claims against the Bank for the above cases amount to € 223,808 (31.12.2019: € 284,451).

According to the legal department's estimation, the ultimate settlement of the claims and lawsuits is not expected to have a material effect on the financial position or the operations of the Bank.

b. Tax issues

The Bank has been audited by the tax authorities for the years up to and including 2010. Years 2011, 2012 and 2013 are considered as closed, in accordance with the Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority. On 13.07.2020 a regular audit order was issued for the year 2014, which was completed in December 2020. For the years 2011 up to 2019, the Bank has obtained a tax certificate with no qualifications according to the article 82 of Law 2238/1994 and the article 65A of Law 4174/2013. The tax audit for the tax certificate of 2020 is in progress. Emporiki Bank has been audited by the tax authorities for the years up to and including 2008. Years 2009-2013 are considered as closed, in accordance with the Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority. For the years 2011 up to 2013 Emporiki Bank has obtained a tax certificate with no qualifications.

The Bank's branch in London has been audited by the tax authorities up to and including 2016.

The Bank's branch in Luxemburg started its operation on June 2020.

On 2.6.2015, the merger by absorption of Diners Club of Greece A.E.P.P. was completed. Diners Club of Greece A.E.P.P. has been audited by the tax authorities for the years up to and including 2010. Years 2011, 2012 and 2013 are considered as closed, in accordance with the Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority. For the years 2011 up to 2013 Diners Club of Greece A.E.P.P. has obtained a tax certificate with no qualifications.

Based on Ministerial Decision 1006/5.1.2016 there is no exemption from tax audit by the tax authorities to those entities that have been tax audited by the independent auditor and they have received an unqualified tax audit certificate. Therefore, the tax authorities may reaudit the tax books for previous years.

Additional taxes, interest on late submission and penalties may be imposed by tax authorities, as a result of tax audits for unaudited tax years, the amount of which cannot be accurately determined.

c. Off Balance Sheet Commitments

The Bank as part of its normal operations, make contractual commitments, that in the future may result in changes in its asset structure. These commitments are monitored in off balance sheet accounts and relate to letters of credit, letters of guarantee and liabilities from undrawn loan commitments as well as guarantees given for bonds issued and other guarantees to subsidiary companies.

Letters of credit are used to facilitate trading activities and relate to the financing of contractual agreements for the transfer of goods locally or abroad, through direct payment to the third party on behalf of the Bank's customer. Letters of credit, as well as letters of guarantee, are commitments under specific terms and are issued by the Bank for the purpose of ensuring that its customers will fulfill the terms of their contractual obligations.

In addition, contingent liabilities for the Bank arise from undrawn loan commitments that may be drawn upon if certain requirements are fulfilled by counterparties.

The outstanding balances are as follows:

	31.12.2020	31.12.2019
Letters of credit	17,581	17,589
Letters of guarantee and other guarantees	3,673,553	3,648,662
Undrawn loan commitments	4,089,542	3,643,214
Guarantees provided for bonds issued by Bank's subsidiaries	15,542	15,542

The Bank measures the expected credit losses for all the undrawn loan commitments and letters of credit / letters of guarantee, which are included in the caption "Provisions".

Allowance for expected credit risk losses for the aforementioned exposures as of 31.12.2020 amounts to € 106,672 (31.12.2019: € 106,181) (note 33).

The Bank has committed to contribute in the share capital of the joint venture Alpha TANEO AKES up to the amount of € 23 (31.12.2019: € 23).

d. Pledged assets

Pledged assets, as at 31.12.2020 and 31.12.2019 are analyzed as follows:

- **Cash and balances with Central Banks:**
  i. The amount of mandatory reserves that the Bank has to maintain to the Bank of Greece on average for the period from 19.12.2020 to 26.01.2021, amounts to € 382,442 (31.12.2019: € 354,853). As at 31.12.2020, the pledged cash of the Bank amounts to € 0 (31.12.2019: € 0).
- **Due from Banks:**
  i. Placements amounting to € 190,871 (31.12.2019: € 212,006) relate to guarantees provided, mainly, on behalf of the Greek Government.
  ii. Placements amounting to € 1,632,348 (31.12.2019: € 1,345,744) have been provided as guarantee for derivative and other repurchase agreements (repos).
  iii. Placements amounting to € 64,125 (31.12.2019: € 6,455) have been provided for Letter of Credit or Guarantee Letters that the Bank issue for facilitating customer imports.
  iv. Placements amounting to € 16,066 (31.12.2019: € 12,568) have been provided to the Resolution Fund as irrevocable payment commitment, as part of the 2016 up to 2020 contribution. This commitment must be fully covered by collateral exclusively in cash, as decided by the Single Resolution Board.
  v. Placements amounting to € 267,151 (31.12.2019: € 315,521) relate to guarantees that have been provided to foreign subsidiaries to cover credit risk.
  vi. Placements amounting to € 13,060 (31.12.2019: € 19,412) have been given as collateral for the issuance of bonds with nominal value of € 2,700,000 (31.12.2019: € 3,500,000), out of which bonds of € 2,200,000 (31.12.2019: 3,000,000) held by the Bank, as mentioned below under "Loans and advances to customers".
- **Loans and advances to customers:**
  i. Loans of € 5,256,013 (31.12.2019: € 1,425,026) have been pledged to central banks for liquidity purposes.
  ii. Corporate loans and credit cards of carrying amount of € 1,350,583 (31.12.2019: € 2,609,063) have been securitized for the issuance of a Special Purpose Entities' corporate bond of a nominal value of € 1,378,935 (31.12.2019: € 2,799,400) held by the Bank, of which an amount of € 166,000 (31.12.2019: € 1,774,700) has been given as collateral for repurchase agreements (repos).

458 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

iii. Shipping loans with carrying amount of € 206,787 (31.12.2019: € 335,594), have been securitized for the purpose of financing a Group's Special Purpose Entity. This loan has been repurchased by the Bank within September while the nominal value, as at 31.12.2020, amounted to € 39,771 (31.12.2019: € 154,432).

iv. Customer loans of carrying amount of € 493,145 (31.12.2019: € 499,242)have been securitized for the issuance of Special Purpose Entities' corporate bond of a nominal value of € 580,000 as at 31.12.2020 (31.12.2019: € 580,000) of which the amount of € 580,000 (31.12.2019: € 360,000) is held by the Bank.

v. Corporate loans of a carrying amount of € 6,236 (31.12.2019: € 11,174) have been given as collateral for other funding.

vi. Mortgage loans of a carrying amount of € 3,138,839 have been used as collateral in Covered Bonds Issuance Program I and Covered Bond Issuance Program II. The nominal value of the respective bonds issued amounts to € 2,700,000 of which an amount of € 2,200,000 is held by the Bank and has used as collateral in Central Banks for funding purposes. Respectively on 31.12.2019 mortgage loans of a carrying amount of € 4,421,909 had been used as collateral in Covered Bonds Issuance Programs I and II and the Secured Notes Program of the Bank. On 31.12.2019 the nominal amount of the relates notes issued amounted to € 3,500,000, of which € 3,000,000 was held by the Bank and had been used as collateral in the context of repurchase agreements (repos) by an amount of € 800,000 and the amount of € 2,200,000 had been pledged to Central Banks for liquidity purposes.

- **Investment securities:**

i. Bonds issued by the Greek Government, with a carrying amount of € 4,031,940 (31.12.2019: € 0), has been given to the European Central Bank for liquidity purposes,

ii. Treasury bills issued by the Greek Government, with a carrying amount of € 708,784 (31.12.2019: € 0), have been given to the European Central Bank for liquidity purposes

iii. Bonds issued by Other Governments, with a carrying amount of 2,489,904 (31.12.2019: 1,204,664), have been given to Central Banks for liquidity purposes.

iv. Securities issued by the European Financial Stability Facility (EFSF), with a carrying amount of € 224,201 (31.12.2019: € 188,129), have been pledged to Central Banks with the purpose to participate in main refinancing operations.

v. Bonds issued from the securitization of receivables of finance leases of Group's entity, with a carrying amount of € 0 (31.12.2019: € 248,541), have been given as collateral repurchase agreements (repos).

vi. Bonds issued by the Greek Government, with a carrying amount of € 288,730 (31.12.2019: € 3,938,225), have been given as collateral repurchase agreements (repos)

vii. Greek government treasury bills, with a carrying amount of € 0 (31.12.2019: € 99,936), have been given as collateral repurchase agreements (repos)

viii. Other corporate issuances, with a carrying amount of € 47,937 (31.12.2019: € 111,468), have been given as collateral for repurchase agreements (repos) and bonds issued by Other Governments, with a carrying amount of € 0 (31.12.2019: € 745,204), have been given as collateral for repurchase agreements (repos).

Additionally, the bank:

i. has obtained Greek Government treasury bills of nominal value of € 900,000 (31.12.2019: € 870,000), as collateral for derivatives transactions with the Greek State of which a nominal value of € 222,985 (31.12.2019: € 118,000) have been given as a collateral in the context of repo agreements.

ii. has obtained bonds with a nominal value of € 374,582 (31.12.2019: € 1,127,750) and a fair value of € 443,158 (31.12.2019: € 1,163,277), which are not recognized in the Bank's balance sheet. From these securities a fair value of € 301,591 (31.12.2019: € 732,960) has been pledged to Central Banks for liquidity purposes and a fair value of € 78,662 (31.12.2019: € 430,316) has been given as a collateral in the context of repo agreements.

39. Operating segments

a. Analysis by operating segment

(In million of Euro)

	1.1 – 31.12.2020					
	Retail Banking	Corporate Banking	Asset Management/ Insurance	Investment Banking/ Treasury	Other/ Elimination Center	Total
Net interest income	650.7	495.1	(7.9)	167.3	0.2	1.305.4
Net fee and commission income	114.8	101.5	40.1	24.5		280.9
Other income	56.1	(5.6)	(9.9)	610.1	(32.2)	618.5
Total Income	**821.6**	**591.0**	**22.3**	**801.9**	**(32.0)**	**2,204.8**
Total Expenses	**(560.1)**	**(142.8)**	**(17.7)**	**(22.4)**	**(105.5)**	**(848.5)**
Impairment losses and provisions to cover credit risk	(898.4)	(231.1)		(2.5)		(1,132.0)
Impairment losses of other financial assets				(10.7)		(10.7)
Profit/(losses) before income tax	**(637.0)**	**217.1**	**4.6**	**766.3**	**(137.5)**	**213.6**
Income tax						(75.1)
Profit/(losses) after income tax						**138.4**
Assets 31.12.2020	22,553.3	15,079.5	204.5	19,270.1	7,913.3	65,020.7
Liabilities 31.12.2020	28,919.1	8,546.9	1,420.3	16,770.5	1,359.1	57,015.9
Capital Expenditure	95.8	30.5	3.6	4.2		134.1
Depreciation and Amortization	(82.1)	(26.2)	(3.1)	(3.6)	(13.9)	(128.9)

Losses before income tax of the operating segment "Other / Elimination Centre", totaling to € 137.5 million, include eliminations between operating segments totaling to € 6.7 million and unallocated amounts totaling to € 130.8 million. These unallocated amounts refer to a) non-recurring items that do not relate to a specific operating segment and therefore cannot be allocated and b) results from activities that do not represent reportable operating segments.

(In million of Euro)

	1.1 – 31.12.2019*					
	Retail Banking	Corporate Banking	Asset Management/ Insurance	Investment Banking/ Treasury	Other/ Elimination Center	Total
Net interest income	678.9	492.7	(9.3)	136.0	(1.8)	1.296.5
Net fee and commission income	120.0	119.1	36.5	13.3		288.9
Other income	16.0	(49.9)	(4.5)	405.8	(20.7)	346.7
Total Income	**814.9**	**561.9**	**22.7**	**555.1**	**(22.5)**	**1,932.1**
Total Expenses	**(595.4)**	**(158.6)**	**(18.1)**	**(20.6)**	**(74.2)**	**(866.9)**
Impairment losses and provisions to cover credit risk	(559.7)	(314.3)		(56.1)		(930.1)
Impairment losses of other financial assets				5.3		5.3
Expenses for separation schemes					(49.6)	(49.6)
Profit/(losses) before income tax	**(340.2)**	**89.0**	**4.6**	**483.7**	**(146.3)**	**90.8**
Income tax						(29.9)
Profit/(losses) after income tax	-	-	-	-	-	**60.9**
Assets 31.12.2019	21,840.9	14,206.7	131.5	14,690.0	7,112.1	57,981.2
Liabilities 31.12.2019	26,259.1	7,703.6	1,338.6	13,649.7	922.8	49,873.8
Capital Expenditure	107.4	33.0	3.6	3.9		147.9
Depreciation and Amortization	(75.2)	(23.1)	(2.7)	(2.7)	(5.7)	(109.4)

Losses before income tax of the operating segment named "Other/Elimination Center" totaling to € 146.3 million include eliminations between operating segments totaling to € 6.6 million and unallocated amounts totaling to € 139.6 million. These

* Certain figures of the previous year have been restated as described in note 47.

460 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

unallocated amounts refer to a) non-recurring items that do not relate to a specific operating segment and therefore cannot be allocated and b) results from operations that do not represent reportable operating segments.

i. Retail Banking

It includes all individuals (retail banking customers) of the Bank, self-employed professionals, small and very small companies. The Bank, through its extended branch network, offers all types of deposit products (deposits/ savings accounts, working capital/ current accounts, investment facilities/ term deposits, Repos, Swaps), loan facilities (mortgages, consumer, corporate loans, letters of guarantee), debit and credit cards of the above customers as well as bancassurance products which are provided through cooperating companies.

ii. Corporate Banking

It includes all medium-sized and large companies, with international activities, corporations with international business activities, enterprises which cooperate with the Corporate Banking Division, as well as shipping corporations. The Bank offers working capital facilities, corporate loans, and letters of guarantee of the abovementioned corporations.

iii. Asset Management/Insurance

It includes a wide range of asset management services offered through Bank's private banking units, as well as the proceeds from the sale and the management of mutual funds.

iv. Investment Banking/Treasury

It includes stock exchange, advisory and brokerage services related to capital markets, and also investment banking facilities, which are offered by the Bank. It also includes the activities of the Dealing Room in the interbank market (FX Swaps, Bonds, Futures, IRS, Interbank placements Loans etc.).

v. Other / Elimination Center

This segment includes the non-financial activities of the Bank, as well as unallocated / one-off income and expenses and intersegment transactions.

Income and expenses per segment also include transactions between operating segments. All transactions are conducted on market terms. Intersegment transactions are eliminated.

The assets of the operating segments "Retail" and "Corporate Banking" include the following Bank's loans, which have been placed under the supervision of the Non-Performing Exposures Strategy, Recovery and Monitoring Division following a full outsourcing to third party service providers of Non-Performing Exposures Management Services (Servicers) from 1.12.2020.

	31.12.2020			31.12.2019		
	Balance before allowance for expected credit losses	Allowance for expected credit losses	Balance after allowance for expected credit losses	Balance before allowance for expected credit losses	Allowance for expected credit losses	Balance after allowance for expected credit losses
Mortgages	6,840,339	1,920,069	4,920,270	7,164,613	1,832,831	5,331,782
Consumer Loans	2,844,517	1,650,657	1,193,861	2,985,867	1,519,479	1,466,388
Corporate Loans	7,887,827	3,821,920	4,065,906	7,564,525	3,631,725	3,932,800
Total	**17,572,683**	**7,392,646**	**10,180,037**	**17,715,005**	**6,984,035**	**10,730,970**

The amounts are presented in thousands of Euro unless otherwise indicated

b. Analysis by geographical segment

Greece includes the Bank's activities except from the branches in London and Luxemburg which is included in Other Countries.

(In million of Euro)

	1.1 - 31.12.2020		
	Greece	Other Countries	Total
Net interest income	1,302.6	2.8	1,305.4
Net fee and commission income	280.3	0.6	280.9
Other income	617.4	1.1	618.5
Total Income	**2,200.3**	**4.5**	**2,204.8**
Total Expenses	**(844.6)**	**(3.9)**	**(848.5)**
Impairment losses and provisions to cover credit risk	(1,132.0)		(1,132.0)
Impairment losses of other financial assets	(10.7)		(10.7)
Profit/(losses) before income tax	**213.0**	**0.6**	**213.6**
Income tax			(75.1)
Profit/(losses) after income tax	**213.0**	**0.6**	**138.4**
Non current assets 31.12.2020	1,162.5		1,162.5

(In million of Euro)

	1.1 - 31.12.2019*		
	Greece	Other Countries	Total
Net interest income	1,291.80	4.70	1,296.50
Net fee and commission income	287.60	1.30	288.90
Other income	346.70		346.70
Total Income	**1,926.10**	**6.00**	**1,932.10**
Total Expenses	**(861.1)**	**(5.8)**	**(866.9)**
Impairment losses and provisions to cover credit risk	(930.10)		(930.10)
Impairment losses of other financial assets	5.30		5.30
Expenses for separation schemes	(49.60)		(49.60)
Profit/(losses) before income tax	**90.6**	**0.2**	**90.8**
Income tax			(29.9)
Profit/(losses) after income tax	**90.6**	**0.2**	**60.9**
Non current assets 31.12.2019	1,185.30		1,185.30

Non current assets include:

- Investment property
- Property, plant and equipment
- Goodwill and other intangible assets

* Certain figures of the previous year have been restated as described in note 47.

462 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

40. Risk Management

The Bank has established a thorough and prudent risk management framework which, based on the common European legislation and common banking rules, principles and standards, evolves over time in order to be implemented in a coherent and effective manner on the Bank's conduct of the day-to-day business, in Greece and abroad, ensuring the effectiveness of the corporate governance of the Bank.

The bank's critical focus in 2020 was to maintain high standards in corporate governance and comply with supervisory risk regulations in order to retain confidence in the conduct of its business activities through the appropriate services.

RISK MANAGEMENT FRAMEWORK

Governance of Risk Management

The Board of Directors supervises the overall operations of the Risk Management Unit. The BoD has established the Risk Management Committee (RMC), which convenes on a monthly basis and reports to the BoD. The RMC recommends to the BoD for approval the risk and capital management strategy, monitors its implementation and evaluates its effectiveness.

The risk management framework and its effectiveness are re-assessed on a regular basis in order to ensure compliance with international practices as well as with supervisory and regulatory requirements.

For a more comprehensive and effective identification and monitoring of all risk types, Management Committees have been established (Assets Liabilities Management Committee, Operational Risk Committee and Credit Risk Committee).

Risk Management Unit

The General Manager Chief Risk Officer supervises the Risk Management Unit of the Bank and report on a regular basis and ad hoc to the Management Committees, the Risk Management Committee and to the Board of Directors. As far as credit risk is concerned the reporting to the above-mentioned Committees covers the following areas:

- The risk profile of portfolios by rating grade.
- The transition between rating grades (migration matrix).
- The estimation of the relevant risk parameters by rating grade, group of clients, etc.
- The trends of basic rating criteria.
- The changes in the rating process, in the criteria or in each specific parameter.
- The concentration risk (by risk type, sector, country, collateral etc.).
- The evolution of Gross Loans, +90 days past due loans, Non-Performing exposures and the monitoring KPIs on a group basis.
- The Cost of Risk.
- The IFRS 9 staging transition of exposures per asset class.
- The maximum risk appetite per country, sector, currency, business Units, limit breaches and mitigation plans.

Organizational Structure

In the Bank, under the supervision of the General Manager - Group Chief Risk Officer, the following Risk Management Divisions operate within the Bank and have been assigned with the responsibility of implementing the risk management framework, according to the principles of the RMC.

- Credit Control Division
    - Credit Risk Policy and Control Division
    - Credit Risk Methodologies Division
    - Credit Risk Cost Assessment Division
- Credit Risk Data and Analysis Division

- Credit Risk Data Management Division
- Credit Risk Analysis Division

- Market and Operational Risk Division
- Risk Models Validation Division
- Wholesale Credit Division
- Credit Workout Division
- Retail Credit Division

For credit risk management purposes, facilities are separated into Wholesale and Retail, as described below.

40.1 Credit Risk

WHOLESALE BANKING CREDIT FACILITIES

Wholesale Banking credit facilities fall under one of the below two categories based on characteristics of the facility and the obligor, as shown in the table below:

	Portfolio	Characteristics
Obligors monitored by the Wholesale Banking Divisions	Large Corporates	Companies with turnover > Euro 75 million Includes financing in shipping companies, as well as, obligors under the management of the Investment Banking Division
	SME's	Companies with turnover > Euro 2.5 million and up to Euro 75 million or companies with credit limit > Euro 1 million

1. Credit Risk Approval Process

The Bank, following best international practices and taking into account the prevailing institutional framework set by legislation, regulations, ministerial decrees/decisions, etc, has established a robust credit risk framework, where the key principles and guidelines, the procedures and actions followed and the responsibilities of all related Units and Officers are clearly defined based on the four eyes principle.

Within this context, all credit proposals are prepared by the Business Units, are reviewed by the Credit Units and are subsequently forwarded for assessment and final decision to the respective Credit Committee based on the total credit exposure, the borrower risk rating, the provided collaterals and the environmental and social risk evaluation.

The limits of the Wholesale Banking Credit Committees are determined in accordance to Total Credit Risk, which is defined as the sum of all credit exposures to the obligor (single company or group of connected companies) which can be approved by the Bank and include the following:

- Total credit requested exposure
- Working Capital limits
- Withdrawal limits from unclear deposits
- Letters of Credit and Letters of Guarantee
- Factoring limits
- Derivative transaction limits
- Corporate Cards limits
- Medium and long-term loans (current outstanding/exposure for facilities that have been fully drawn or limit amount of undrawn facilities).
- Leasing Facilities (current outstanding/exposure for leasing facilities that have been fully drawn or limit amount for undrawn/unused facilities).
- Special credit limits or loans, or any form of personal financing to the company's business owners (mortgage loans, consumer loans, shares' purchase, credit cards etc.).

Wholesale Banking Credit Committees

Credit Committees decisions are multidimensional, with the main assessments performed being as following:

- Approval of the terms of new loans, renegotiations or restructuring of existing credit facilities.
- Approval of the loan pricing, considering the overall profitability of a client's relationship based on the Return on Risk Adjusted Capital – RoRAC (historical RoRAC and post – new money RoRAC).
- Credit Limit Expiry/Renewal date (depending on the customer's credit risk zone) and any deviations from the rule.
- Amendment on the collateral structure.
- Decision on actions in case of activation of early warning triggers.
- Financial Difficulty assessment.
- Unlikeliness to Pay (UTP) assessment.
- Credit Risk rating.
- Environmental and Social (E&S) risk assessment.

Credit Committees Structure:

- Wholesale Banking Credit Committee I
- Wholesale Banking Credit Committee II
- Wholesale Banking Credit Committee III
- Wholesale Banking Credit Committee IV
- Wholesale Banking Credit Committee V

Credit Limit Expiry/Renewal date:

The credit limits' expiry/renewal date is determined by the relevant Wholesale Banking Credit Committees. The basic factor for the determination of the credit limit expiry is the credit rating, which is not a standalone approval or rejection criterion, but the basis for determining the minimum amount and quality of collaterals required and the respective pricing. As a rule, for obligors that have been rated in the Low, Medium and Acceptable credit risk zones, reviews are carried out on an **annual basis**, for Watch List clients, on a **semi-annual basis** while obligors that have been rated in the High Risk zone are reviewed on a **quarterly basis**. Deviations from the above rule are allowed when there is a reasoned request by the responsible Business Units approved by the competent Credit Committee.

2. Credit Risk Assessment and Internal Ratings

The assessment of the borrower's creditworthiness and rating in credit risk scales is performed through rating systems.

The rating of the Bank's borrowers with the use of credit risk rating systems constitutes a basic tool for:

- The decision-making process of Credit Committees for the approval/ renewal of credit limits and the implementation of the appropriate pricing policy (interest rate spreads etc.).
- The estimation of the future behavior of borrowers which belong to a group with similar characteristics.
- The early recognition of potential troubled facilities (early alert mechanism) and the prompt, effective action for the minimization of the expected loss for the Bank.
- The assessment of the quality of the Bank's loan portfolio and the credit risk undertaken.

The aim of the credit risk rating systems is the estimation of the probability that the borrowers will not meet their contractual obligations to the Bank as well as the Expected Credit Loss estimation.

The rating systems employed by the Bank are the Alpha Bank Rating System (ABRS) and Risk Analyst (RA) which incorporate different credit rating models.

All current and future clients of the Bank are assessed based on the appropriate credit risk rating model and within pre-specified time frames.

For the estimation of the probability of default of the borrowers of the Bank and Group's Entities the credit risk rating models evaluate a series of parameters, which can be grouped as follows:

- Financial Analysis: obligor's Financial Ability (liquidity ratios, debt to income, etc.)
- Peers' Analysis: obligor's comparative position in the market in which it operates mostly compared to its peers.
- Behavioral status and history of the obligor with the Bank and with third parties (debt in arrears, adverse transaction records, etc.).
- Obligor's qualitative characteristics (solid and healthy administration, management succession, appropriate infrastructure and equipment etc.).

The credit rating models which are currently employed by the Bank are differentiated according to:

- The turnover of the company.
- The level of the total credit risk exposure.
- The credit facility's specific characteristics.
- The available information for the obligor's assessment. Specifically, for the financial analysis the differentiation relates to the type of the local accounting standards and the International Financial Reporting Standards (IFRS).

For each of the credit rating models, different parameters may be used, each of which contributes in a specific manner to the relevant assessment.

The statistical validation of the credit risk rating models is reviewed regularly in order to ensure the maximum predictive and discriminatory ability according to the supervisory and regulatory framework for credit risk management.

Obligors Rating Scale

Borrowers are rated in the following rating scales:

AA, A+, A, A–, BB+, BB, BB–,B+, B, B–, CC+, CC, CC–, C, D, D0, D1, D2.

For special purpose financing (Structured and Shipping Financing) special models have been designed (slotting) with the following categorization scale:

Strong (Class 1), Good (Class 2), Satisfactory (Class 3), Weak (Class 4), Default (D, D0, D1, D2).

For presentation purposes of table "Loans by credit quality and IFRS 9 Stage", "strong" includes the rating scales AA, A+, A, A–, BB+ and BB and Categories 1 and 2, "satisfactory" includes the rating scales BB–, B+, B, B–, CC+, CC and Category 3, and "Watchlist" (higher risk) includes the rating scales CC–, C and Category 4. Finally, default category includes the rating scales D, D0, D1, D2.

RETAIL BANKING CREDIT FACILITIES

Retail banking involves the lending facilities offered from the Bank to borrowers covering traditional banking products and services such as:

- Housing loans/Mortgages
- Consumer Loans and Credit Cards
- Small businesses and professionals (SB): Individuals and Legal entities with turnover up to Euro 2.5 million and credit limit up to Euro 1 million.

1. Credit Risk Approval Process

The Bank monitors customer Total Credit Risk Exposure (For Individuals and Small Businesses), which refers to the sum of all revolving limits of an obligor, all the balances of long term facilities and for the case of small businesses the total exposure of facilities given to stakeholders of customer companies. Additionally, facilities for which the borrower is guarantor or co-debtor are also taken into account.

The Bank has developed and implemented a strict framework for the conduct of credit policy (legislative and supervisory /

regulatory) and has also formulated and put into effect an internal system of credit principles, procedures and rules clearly applicable to the Bank's lending business, in order to promote sound practices for managing credit risk.

Credit policies establish the framework for lending and guide the credit-granting activities of Retail Banking through:

- Sound lending management.
- Prudent client selection through in-depth assessment of both financial and qualitative data of the borrower
- Assessing the risk/reward relationship with a respective determination of pricing policy and collateral coverage after taking into account the level of credit risk.
- Monitoring and management of the total credit risk, i.e. the consolidated risk from any type of credit facility granted by the Bank and the Group's companies.

The enforcement of the Credit Policy requires certain criteria to be met. These criteria play a significant role in the achievement and maintenance of a healthy portfolio and in the Bank's Capital allocation. In particular:

Individuals

The approval process of credit to individuals (individuals with earnings from salaries, pensions or other sources of income not related with business activities) is performed on the basis of the classification of borrowers into risk groups, which represent a certain level of undertaken risk. The level of risk undertaken by the Bank is adjusted, when deemed necessary, according to its credit policy.

The credit assessment for individuals is based upon the following pillars:

- Application fraud detection;
- Willingness to pay;
- Ability to pay;
- Collateral risk.

Small Businesses

Small Businesses are defined as following:

- Personal businesses with turnover up to € 2.5 million and a credit limit up to € 1 million
- Self-employed professionals with a credit limit up to € 1 million
- Legal entities with turnover up to € 2.5 million and a credit limit up to € 1 million.

The creditworthiness of Small Businesses in the Retail Banking sector is related to the creditworthiness of company's stakeholders / managers of the business and vice versa. Therefore, the evaluation of claims in this category is based on two dimensions:

- The valuation of the creditworthiness of business's stakeholders or business managers.
- The valuation of the creditworthiness of the company.

The creditworthiness of a business's stakeholders or managers is based on the specific pillars:

- Willingness to pay.
- Ability to pay.

Hence, the credit assessment for the small businesses is based on the following:

- Application fraud detection;
- Demographics;
- Financials;
- Behavior;
- Credit Bureau;
- Qualitative data; and
- Collateral risk.

2. Internal Models

The fundamental parameter in assessing Retail Banking Credit Risk is the Credit Scoring Models that are developed and employed throughout the credit cycle at the Bank level. The above models segment the population into homogenous risk groups (pools) and are categorized as follows:

- Behavior Models, which assess the customer's performance and predict the probability of defaulting within the following months;
- Application Credit Scoring Models, which assess application data-mainly demographic that predict the probability of defaulting within the following months; and
- Models for the assessment of regulatory parameters. It is noted that since 1.1.2018, the Bank's credit risk assessment models are in line with International Financial Reporting Standard 9 (IFRS 9).

These models and the probabilities of default that derive from them, contribute a significant role in risk management and decision making throughout the Bank. Specifically, the models are used in the following segments:

- Decision making of credit assessment and credit limit assignment.
- Impairment assessments
- Predicting future performance of customers belonging to the same pool of common characteristics.
- Tracing high risk accounts in time to schedule all necessary actions so as to reduce expected losses for the Bank.
- Assessing the Bank's portfolio quality and credit risk.

The parameters taken into account vary, according to the model's type and product category that it assesses. Indicatively, some factors are:

- Personal/demographic data: the customer's age, profession, marital status, or current address;
- Loan characteristics: product applied for, loan term, loan amount, or financing purpose;
- Behavioral data: payments during latest period of time, maximum delinquency, outstanding loan balance versus loan limit, transaction type;
- Qualitative data: Activity Sector, Number of Employees, Company Type.

Models are reviewed, validated and updated on a yearly basis and are subject to quality control so as to ensure at their predictive power at any point in time.

Furthermore, on a regular basis exercises simulating crisis situations (Stress Tests) are conducted, which explore the potential impact on the financial results of the Bank due to unfavorable developments both in obligors' transactional behavior as well as in the broader financial macroeconomic environment.

For presentation purposes of table "Loans by credit quality and IFRS 9 Stage" for Retail Banking loans, the classification in "Strong", "Satisfactory" and "Watchlist" categories, is based on the twelve-month Probability of Default. The range of probabilities that determines this classification, has derived from an analysis aiming at optimizating discriminatory power between categories. Therefore, it may differ for each category as presented below:

	Range of probability of default			
Rating Classification	**Mortgages**	**Consumer**	**Credit cards**	**Small Businesses**
Strong	up to 3%	up to 4.0%	up to 3.8%	up to 4.7%
Satisfactory	from 3% up to 16.5%	from 4.0% up to 20%	from 3.8% up to 16%	from 4.7% up to 17%
Watchlist	over 16.5%	over 20%	over 16%	over 17%

CREDIT CONTROL

According to the risk management and control framework, there are three "lines of defense" with distinctly allocated roles and responsibilities and specifically the Business and Operations Units (first "Line of Defense"), the Risk Management Units (second "Line of Defense") and the Internal Audit Unit (third "Line of Defense").

In the context of operating the second line of defense, for the sectors of Retail Banking, Wholesale Banking and Private and

468 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Investment Banking, the Bank has established controls in order to optimise Credit Risk management, to assess the quality of the loan portfolio and to ensure that the first "line of defense" operates within the framework set out for effective Credit Risk management.

This second line of defense is an independent unit and aims, among else, to:

- Design and develop procedures and controls for credit risk management.
- Monitor the adequacy and effectiveness of existing credit risk management procedures.
- Highlight critical issues and deviations from the Bank's Manuals and Policies.
- Provide guidelines and instructions related to procedures for management and control of credit risk
- Provide information to concerned Units about the findings of the controls and any recommendations made.

In order to reinforce the second line of defense the Bank has established, in 2018, the Risk Models Validation Division, an independent division from model development activities, with direct reporting line to General Manager and CRO. The role of Risk Models Validation Division, in the context of the MRM Framework, encompasses different responsibilities and activities related to the monitoring of the performance of the models undertaken by the first line of defense. Its primary task is to independently challenge and ensure that models are sound, fit-for-purpose as well as aligned with the regulatory guidelines. Risk Models Validation Division responsibility is to develop systematic procedures for the evaluation of models' performance as well as model related processes, on a periodic basis. The frequency, rigor and sophistication of the validation process followed for each model is determined by the overall use, complexity and materiality of models, as well as the size and complexity of the Bank's operations. The associated level of inherent model risk, as assessed by the Tiering methodology, determines the validation requirements in terms of frequency, extent and intensity.

CREDIT RISK MITIGATION

Collaterals

Collaterals are received in order to mitigate credit risk that may arise from the obligor's inability to fulfill his contractual obligations, at the loan origination or during the loan lifetime, either by consensus or after forced executions, auctions, etc..

Collaterals include all kind of assets and rights which are made available to the Bank either by their debtors or by third parties, in order to be used as complementary liquidity sources of relative loans.

In any case, the necessary legal control of the offered collaterals is carried out, in order to ensure their validity, as well as the possibility to be liquidated or to come into the possession of the Bank.

The mitigation tools applied by the Bank include two broad categories: intangible and tangible collaterals.

1. Intangible Collaterals – Guarantees

Intangible collaterals form framework of the obligations and rights that are typically included and described in specific contractual documents that bind the Bank and the borrowers during the lending process with specific commitments. The commitments involve a third party who substitutes for the primary debtor in the event of the latter's default or the primary debtor itself (natural or legal entities) to honor the contractual loan agreements and their prompt repayment to the Bank and on the other hand the Bank has the right to claim them.

The main type of intangible collateral used to protect the Bank against debtor insolvency is the Guarantee.

The guarantee constitutes a legal relationship between the guarantor and the lender (Bank), through which the guarantor assumes the responsibility for the repayment of the debt. It is a written agreement and requires the existence of a basic legal relationship between the Bank and the borrower (principal debt), which forms the relationship of principal to ancillary.

The guarantor can be an individual or a legal entity and the guarantee can be provided for future or conditional debt.

It is noted that the intangible collaterals include the guarantees of the Greek State which are taken into account in the calculation of the expected credit loss, unlike other intangible collaterals which are not counted in the calculation of the allowance of expected credit losses.

2. Tangible Collaterals

Tangible collaterals provide the Bank with the rights over an asset (movable or immovable), owned by the obligor or the guarantor, aimed to provide priority in the satisfaction of the creditor to the liquidation proceeds of the asset.

Tangible collaterals are distinguished between mortgages and prenotation on mortgages which are registered over immovable properties and pledges on movable assets (e.g., commodities, checks, bills of exchange) or on claims and rights.

In order to better secure credit facilities granted, all mortgage and pledged assets are covered by an insurance contract, with assignment of the relevant insurance contract to the Bank.

2.1. Mortgages – Prenotation on Mortgages

Mortgages are registered on real estate or immovable assets which can be liquidated as indicatively reported below:

- Residential Real Estate;
- Commercial Real Estate;
- Industrial Buildings;
- Land;
- Mines;
- Ships or aircraft and engines, whether or not movable
- Machinery or other facilities (engineering, mechanical, electrical, etc.), if they are permanently and consistently connected with the mortgaged estate.

Methods and Frequency of real estate property valuations

According to the Bank's Credit Policy, the existence and the valuation of mortgaged property are closely monitored. The property revaluations should be carried out on a yearly basis for all property types, except for cases where contract foresees something different, in cases of known changes on the property or in the business process, or in cases there are urban planning changes or any other considerable factors. In addition to the review of collateral values, the Group also validates such collateral values on an annual basis.

The initial valuations of a real estate property, provided as collateral, are carried out through on site appraiser visits and internal inspection.

Revaluations of properties which are collaterals to performing exposures, are carried out using the following methodologies:

- Alignment with the property price statistical index of the Bank of Greece, for the residential properties used as collateral on performing exposures of amount up to Euro 3 million.
- Expert input by the authorized engineers, after their visit to the residential property used as collateral or via desktop valuation, if the amount of exposure exceeds Euro 3 million.
- Alignment with the property price statistical index of commercial real estate (CRE), that has been developed by Alpha Astika Akinita S.A., taking into consideration the indices published by Bank of Greece, for certain categories of commercial property, used as collateral on performing exposures up to Euro 1 million.
- Expert input by authorised engineers, after their visit to the professional property used as collateral or by desktop valuation, in cases where the statistical index (CRE), does not cover the type of business property or the amount of exposure exceeds Euro 1 million.

The revaluations for property used as collateral to non-performing exposures, are carried out using the following methodologies:

- Alignment with the property price statistical index of the Bank of Greece, for residential properties and for non-performing exposures up to Euro 300 thousand.
- Alignment with the property price statistical index of commercial real estate (CRE), that has been developed by Alpha Astika Akinita S.A., taking into consideration the indices published by Bank of Greece, for certain categories of commercial property, used as collateral for non-performing exposure of amount up to Euro 300 thousand.
- Expert input by authorised engineers, after their visit to the property serving as collateral or by desktop valuation, provided

that either the amount of non-performing exposure that cover the property under valuation exceeds the amount of Euro 300 thousand or in the cases where the indices do not cover the type of the property under revaluation.

The Bank in the context of the credit control process performs on a regular basis and through proper sampling, audits for the procedures of implementation of the Bank Loan Collateral Policy, audits (back-testing) for the verification of property valuations. Audits concern the valuations based either on indices or individual assessments in order to ensure that the proper collateral valuation is captured in the Bank's core systems according to the values mentioned in the relevant Committee approvals.

2.2. Pledges

Pledges provide seniority rights over liquidation proceeds from a movable third party asset.

Pledges can be registered on movable assets, securities, rights or claims that have not been excluded or banned from exchanges and which can be liquidated, including:

- Raw materials, products or commodities;
- Machinery (movable);
- Bill of Lading;
- Bill of exchange;
- Cheques;
- Securities;
- Deposit; and
- Any type of claim that can be pledged.

Frequency of pledges revaluation

Depending on the right or the underlying asset on which a pledge is registered, the periodic revaluation varies from one month to one year.

3. Acceptable Value

During the approval process, the Bank calculates the value of the collaterals received based on the potential proceeds that could arise if and when these are liquidated, in order to reduce potential risk. This estimation is referred to as the acceptable guaranteed value of the collaterals provided to the Bank for the determination of which the quality of the assets as well as their market value are taken into account.

In this way, the ratio of acceptable guaranteed values are determined for each type of collateral, those are expressed as a percentage of their market value, nominal or weighted value, depending on the type of collateral.

CREDIT RISK EARLY WARNING SYSTEM

In order to optimise the management of Lending and, in particular, limit the loans whose status changes from Performing Loans (PLs) to Non-Performing Loans (NPLs), the Bank has developed the Credit Risk Early Warning System, which is defined as the aggregation of actions, processes and reports required to ensure the early identification of events, at borrower (corporate and individuals) and portfolio level, which may possibly lead to either an increase in NPLs due to the debtor's negligence or financial difficulty of a temporary or permanent nature, or an increase in exposures with significant increase in credit risk, as well as the relevant actions that must be taken in order to manage the borrowers concerned.

A comprehensive and effective Credit Risk Early Warning System is composed of the following stages:

- Identification of early warning triggers
- Action (timely and appropriate action taken)
- Monitoring of effectiveness of the procedure
- Quality control for the procedure's implementation

The perimeter to which the Credit Risk Early Warning System is implemented encompasses all performing exposures, as well up to 10 days-past-due for Retail (beyond 11 days-past-due assignments for management) and 30 days delinquent loans (PLs) for Wholesale which have not been forborne.

Additionally to the early identification and management of borrowers or loan portfolio segments with signals of deterioration, the Bank also monitors through the Early Warning System the loan portfolio, regardless of days past due, to ensure that the evolution and performance of the lending portfolio are in accordance with the Bank's and Group's Credit Risk Appetite.

The Bank enhanced its Early Warning (EW) system to introduce COVID-19-specific events and expanded policies to ensure their applicability to the COVID-19 general moratoria perimeter. Specifically:

- Separate monitoring of the COVID-19 general payment moratoria perimeter for Retail and Wholesale portfolio, irrespective of EBA status.
- Enhancement of borrower communication through interviews in order to detect early signs of financial difficulty, provide adequate support measures to viable distressed borrowers and classify exposures appropriately. Customer outreach has prioritised high-risk segments and customers under COVID-19 moratoria ahead of expiration.
- Enhancement of borrower-level EW triggers, such as inclusion in COVID-19 moratoria perimeter, expiration of COVID-19 moratoria.
- Enhancement of portfolio level EW metrics, such as one-month to expiration moratoria population, actual vs. target portfolio under EAT/TEPIX II.

The effectiveness of the Credit Risk Early Warning System is being monitored on a regular basis by three "lines of defense":

- The first "line of defense" consists of controls within the Units of the Bank that participate in the process.
- The second "line of defense", i.e. the Risk Management Unit, is responsible for ensuring on an ongoing basis and at least once per year, that the controls of the "first line of defense" are applied effectively, through the Credit Control Mechanism.
- The third "line of defense" is the internal audit function that carries out regular evaluations and proposes potential improvements.

ENVIRONMENTAL AND SOCIAL RISK

The assessment of the strict compliance with the principles of an environmentally and socially responsible financing towards legal entities has been integrated as well within the approval process, according to the applicable Credit Policy.

The main objective is the identification, at the origination of a loan, of potential risk arising from the operations of obligors of the Bank that may be connected with a damage to the environment or the society or with any direct threat of such a damage, having as a result a negative impact on the business operations and financial results of the Bank.

In this context, a relevant model for the assessment of Environmental and Social Risk is used, which, based on the business sector of the company and in relation to the purpose of financing, classifies the borrowers in risk zones (High, Medium, Low) in order to make targeted on-site visits (due diligence), aiming at further evaluation the undertaken environmental and social responsibility risk by the competent Credit Committee.

CREDIT RISK CONCENTRATION MANAGEMENT

Concentration Risk is a specific form of credit risk and arises due to the low degree of diversification between counterparties, products or group of counterparties, sectors, geographic regions, or collaterals. The Bank monitors on a regular basis concentration risk at sector level and at borrower/group of borrowers level as well through detail reporting which informs senior management and Committees of the Board of Directors.

The Bank categorizes the financed companies according to their NACE Rev.2 codes into Industry groups/Sectors, which are rated into risk zones. The Sectors ranking relative to their credit risk is carried out by an independent and certified company and is based on a predictive indicator that, focusing on future estimates rather than solely on past data, captures the risks and prospects of each sector. The Bank determines the Credit Risk Appetite per sector and manages the concentration risk by monitoring the evolution of its portfolio.

Additionally, the Bank manages concentration risk at borrower/group of borrower's level by setting and monitoring compliance with limits set both by regulatory guidelines and by internal policies that have been developed.

Regulatory limits are mandated externally as following:

- Hard Regulatory Limit is determined to 25% of CET 1 and no exception is allowed.
- Soft Regulatory Limit is set to 10% of CET 1, serving as a threshold above which, cases should be reported to the European Central Bank.

Apart from the above limits set by external/ regulatory guidelines, the Bank has developed internal Policies that set limits aiming at managing and monitoring the concentration risk at borrower/group of borrowers level, taking into account the total credit limits as well as the credit rating of Borrowers. It is noted that, the relevant Policy is approved by the Board of Directors through the Risk Management Committee.

In line with the supervisory framework, the Bank applies and complies with the regulatory directives regarding large exposures, while the capital requirements for single name and sector concentration risks are estimated in the context of Pillar 2 of Basel II.

DEFINITIONS

The following definitions are provided as guidance to tables that follow:

Public Sector

The Public Sector includes:

- The Greek Central Government;
- Local Authorities;
- Companies controlled and fully or partially owned by the State (excluding those engaged in commercial activity)

Past Due Exposures

An Exposure is past due if the counterparty's exposure is, materially, more than one day past due (sum of the principal, interests and charges/commissions due more than one day at an account level).

Non-Performing Exposures

An exposure is considered as Non-Performing when at least one of the following criteria apply at the time of the credit risk rating assessment:

- The exposure is more than 90 days past due (NPL): The amount due exceeds € 100 for Retail Exposures or € 500 for Wholesale Exposures and the amount due exceeds 1% of the total on balance sheet exposures. In particular, for overdraft facilities, an exposure is past due after having exceeded its approved limit.
- Legal actions have been undertaken by the Bank -Legal (NPL).
- The exposure is classified as Forborne Non-Performing Exposure (FNPL), as defined in the Implementing Regulation (EU) 227/9.1.2015.
- It is assessed as Unlikely to Pay (UTP).

When a Wholesale Banking borrower has an exposure that is more than 90 days past due and the amount of this exposure exceeds 20% of total exposures of the borrower, then all exposures of the borrower are considered as non-performing (Pulling Effect).

Performing Exposures

An exposure is considered as performing when the following criteria are met:

- The exposure is less than 90 days past due;
- No legal actions have been undertaken against the exposure;
- No unlikeliness to pay reported on its credit obligation;

- The exposure is not classified as impaired;

  or

- The exposure is classified as forborne performing exposure, as defined in the aforementioned Implementing Regulation (EU) 2015/227 of 9 January 2015.

Unlikeliness to Pay

An exposure is flagged as "Unlikely To Pay" (UTP) when it is less than 90 days past due and the Bank assesses that the borrower is unlikely to fully meet his credit obligations without the liquidation of collateral, regardless the existence of any past due amount or the number of days past due, with the exception of collaterals that are part of the production and trade chain of the borrower (e.g. properties for Real Estate companies, corporate shares for Holding companies).

For Wholesale Banking, the procedure is the following:

(a) Identification of events which when occur lead to the transfer of the exposure to Non-Performing status without requiring an assessment by any Credit Committee (Hard UTP Triggers),

(b) Identification of triggers which when occur, lead to borrower's credit assessment by the relevant Wholesale Banking Credit Committee in order to determine whether borrower's exposures should be classified as Non-Performing or not (Soft UTP Triggers). This assessment takes place when reviewing borrower's credit limits depending on its credit ratings and in accordance with Wholesale Banking Credit Manual. If a borrower is flagged as UTP, then his credit risk rating should be D (Default) according to Bank's rating system or Default for Borrowers assessed using Slotting Models. If a borrower flagged as UTP belongs to a group of companies, then the group should also be assessed by the competent Credit Committee for the existence or not of UTP trigger.

The Bank accounts for the COVID-19 impact on each borrower's ability to pay through consideration of deteriorating financials / income, market information (e.g. sector trends, loan exposures to other banks), early warning triggers, etc.

According to the EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (EBA/GL/2020/15 and EBA/GL/2020/02), the identification of past due amounts is based on the revised payment schedule. Institutions shall perform a UTP assessment, prioritizing exposures with past due balances in relation to the revised payment schedule.

In this context, the UTP assessment for the COVID-19 perimeter is based on the following principles:

- If an exposure is already classified as NPE at the time of application of the COVID-19 measures (e.g. payment moratorium), such classification is retained.
- The application of Hard UTP criteria (automatic classification to NPE) and Soft UTP criteria (subject to assessment by the competent Credit Committee) is performed according to the existing procedures, where the assessment is based upon the revised payment schedule under the COVID-19 moratoria. The evaluation of the Soft UTP criteria is based on reasonable supportable information with focus on the post-moratoria period, considering all measures taken and the potential impact on borrowers' creditworthiness.
- The probation period of exposures classified as forborne before the pandemic that are part of the COVID-19 moratoria shall be adjusted based on the duration of the enacted measures. Also, for the COVID-19 moratoria perimeter, the probation period of exposures already classified as NPE before the pandemic freezes (i.e. no curing from Stage 3 to Stage 2) over the duration of the moratoria period.

For Wholesale Banking exposures the following Hard UTP Triggers exist:

- Denouncement of loan agreement
- Liquidation of collaterals and initiation of foreclosure measures by the Bank when the borrower does not have operational cash flows for the repayment of his debt obligations (excluding e.g. checks).
- Legal actions, sale or judicial sale in order to collect the claim (e.g. foreclosure instead of debt collection).
- Withdrawal of a license of particular importance in companies that require public authorisation to carry out their activities such as banks and insurance companies. The same applies for technical and construction companies, telecommunications companies, pharmaceutical, mining, transport, food, chemical, petroleum, recycle, media etc.

- Refinancing/Extensions of loans whose lifetime exceeds the economic lifetime of the funded investment.
- There are strong indications that the borrower is unable to meet his debt obligations (e.g. termination of business).
- Fraud cases
- Excess of the minimum acceptable Loan to Value (LTV), as depicted contractually, for loans collateralised with securities, e.g. bonds, shares etc (Margin Financing).
- Disappearance of an active market for the debtor's financial instruments, hold by the Bank.
- Write-off of debts because of default
- Debt Forgiveness with or without forbearance (conditional or not) at least for the first 12 months since the debt forgiveness.
- The credit institution or the leader of consortium starts bankruptcy/insolvency proceedings (application for insolvency).
- A credit event is declared under the International Swaps and Derivatives Association - ISDA).
- Out-of-court settlement/negotiation between Banks and Borrower for settlement / debt repayment of borrowers that are under bankruptcy proceedings (application for the bankruptcy).
- The borrower has requested to enter into bankruptcy or insolvency status (application for bankruptcy).
- A Bank has initiated bankruptcy or insolvency proceedings (application for bankruptcy).

Additionally, for Wholesale Banking exposures the following Soft UTP Triggers exist:

- Exposures that were modified by providing a "balloon" payment while the initial terms of the loan agreement did not include this repayment method, as well as exposures that the initial terms of the loan agreement included "balloon" payment and were modified by including an increase of the "balloon" amount and simultaneously by reducing the current installment.
- Multiple modifications in the same exposure
- Deterioration of the leverage ratio (Debt to Equity)
- An exposure was purchased or sold with deep discount that reflects the low credit quality of the borrower.
- The debt service coverage ratio indicates that debt is not viable
- 5 Years Credit Default Swaps (CDS) above 1.000 bps in the last 12 months.
- Loss of an important customer or lessee representing a significant percentage of entity's turnover or the total property income, respectively.
- A turnover decrease resulting in a significant reduction of cash flows
- An affiliated customer, who represents a significant percentage of entity's turnover, has applied for bankruptcy.
- An external auditor report with restrictions or reservations that results to significant deterioration of key financial ratios of the borrower and to worsened estimated future cash flows of the borrower.
- It is expected that an exposure with repayment at maturity or a due installment cannot be refinanced under current market conditions.
- Disappearance of an active market for the debtor's financial instruments, not hold by the Bank.
- The borrower has breached the financial terms of the loan agreement
- There is significant deterioration of the borrower's sector activity prospects.
- Adverse changes in the ownership structure or the management of the company or serious administrative problems.
- A third party (excluding Banks) has started bankruptcy or insolvency proceedings (application for Bankruptcy).
- Overdue payments to Tax Authorities and Social Security Funds.

For Retail Banking, the procedure is the following:

(a) Identification of events which when occur lead to the transfer of the exposure to Non-Performing status without requiring an assessment by any Credit Committee (Hard UTP Triggers),

(b) Identification of triggers which when occur, lead to borrower's credit assessment by the relevant Retail Banking Credit

Committee in order to determine whether borrower's exposures should be classified as Non-Performing or not (Soft UTP Triggers). This assessment takes place at the date of a forbearance request. If an exposure is flagged as UTP, then it should be classified as Non-Performing in Bank's systems.

COVID-19 modifications, either public or private moratoria, should not be considered as a UTP trigger event. However, where the moratorium applies to exposures that were already classified as defaulted at the moment of the application of the moratorium, this classification will be maintained.

For exposures of the Covid-19 moratoria perimeter both Hard UTP and Soft criteria are assessed according to the existing process.

For Retail Banking exposures the following Hard UTP Triggers exist:

- A trial date has been set for filling for Bankruptcy L.3869/2010
- Fraud has been confirmed at the expense of the Bank.
- The borrower has passed away.
- Multiple forbearances for the same exposure within a 12 months' time period.
- An out-of-court settlement / negotiation is underway between banks and borrower for settlement / repayment of debts of borrowers who are under bankruptcy proceedings (application for bankruptcy).
- Denouncement of loan agreement.
- Collaterals liquidation and foreclosure procedures have been initiated by the Bank in case the borrower cannot repay its debt obligations with the existing operating cash flows (excluding e.g. checks).
- Legal actions, sale or forced sale actions have been initiated in order to collect the debt (e.g. foreclosure measures against debt collection).
- Debt Forgiveness with or without forbearance (conditional or not), at least for the first 12 months since the debt forgiveness.

Additionally, for Retail Banking exposures the following Soft UTP Triggers exist:

- Multiple forbearances in the same exposure
- The borrower has other exposures in the Bank in default.
- The borrower is unemployed.
- The borrower has applied for bankruptcy or insolvency (application for bankruptcy).
- The borrower is the sole owner of a company with exposures in default and for which he has provided personal guarantees.

It is noted that the Bank has adopted the new Definition of Default that applies from 1.1.2021, according to the EBA guideline (Article 178 of Regulation (EU) No 575/2013), adjusting its Policies and updating the Hard and Soft UTP triggers by implementing new ones (see par. New Definition of Default), for both the Retail and Wholesale Banking Portfolios.

Credit impaired exposures

An exposure is considered as Credit Impaired when the criteria specified by the definition of Non-Performing Exposures are met.

Default exposures

An exposure is considered as Default when the criteria specified by the definition of Non-Performing Exposures are met.

Allowance for expected credit losses

For credit risk reporting purposes, the allowance for expected credit losses of loans measured at amortised cost includes also the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) since the Bank, from credit risk perspective, monitors the respective adjustment as part of the provisions. These loans were recognized either in the context of acquisition of specific loans or companies (i.e. Emporiki Bank and Citibank's retail operations in Greece), or as a result of significant modification of the terms of the previous loan that led to derecognition. Relevant adjustment has been performed to the carrying amount of the loans before allowance for expected credit losses.

Collateral value

The collateral value taken into account is the latest market value available. In the case of immovable properties, collateral value is considered the lower amount between the prenotation amount and the market value of the real estate. Value of guarantees only includes the amount that exceeds the value of collaterals. All collateral values are capped at 100% of the outstanding amount of the loan.

EXPECTED CREDIT LOSS ESTIMATION METHODOLOGY

The Bank, at each reporting date, recognizes a provision for expected credit losses on loans and advances to customers not measured at fair value through profit or loss as well as for letters of guarantee, letters of credit and undrawn loan commitments.

The Loan Impairment Methodology is common and applicable for both the Wholesale and Retail Banking Portfolios.

Default definition

The Bank has adopted as default definition for accounting purposes, non-performing exposures (NPE) as defined in the Commission Implementing Regulation (EU) No 680/2014 of 16 April 2014.

The definition of Non-Performing Exposures is consistently used to develop models for estimating credit risk parameters (Probability of Default, Loss Given Default, Exposure at Default).

In addition, the definition of default is consistent with the one used for internal credit risk management purposes.

Portfolio Classification in Stages based on the Credit Risk (Staging)

Following an exposure's initial recognition, exposure is classified into stages based on its credit risk characteristics. The classification of loans in stages is based on the changes of the credit quality compared to its initial recognition.

Upon initial recognition of an exposure, the Bank must determine whether this exposure is considered as credit impaired (Credit Impaired at Initial Recognition).

The POCI category (Purchased or Originated Credit Impaired, POCI) includes the following:

- Exposures that at the time of purchase (Purchased) meet the criteria of non-performing exposures.
- Exposures that as per accounting rules are derecognized and a new exposure is recognized and for which the following apply (Originated): if the exposure was classified as impaired (hence NPE) prior to derecognition, the new exposure will continue to maintain this classification and it will be classified as POCI.

For exposures not classified as POCI, the classification in stages is performed as follows:

- **The Stage 1** includes performing credit exposures that have no significant increase in credit risk since the initial recognition date. The expected credit losses calculated are based on the probability of default within the next 12 months, and the assessment is carried out on a collective basis with the exception of borrowers assessed on an individual basis
- **The Stage 2** includes credit exposures with significant increase in credit risk since the initial recognition date but which are not non-performing. The expected credit losses calculated are lifetime credit losses and the assessment is carried out on a collective basis with the exception of borrowers assessed on an individual basis
- **The Stage 3** includes the non-performing / default exposures. The expected credit losses calculated are the lifetime losses and the assessment is performed on a collective or individual basis.

With regards to the POCI exposures, the expected credit losses calculated are the lifetime losses.

All possible movements between Stages of credit risk are presented below:

- An exposure which has been classified in Stage 1 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the credit risk has not deteriorated and the exposure is still performing, or in Stage 2, if the exposure is still performing but the credit risk has deteriorated, or in Stage 3 if the exposure is non-performing/default.
- An exposure which has been classified in Stage 2 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the exposure is performing and does not meet any of the criteria of "Significant increase in credit risk" and in particular, for case of Forborne Performing exposure, if the exit criteria from the 2-years probation period are met. It could also remain in Stage 2, if the credit risk has not substantially changed, or be transferred to Stage 3, if the exposure is non-performing/default.
- An exposure which has been classified in Stage 3 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the exposure is performing and does not meet any of the criteria of "Significant increase in credit risk", or transferred in Stage 2, if it is no longer considered as non-performing, or remain in Stage 3, if it is still non-performing/default

The Bank does not make use of the exemption provided by the standard for low credit risk exposures.

For classification purposes, for wholesale banking loan agreements, initial recognition date is the date of the most recent credit assessment reflecting the annual thorough credit risk review practice of the Bank.

Especially for exposures affected by the Covid-19 crisis, post model adjustments (PMAs) may be adjusted to reflect risks and other uncertainties not included in the underlying expected credit loss measurement models (ECL Models), taking into consideration that:

- Probability of Default is the primary indicator in order to determine deterioration since initial recognition.
- PD Models are not designed to cater for the economic circumstances that currently exist.

Significant Increase in Credit Risk

For the timely identification of significant increase in credit risk for an Exposure after the initial recognition (SICR) leading to the calculation of lifetime credit losses of the exposure instead of twelve months credit losses, the risk of default at the reference date is compared to the risk of default at the initial recognition date for all Performing Exposures, including those with no days past due (Delinquencies).

The assessment to determine whether an exposure shows significant increase in credit risk or not is based on the following three types of Indicators:

- **Quantitative Indicators:** They refer to the use of quantitative information and specifically to the comparison between the probability of default (PD) at the reference date and the probability of default at the initial recognition date. The assessment of significant increase in credit risk takes into account the absolute increase of PD between the reporting and the initial recognition date (which can range between 3 and 5 percentage point depending on the asset class of the loans) as well as the relative increase of PD between the reporting and the initial recognition date (doubling or tripling of PD, depending on asset class of the loan). For Wholesale exposures obligor rating is also taken into consideration. Absolute and relative thresholds determining the significant increase between reporting and initial recognition date are validated on an annual basis, in order to ensure a robust statistical discriminatory power.
- **Qualitative Indicators:** They refer to use of qualitative information which is not necessarily depicted in the probability of default, such as the assessment of an exposure as performing forborne ("FPL" within 2 years probation period according to EBA ITS) or as exposure with Financial Difficulty. Additional qualitative indicators for the Wholesale Banking portfolios and the Retail Banking portfolios are included in Early Warning Policy. According to the abovementioned policy and as per the assessment performed, an exposure may be considered to show significant increase in credit risk. Especially for Specialized Lending portfolios additional qualitative indicators are identified.
- **Backstop Indicators:** In addition to the above, and with a view to addressing cases where there is no evidence of significant credit risk deterioration based on the quantitative and qualitative indicators, exposures over 30 days past due are considered by definition to show a significant increase in credit risk.

Allowance for expected credit losses estimation

Exposures assessed on individual basis (Individual Assessment)

The Expected Credit Losses calculation is carried out either on an individual basis, taking into account the significance of the exposure, the fact that certain exposures do not share common credit risk characteristics and the existence or not of sufficient historical data, or on a collective basis.

For companies where the corporate guarantee from the parent company represents 100% of the exposure of the companies, or for other important interdependencies between group of companies, the assessment may be performed at a group level.

Exposures to Companies assessed on an individual basis are the following:

- Borrowers with at least one Non-Performing Exposure whose Customer overall credit Limit in the Bank exceeds the amount of Euro 1.5 million.
- Borrowers of the Shipping Division and the Structured Finance Division, regardless the overall credit limit with at least one Non-Performing Exposure.
- Exposures that do not share common risk characteristics or for which no relevant historical data that enables a collective analysis is available.

Any remaining Exposure to Companies is assessed collectively.

Exposures to Individuals are assessed individually, if they are Non-Performing Exposures (NPE), and if the following threshold, per portfolio, applies:

- Consumer Loans: Accounts of Consumer Credit Borrowers with total on balance exposures over € 500 thousand.
- Mortgage Loans: Accounts of Mortgage Credit Borrowers with on balance exposures over € 2 million.

Any remaining exposures to Individuals are assessed collectively.

Exposures assessed on collective basis (Collective Assessment)

Collective Assessment applies to credit exposures which are not assessed individually, i.e. exposures classified in Stage 1 and Stage 2 as well as non-performing exposures that do not meet the above criteria for individual assessment, after having been categorised based on similar credit risk characteristics by portfolio. For the classification of credit facilities into groups with similar credit risk characteristics, the followings are considered:

- Staging according to Credit Risk
- Type of Product
- Days Past Due
- Time in default
- Indication of unlikeliness to pay
- Modification of contractual terms for borrowers showing financial difficulty (Forbearance Measures)
- Modification Type
- Existence of Collateral taking into account the type and Loan to Value ratio
- Existence of Greek State Guarantee
- Partial Write-Off
- Credit Risk Rating
- Activity Sector
- Assets held for Sale

The groupings are reviewed on a regular basis to ensure that each group is comprised of homogenous exposures.

Calculation of allowance for expected credit losses

Allowance for expected credit losses is updated at each reporting date to reflect the changes in the credit risk since initial recognition and thus provide timely information on evolution of expected credit losses.

The measurement of Expected Credit Losses is performed as follows:

- For financial assets, a credit loss is the present value of the difference between:
  (a) the contractual cash flows and
  (b) the cash flows that the Bank expects to receive
- For undrawn loan commitments, Expected Credit Losses are equal to the present value of the difference between:
  (a) the contractual cash flows that will be due if the loan commitment is drawn down; and
  (b) the cash flows that the Bank expects to receive if this amount is disbursed.
- For letters of guarantee and letters of credit, the loss is equal to the expected payments to reimburse the holder for a credit loss that it incurs less any amounts that the Bank expects to receive from the holder.

Incorporation of forward-looking information

The Bank calculates allowance for expected credit losses based on the weighted probability of three alternative scenarios. More specifically, the Economic Research Division produces forecasts for the possible evolution of macroeconomic variables that affect the level of allowance for expected credit losses of loan portfolios under a baseline and under two alternative macroeconomic scenarios (an upside and a downiside one) and also produces the cumulative probabilities associated with these scenarios.

The macroeconomic variables affecting the level of allowance for expected credit losses are the Gross Domestic product (GDP), the unemployment rate and forward looking prices of residential and commercial real estates.

The yearly average for the period 2021-2024 of macroeconomic variables affecting both the Probability of Default and the expected loss given default for the calculation of allowance for expected credit losses as at 31.12.2020 are the following:

	2021 – 2024		
	Downside Scenario	**Baseline Scenario**	**Upside Scenario**
Real GDP growth	1,7%	3,6%	5,6%
Unemployment rate	16,1%	14,3%	12,4%
Change in Residential Real Estate (RRE)	1,0%	3,2%	5,4%
Change in Commercial Real Estate (CRE)	2,0%	3,8%	5,7%

Respectively, the yearly average for the period 2020-2023 of macroeconomic variables affecting the calculation of allowance for expected credit losses as at 31.12.2019 are the following.

	2020 - 2023		
	Downside scenario	**Baseline Scenario**	**Upside Scenario**
Real GDP growth	(0,2%)	1,6%	3,4%
Unemployment rate	16,1%	13,9%	11,8%
Change in Residential Real Estate (RRE)	0,7%	3,4%	6,3%
Change in Commercial Real Estate (CRE)	2,0%	3,6%	5,3%

The production of baseline scenario, supported by a consistent economic description, constitutes the most likely scenario according to the current economic conditions and the Bank's basic assessment of the course of the economy.

The cumulative probabilities of the macroeconomic scenarios for the Greek economy indicate that the economy performs better or worse than forecasts of the baseline scenario and the alternative scenarios, i.e. the upside and downside scenario. For each one of the alternative scenarios, the allowance for expected credit loss is calculated and weighted against the probability of each scenario in order to calculate the weighted expected credit loss.

The cumulative probability assigned to the baseline scenario remained 60%, while cumulative probability assigned to the downside and upside scenario remained 20% for each of the scenario.

480 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

If the assigned cumulative probability of the downside scenario was increased from 20% to 40%, Expected Credit Losses would increase by € 78.2 million as at 31.12.2020 (31.12.2019: € 84.0 million).

If the assigned cumulative probability of the upside scenario was increased from 20% to 40%, Expected Credit Losses would decrease by € 78.4 million as at 31.12.2020 (31.12.2019: € 83.9 million).

(In millions of Euro)

	Adverse Scenario		Upside Scenario	
	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Retail Exposures	**56**	**60**	**(56)**	**(60)**
Stage 1	2	1	(2)	(1)
Stage 2	18	14	(18)	(14)
Stage 3	36	44	(36)	(44)
Wholesale Exposures	**22**	**24**	**(22)**	**(24)**
Stage 1	3	7	(3)	(7)
Stage 2	3	3	(3)	(3)
Stage 3	16	14	(16)	(14)
Total	**78**	**84**	**(78)**	**(84)**

Credit risk parameters

Calculation of Expected Credit Loss is based on the following credit risk parameters which are developed through internal statistical models based on historical data:

- **Probability of Default (PD):**

  Wholesale portfolio

  It is an estimate of the probability of a borrower to default over a specific time horizon.

  For assessing the probability of default, the credit risk rating models assess a series of parameters that can be grouped as follows:

  - Financial Analysis: The Borrower's Financial Capacity (Liquidity Indicators, Debt to Revenue etc.)
  - Competitor's analysis: the borrower's comparative position in the market in which operates, mainly in relation to its competitors (mainly applicable to debtors of Wholesale Banking)
  - Current and historical debtor's behavioral data either towards the Bank or towards third parties (delinquencies, repayment behavior, etc.), and
  - Qualitative characteristics of the debtor (strong and sound management, management succession, appropriate facilities and equipment, etc.).

  Regarding Specialized Lending the Probability to Default is estimated on facility level based on dedicated expert based models.

  Retail portfolio

  It is an estimate of the probability of an account to default over a specific time horizon.

  For assessing the probability of default, credit risk behavioural models have been developed which assess a series of parameters that can be grouped as follows:

  - Qualitative data: Activity Sector, Number of Employees, Company Type
  - Loan characteristics: product applied for, loan term, loan amount, or financing purpose;
  - Behavioral data: payments during latest period of time, delinquencies (i.e. overdue amount, bucket etc), exposure, transaction type, credit limit usage.

  Credit Risk models/Ratings models constitute the main input in order to determine the probability of default. The Bank uses statistical models in order to analyze the collected data and make estimates of the remaining probability of default over the life of the exposures and how they will evolve over time based, among other things, on macroeconomic variables.

- **Exposure at default (EAD):** Exposure at Default is an estimate of the amount of the exposure at the time of the default taking into account: (a) expected changes in the exposure after the reporting date, including principal and interest payments; (b) the expected use of credit limits and (c) accrued interest. The approved credit limits that have not been fully disbursed represent a potential credit exposure and are converted into a credit exposure equal to the approved undrawn loan commitments multiplied by a Credit Conversion Factor (CCF). The Credit Conversion factor of credit exposure is calculated based on statistical models. The maximum period for which credit losses are calculated is the remaining contractual maturity of a financial instrument unless the Bank has the legal right to recall the financial instrument earlier. In particular, for Credit Cards and loan agreements to individuals, the maximum period is set at three years, while for revolving loans to Small Businesses, the corresponding maturity is set at four years. Regarding Wholesale Banking loan agreements, the period is set to one year, given the throrough credit review performed at least once a year. If the residual maturity of the loan agreements classified in Stage 2 was increased by one year, Expected Credit Losses would increase by € 5.2 million as at 31.12.2020.

  The Bank uses EAD models that reflect the characteristics of the portfolios.

- **Loss given default (LGD):** Loss given default is an estimate of the loss that will occur if the default occurs at a given time. It is based on the difference between the contractual cash flows due and those expected to be received, including the liquidation of collaterals, probability of cure and probability to modify which are both based on historical data.

  For unsecured loans, the Estimated Expected loss at the time of the default, takes into account expected recovery rates which vary throughout the recovery period as well as the probability of curing and probability to modify.

  Expected recoveries from tangible collaterals are based on the following inputs: the most recent (updated within the year) market value of the collateral, the time required for the liquidation or sale of the collateral (ranging between 1 to 4 years depending on the legal action status of the loan), the expected market value at liquidation /sale date based on the evolution of RRE/ CRE indices for the next 4 years, the expected recoveries through foreclosure process or sale as derived from historical data obtained for foreclosures and sales of collateral. the recovery rate is adjusted at the end to reflect value of preferential claims. Expected cash flows are discounted using the original effective interest rate.

  Last, it is noted that for exposures secured with tangible collaterals, the LGD may vary following changes of macroeconomic scenarios.

- **Management overlays:** Management overlays refer to temporary adjustments applied to allowance for expected credit losses, in the context of the preparation of financial statements in order to incorporate recent developments and information. The Bank implements a robust governance framework to review and support the management, calculation and application of these adjustments. The Bank's governance framework requires such adjustments to be well documented, controlled and appropriately approved. For 2020, management overlays incorporated the estimated impact from loan portfolio sales scenarios. For the calculation of the impact, the Bank took into account any factors that may delay the realization of the sales and the progress of the conditions for the completion of the sales.

Undrawn loan commitments

According to IFRS 9, these contracts fall within the scope for expected credit losses recognition.

In estimating the allowance for expected credit losses over the life of an undrawn loan commitment, the Bank assesses the expected part of the loan commitment that will be used throughout its expected life.

Inherent Model Risk

The Bank recognizing the inherent model risk, derived from the model complexity and aggregated model risk, has adopted a Model Risk management framework which includes the principles of credit risk models development policy and risk models validation framework. In this context, the independent Risk Models Validation division validates all credit risk models used for the calculation of IFRS 9 allowance for expected credit losses.

Governance

The Credit Risk Committee is responsible for approving the Expected Credit Losses as well as the methodologies developed by the Bank for calculating the expected credit losses (ECL Methodology) for loan portfolio.

The Board of Directors approves the Bank's Loan Impairment Policy through the Risk Management Committee.

EFFECT FROM THE COVID-19 PANDEMIC

Perimeter affected by the Covid-19 pandemic

The Bank, in order to support its customers who are affected or expected to be affected by the crisis due to the Covid-19 pandemic, has taken, and will continue to take, a series of measures. Support measures are provided to affected businesses and individuals, facing temporary payment difficulties and liquidity shortages, through both legislative and non-legislative support measures. These measures concern either new loans, in the context of strengthening the liquidity of small, medium and large businesses, as well as the self-employed, or modifications in the repayment schedules of existing loan of both businesses and individuals.

Moreover, the Bank actively participates in every effort planned and coordinated by the Greek Government, either through the competent Ministries or through the Hellenic Development Bank and its Funds (i.e. TEPIX) as well as other European institutions to support the Greek economy (European Investment Fund, COSME etc.).

The modifications granted to existing loans were treated by the Bank in line with the Guidelines issued by the European Banking Authority (hereinafter "EBA") "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/02, EBA/GL/2020/08 and EBA/GL/2020/15) that aim to provide clarity to the EU banking sector on how to handle in a consistent manner, aspects related to (i) the classification of loans in default and (ii) the identification of forborne exposures.

In this respect, provided that those measures are not borrower-specific, the payment moratorium is fixed for every borrower irrespective of the borrowers' specific financial circumstances and the Net Present Value ("NPV") loss is immaterial, modifications in payment schedules are not automatically classified as Distressed Restructuring (Forbearance) both under IFRS 9 and the definition of default.

In accordance with the Bank's accounting policy, these modifications are not considered significant and therefore no derecognition occurs.

The measure of temporary payment holidays is offered to customers operating or employed in sectors affected by the Covid-19 pandemic, which is assessed by the Bank, through the submission of a relevant request from the customer.

It is noted that this measure, based on relevant guidelines by the EBA as amended on 2.12.2020 (EBA/GL/2020/15), is applicable until 31.3.2021, meaning that approvals of customer requests for payment holidays are accepted until that date and for an overall length of the payment holiday up to 9 months.

Characteristics of private and public Moratoria

In order to support affected businesses and individuals, both legislative and non-legislative measures / actions have been undertaken by the Government and the Bank, according to the above guidelines by EBA.

The **supportive measures provided by the Bank** ("**Covid measures**") were the following:

For **Medium and Large corporates** operating in sectors or areas affected by the Covid-19 crisis and provided that they were performing (less than 90 days past due) as at February 28, 2020:

- Payment holiday for capital installments due from 1.3.2020 to 31.12.2020 to the end of the loan or distribution among the remaining installments.
- Installments that include interest and capital due from 1.3.2020 to 31.12.2020, could be distributed equally among the remaining installments of the loan.
- Extension of existing payment moratoria after 31.12.2020 and up to an overall length of 9 months, applicable before 31.3.2021.
- Capitalization of interest accrued until 31.12.2020 or another date as decided.
- Extension of the obligation to recycle revolving loans until 31.12.2020.

- Possibility of replacing post-dated checks, received as collateral, with other checks from the same issuer of a later date, after an updated creditworthiness control.
- For businesses with no payment moratoria during 2020, that were performing (less than 90 days past due) as at 30.11.2020, new payment holiday limited to a total period of 9 months, may be offered, applicable before 31.3.2021.

For **Small businesses** and self-employed operating in sectors or areas affected by the Covid-19 crisis and provided that they were performing (less than 90 days past due) as at February 28, 2020:

- Payment holiday for capital installments due from 1.3.2020 to 31.12.2020 at the end of the loan.
- For borrowers with fixed term loans possibility to capitalized installments due until 31.12.2020 or another date as decided.
- For businesses with no payment moratoria during 2020, that were performing (less than 90 days past due) as at 30.11.2020, new payment holiday limited to a total period of 9 months, may be offered, applicable before 31.3.2021.
- Extension of the obligation to recycle revolving loans until 31.12.2020
- Possibility of replacing post-dated checks received as collateral, with other checks from the same issuer of a later date, after an updated creditworthiness control.

For **individuals** that faced limitation or decrease in their income because they belong to sectors that are affected, and which have fixed term loans (consumer and mortgage), credit cards and open personal loans with less than 90 days past due as at February 28, 2020:

- Payment holiday of the installments due or the minimum amount due for cards and open personal loans until 31.12.2020.
- For individuals with no payment moratoria during 2020, that were performing (less than 90 days past due) as at 30.11.2020, new payment holiday limited to a total period of 9 months, may be offered, applicable before 31.3.2021.
- Capitalization of the contractual interest, during the suspension period, as well as any expenses (e.g. insurance premiums), in the balance of the loan on due dates.

All loan modifications are flagged in the Bank's systems, so that the Bank is able to monitor them.

The table below presents the loans for which the Bank proceeded within 2020 in the above mentioned supportive measures:

	Loans measured at amortised cost			Loans measured at fair value through profit or loss (FVPL)	Total
	Stage 1	Stage 2	Stage 3		
RETAIL LENDING	443.364	3.016.297	2.307.798		5.767.459
CORPORATE LENDING	1.371.291	612.851	416.091	55.209	2.455.442
TOTAL LOANS	1.814.655	3.629.148	2.723.889	55.209	8.222.901

There are no active private moratoria as of 31.12.2020.

As at 31.12.2020 the active implementations of the Bank included in the perimeter of loans with the Greek State guarantee (which amounts to 80%) are presented below:

	Loans measured at amortised cost			Total
	Stage 1	Stage 2	Stage 3	
SMALL BUSINESS LOANS LENDING	76.823	1.699		78.522
CORPORATE LENDING	853.440	58.320	9.440	921.200
TOTAL LOANS	930.263	60.019	9.440	999.722

Amendments in the loan impairment policy due to Covid-19 pandemic

The Bank Loan Impairment Policy has been amended, in line with the EBA Guidelines "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/08), to incorporate the distinct treatment of the exposures which are affected by the Covid-19 pandemic. The Bank, for these exposures, has included in its

484 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Policy the criteria for the the Forbearance Classification, the Unlikeliness-to-pay (UTP) assessment, the identification of Default and the Significant Increase in Credit Risk treatment.

According to the EBA Guidelines, the public and private moratoria, as a response to Covid-19 pandemic to the extent they are not borrower specific but rather addressed to broad ranges of product classes or customers, should not be automatically classified as forbearance measures or lead to default status. This type of restructuring should not be automatically considered as a distressed restructuring, on the contrary it has to be considered a suitable measure to give relief to borrowers, which are temporarily not able to serve their loan obligations due to Covid-19 disruptions

Adjustments in the calculation of allowance for expected credit losses

In order the Bank to cope with obligors who face temporary liquidity problems due to the Covid-19 crisis, established the following adjustments to the calculation of expected credit losses.

More specifically, in order to adress the delays anticipated in the liquidation of the collaterals, the expected time to sale increased by one year compared to 31.12.2019, both for the collectively assessed exposures and for the individually assessed exposures for which the recovery is not based on the operating cash flows (gone concern).

Additionally, the Bank has enhanced its credit rating assessment and risk parameter quantification processes to ensure they remain appropriate in the COVID-19 environment. More specifically, the Bank conducted an extensive sectoral analysis in order to inform its COVID-19-adjusted segmentation framework. The segmentation was used to identify high-risk segments for prioritisation in terms of the customer outreach. The feedback from the borrower campaign fed the Bank's:

- Rating assessments: Rating downgrades informed the SICR triggers and Stage 2 classification as well as the frequency of review based on the Risk Zone.
- Mitigating actions: Following customer feedback, the Bank offered appropriate credit mitigation strategies to viable borrowers, where necessary. In turn, this informed the Forbearance classification and eventual Stage 2 migration.

Moreover, necessary adjustments were applied to the results of the models used to calculate the expected credit loss. These adjustments reflect the risks and other uncertainties that are not included in the underlying credit risk models. The adjustments to the results of the existing models are approved by the credit risk committee. More specifically:

- Performing retail exposures under payment moratoria that are classified in high and satisfactory risk zones (average PD 6.9%), transferred from Stage 1 to Stage 2 and Lifetime ECL is calculated for the remaining maturity of the exposures as a result of respective qualitative evaluation for possible increase of credit risk.
- Temporary short-term modifications granted to Retail exposures that are no longer under payment moratoria and according to individual evaluation that has been performed are viable customers who are facing temporary liquidity problems with no indication of permanent financial difficulty, were classified in Stage 2 and Lifetime ECL is calculated for the remaining maturity of the exposures.
- For all loans that were already under modification terms and for which a Covid modification has been provided, based on the above mentioned measures that the Bank applied, the cure rate remained unchanged for the period of the Covid modification.
- In order to assess the impact of the pandemic on the cash flows of the borrowers for which the exposures are assessed on an individual basis for the estimation of expected credit losses, adjustments were made to the estimated credit losses depending on the sector of activity of the borrower.

For the purposes of determining the expected credit losses, the Bank calculates the expected cash flows based on the weighted probability of three scenarios. More specifically, the Bank produces forecasts for the possible evolution of macroeconomic variables that affect the level of expected credit losses of loan portfolios under a baseline and under two alternative macroeconomic scenarios (an upside and a downside) and produces the cumulative probabilities associated with these scenarios.

The macroeconomic variables affecting the level of expected credit losses are the Gross Domestic product (hereinafter "GDP"), the unemployment rate and forward-looking prices of residential and commercial real estates.

The Bank adjusted the existing scenarios during 1.1.2020, which at 31.12.2020, predict growth rates for 2020, ranging from -9% for the unfinished V- shaped (upside scenario) with a gradual return to the pre-Covid-19 uptrend, up to -11% for the quasi (imperfect) Nike Swoosh shape (downside scenario) with a significant stagnation in the domestic economic activity in the medium term.

This approach is due to the current situation, where increased uncertainty surrounds the domestic economic outlook. The negative impact of the Covid-19 pandemic on domestic growth is expected to be determined, inter alia, by:

a. the intensity and duration of the pandemic;

b. the scale and effectiveness of containment measures, combined with the fiscal and monetary policy measures;

c. the effect on spending and personal consumption due to lockdown and social distancing and

d. the extent of uncertainty in the supply chain.

The main features of these scenarios can be described as follows:

Baseline Scenario

The baseline scenario predicts a weaker recovery in comparison to the initial shock. This negative impact on domestic economic activity is estimated to come from:

- A demand-side shock that affected both exports of goods and services (Transport, shipping and tourism), given that the European Union is the most important export market for Greece, as well as the domestic consumption and investments. However, the decline in imports due to weakening domestic demand and falling oil prices has partially mitigated the negative effects on GDP growth in 2020. High uncertainty is expected to weigh on investment; however, this impact may be relatively limited given the current low share of investment in GDP.
- A supply-side shock, related to the lockdown measures in several sectors of the economy.
- Adverse, albeit temporary, confidence effects weighing on aggregate demand.

The broad-based fiscal response supports aggregate domestic demand and weakens the negative effects on the economic activity and confidence, while setting the stage for a swift, although partial, recovery in the medium-term.The dynamics of the baseline scenario could be divided into two parts:

- Firstly, the positive base effects in the Hotel Industry, the food services and the retail trade from the second quarter of the year onwards. A crucial parameter for their final effect is the speed and effectiveness of vaccination programs - not only in Greece, but especially in the tourists' countries, which will release travel from social distancing and travel restrictions.
- Secondly, the government's reform program combined with funding from the Recovery and Resilience Facility (RRF) mechanism can be a strong base for high growth rates. Greece is expected to receive from the activation of the EU-27 Recovery Plan ("Next Generation EU", NGEU) grants that correspond to 10.3% of the expected GDP for 2020 for the next years, resulting in the third highest ranking among EU-27 countries.

Regarding the real estate prices, their growth rate has been slowed down compared to the initial forecasts (December 2019), both for 2020 and cumulative for the period 2020-22, due to the worsening of the economic activity due to Covid-19 pandemic. The impact is reflected in parallel to the economic variables of unemployment and GDP. Besides, GDP's growth rate is included within the main determining factor of the real estate properties prices.

The aforementioned mild deceleration of Bank's assessment in the real estate properties prices for 2020 and afterwards(eg from 5.3% to 3.9% on an annual basis for the current year) is linked with the enrichment of our analysis with the historical data of the first quarter (+ 6.9% on an annual basis) and the second quarter (+ 4.1% on an annual basis) of the BoG index, a development that shows an inelasticity of residential real estate prices against GDP growth in the baseline recession.

Upside Scenario

In the upside scenario the pathway of the pandemic is shorter than initially expected. The economy is assumed to recover and return soon to its upward path to normality, also supported by the broad - based stimulus from fiscal and monetary policy responses.

The real estate prices maintain their pre-Covid-19 dynamic assisted also by other structural factors apart from the rise of construction activity.

Downside Scenario

The downside scenario features a negative imperfect Nike Swoosh shaped shock on the domestic economic activity (i.e. partial recovery of losses in GDP terms in a 3-year period), envisaging a steeper drop in 2020 and muted recovery dynamics over the medium-term. The scenario reflects higher intensity and persistence of the pandemic, interrelated with some combination of potential downside risks, with broader negative spillover effects across the economy. In this scenario real estate prices losing the increasing dynamic of prior years without, however, these changes receiving a negative sign.

The probabilistic weighting associated with the baseline scenario remained 60%, while the probabilistic weighting of the downside and upside scenario is 20% for each scenario.

Since the Bank's models are forward-looking and in order to ensure robust model performance and avoid pro-cyclicality and cliff effects, in the case of GDP the Bank has utilized the macroeconomic forecasts over the period 2020-2021 which are considered to be more representative.

In total, the expected credit loss due to the above adjustments in Bank's models results, incorporate at 31.12.2020 € 246 mn impact due to Covid-19.

(In millions of Euro)

	Retail Lending	Corporate Lending	Total
Performing Exposures	41	77	118
Non-Performing Exposures	51	77	128
Total	**92**	**154**	**246**

NEW DEFINITION OF DEFAULT

In the context of alignment with the regulatory guidelines, the Bank adopts the new Definition of Default that applies from 1.1.2021.

The main changes introduced by the new Definition of Default are presented as follows:

- Additional "Unlikeliness To Pay" trigger events such as Diminished Financial obligations (NPV Loss), Sale of Credit Obligations, Default to Subsidiaries.
- Change on the way of counting of Days Past Due meaning that hereafter the counting will be based on the existence of concecutive days of material past due.
- An additional three-month probation period from the moment the obligor is no longer materially past due and no indication of Unlikeliness To Pay occurs.

The Bank has decided since 2018 to align Default, NPE and IFRS 9 "Credit Impaired" perimeter. Additionally, the adoption of the new Definition of Default as at the time of the first implementation, namely at 1.1.2021, did not induce any impact on the Bank's financial figures.

Definition

A Default event is considered to have occurred, regarding a particular Borrower, when at least one of the following criteria has taken place:

1. Past Due Criterion

The Borrower is past due more than 90 consecutive days on any material amount of the credit obligation(s).

Particularly, for Alpha Bank Greece, exposures at Alpha Leasing and ABC Factors are taken into consideration at the calculation of the Past Due Criterion.

2. Unlikeliness to Pay (UTP) Criterion

The Bank considers that the Borrower is unlikely to pay its credit obligations without recourse by the Bank to actions such as realizing security.

Additionally the Default classification and the EBA classification should be aligned and thus any FNPL or NPL exposure is considered as Defaulted.

For Retail exposures, the above specified definition of Default is applied at the level of an individual credit facility.

For Non-Retail exposures, the definition of Default is applied at the obligor level meaning that when at least one of the above specified criteria are met, the Obligor is considered as Defaulted. The Past Due Criterion is applied both at facility and at obligor level for exposures classified as Non-Retail, in order to be able to identify exposures for which the Past Due Criterion is satisfied at facility level, but not at obligor level.

FORBEARANCE

Maintaining a healthy loan portfolio depends on the constant monitoring and assessment of the borrowers in order to allow early detection of future liquidity problems, which could affect the normal repayment of their obligations to the Bank.

The credit tools which are normally used by the Bank for managing the liquidity problems that borrowers are facing for repaying their obligations are the restructuring of debt through the renegotiation of the original terms and conditions of the loan agreement they have entered into.

The Executive Committee "Act 175/2/29.7.2020 of the Bank of Greece, has determined the supervisory framework for the management of loans in arrears and non-performing loans, over and above the already applicable requirements of Law 4261/2014, the CRR 575/2013, and delegated the decision authority to the Bank of Greece.

Furthermore, in the context of the Commission Implementing Regulation (EU) 2015/227 of the European Commision dated January 9, 2015 and the executive technical standards of the European Banking Authority, the Bank assumes the resulting regulatory obligations for forborne exposures.

Forbearance measures should be applied on the basis of the risk, cooperativeness and viability of each debtor and consist of concessions assessed to be robust and sustainable, through the renegotiation of the initial terms and conditions of the debt contract duly taking into account the causes of the debtor's financial difficulties.

Forbearance measures may be applied a) on the basis of a customer's request, b) in accordance with the Code of Conduct under Law 4224/2013, as currently is in force, which is a State initiative under the supervision of the Bank of Greece. Apart from the forbearance measures applied to existing Retail lending exposures, which are initiated by the Bank in accordance with the directives of the Executive Committee Acts of the Bank of Greece (No. 175/2/29/07.2020) and Arrears Resolution Process (ARP) of the Code of Conduct under L.4224/2013 as currently is in force, there are restructuring solutions according to the Legislative Framework. The existence of more favorable terms for renegotiating and modifying the terms and conditions of the bilateral arrangement between the Bank and the debtor (concession), who is facing or is about to face difficulties in meeting his financial commitments ("financial difficulty"), are defined with respect to:

- respective terms existing and applied to customer with no financial difficulty and
- corresponding terms existing in market for debtor with similar credit risk profile.

Financial Difficulty is defined as the situation in which borrowers are unable to meet or are going to face difficulties in meeting their obligations, according to the existing repayment schedule, due to the deterioration of their financial situation.

According to the EBA guidelines " on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis" (EBA / GL / 2020/15 and EBA / GL / 2020/02), exposures with deferred payments due to the COVID-19 crisis should not automatically be classified as tolerance measures, as long as they are not aimed at specific borrowers, but apply to a wide range of product or customer categories (as opposed to tailor-made individual debtors).

The aforementioned treatment of forbearance is – in consistence with the regulatory guidance – applied only when the following conditions are met:

- The moratoria are general, i.e. they are not creditor-specific, as the duration of the conditions are standardized for all debtors. That said, specific products may be provided to broader borrower categories. Similar payment relief measures are taken by other Greek banks.
- The measures provide solely for amendments to the payment schedule over a pre-determined, limited period of time, and do not alter other loan terms and conditions, such as interest rates.

- There is no material loss on the exposure in Net Present Value terms.
- The moratoria do not apply to new loan contracts granted after the date the moratoria were announced.
- The moratoria were launched in response to the COVID-19 pandemic and apply until 31 March 2021, and their total duration do not exceed 9 months.
- The creditworthiness of the borrower is not estimated to be significantly affected by the COVID-19 crisis in long term.

MONITORING OF FORBORNE EXPOSURES

Following the Executive Committee Act 42 / 30.5.2014, ("Act 42") as subsequently amended by the Act 47/9.2.2015 ("Act 47") and by the Act 102/30.8.2016 ("Act 102") 134/5.3.2018 and 136/2.4.2018 of the Bank of Greece, the Bank has undertaken a series of actions to ensure adherence to the supervisory obligations and requirements arising from the above Acts. These changes cover the following distinct sections:

- Adaptation of Information Systems of the Bank;
- Amendments of the existing processes, such as the customization of new types of forborne exposures according to what is provided in Act 42/47/102/134/136.
- Creation of data structures (Data Marts) aiming at:
  - Automation of the processes related to the production of both internal (Risk Management) and external (Supervisory) reports;
  - Perform analyses on the portfolio of the Bank; and
  - Production of Management Information Reporting (MIS)

WRITE-OFFS AND WRITE-DOWNS OF BAD DEBTS

Bad Debt Write-off is defined as the reduction of the gross carrying amount of a financial asset, when there is no reasonable expectation of recovery. The write-off refers to the accounting write-off of a debt or a portion of it, i.e. the removal of the financial asset or part of it from the balance sheet, which does not necessarily entail the waiver of the legal right to recover the debt. In the event that the Bank decides to waive its legal right to recover the debt, this is called **Debt Forgiveness** and this waiver may include either on or off-balance sheet items as well.

Bad Debt Write-down is defined as the definitive reduction of a debt or portion of it, as a result of a legally binding decision or agreement (court judgment, contractual agreement etc.), which is not further claimable. It is noted that this category encompasses **Definitive write-downs** which are unconditional and **Conditional Write-Downs** (Contingent Write-Down) subject to the achievement by the Customer of a specific performance (usually, upon the successful implementation of a specific repayment program). In the case of Definitive Write-downs, both the accounting and the legal reduction (Debt Forgiveness) take place immediately and simultaneously, whereas in the case of Contingent Write-downs, the accounting reduction takes place when the relevant decision is taken or when the agreement is concluded, while the legal reduction (Debt Forgiveness) takes place either simultaneously with the relevant decision or at a later (future) time, depending on the type of the condition.

Contingent Write-downs of debts are in turn classified into:

a. **Resolutive Condition**, i.e. the debt is accounting and legal write down at the time of reaching the agreement with the Debtor and is revived only in the event that the debtor does not pay the remaining amount and
b. **Condition Precedent**, i.e. the debt is legally written down if the Debtor repays the debt in accordance with the relevant agreement.

Indicative conditions for the submission of proposals for writing-off part or total amount of the exposure include, but are not limited to, the following:

- The relevant Agreements with the Customers have been terminated.
- Payment Orders have been issued against all liable parties to such Agreements.
- The actions regarding the investigation of immovable property have been completed without any results.

- The procedure for the registration of encumbrances.
- At least one real estate property has been auctioned, so that the preferential claims (through the final creditor's classification list) and, by extension, the Bank's potential losses, are finalised.
- In cases where the likelihood of further recovery of the debt is considered to be particularly low, due to:
  - the fact that the debtors are placed under special liquidation;
  - the proven existence of preferential claims of a significant amount and the adoption of a decision to cease litigation actions, in order to avoid non-collectable enforcement costs;
  - the fact that further litigation actions seeking collection of the claim is economically unprofitable (e.g. low-value collateral);

The write-off requires the existence of an equal amount of provision for impairment, established no later thanthe quarter preceding the submission of the proposal.

DUE FROM BANKS

Exposure to credit institutions relates to loans, interbank transactions (which include positions in derivatives) and International Trade activities. Following the basic rules of designation, monitoring and revision of corporate lending, boundaries are established by the relevant Credit Committees for the monitoring of credit risk for the overall exposure per credit institution counterparty, excluding positions related to bonds issued by them. The approved credit limits are monitored on a daily basis. The validity period of the limits is specified in the approval of the limits in accordance with the counterparty credit institutions rating from international credit rating agencies. In addition to the regular revisions of counterparty credit institutions limits, interim revisions may be carried out either due to circumstances associated with the trading activity of the Bank or due to markets conditions or problems associated with counterparty credit institutions. Trigger events for an extraordinary review are regularly monitored per counterparty in order to review the relevant limits when such trigger events exist. At each reporting date, a loss allowance for expected credit losses on due from banks is recognized. The loss allowance is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the receivable falls under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized. Due from bank's credit risk is assessed based on credit rating of rating agencies or internal credit rating of the counterparty when a loan exposure exists at bank level. The Bank defines as low credit risk all investment grade counterparties, for which it calculates a credit allowance equal to a 12-month expected credit loss (Stage 1). For counterparties which do not meet the criteria of investment grade, the assessment of the significant increase in credit risk for which calculation of lifetime expected credit losses is required (Stage 2), is based on the two following conditions (whichever occurs first):

- Downgrade by at least two notches of the counterparty credit rating between the reporting date and the initial recognition date
- The 12-month PD at reporting date is above 5% in absolute terms and has increased more than 50% compared to the respective PD existing at initial recognition date.

INVESTMENTS IN DEBT SECURITIES

Investments in debt securities relate to securities that are classified into investment security portfolio. If there is a loan relationship with the counterparty issuer at the time of classification of the security position as investment, the Corporate Credit Policy procedures apply. These positions are subject to Bank investment limits and issuer's limits and are monitored on a daily basis. At each reporting date, a loss allowance for expected credit losses on bonds, which are not measured at fair value through profit or loss, is recognized. The loss allowance is based on expected credit losses related to the probability of default within the next twelve months, unless there has been a significant increase in credit risk from the date of initial recognition in which case expected credit losses are recognized over the life of the instrument. In addition, if the debt securities fall under the definition of purchased or originated credit impaired (POCI) financial assets, a loss allowance equal to the lifetime expected credit losses is recognized. Credit risk of investment in debt securities is assessed based on credit ratings of rating agencies or internal credit rating in case of Greek corporate issuers for which loan exposure exists.

The Bank defines as low credit risk all investment grade securities, for which it calculates a credit allowance equal to a 12-month expected credit loss (Stage 1).For debt securities, which do not meet the criteria of investment grade, the assessment of the significant increase in credit risk for which calculation of lifetime expected credit losses is required (Stage 2), is based on the two following conditions (whichever occurs first):

- Downgrade by at least two notches of the counterparty credit rating between the reporting date and the initial recognition date
- The 12-month PD at reporting date is above 5% in absolute terms and has increased more than 50% compared to the respective PD existing at initial recognition date

In addition, the Bank is monitoring, the change in credit spreads since the initial recognition date. A change in the credit spread of the issue of more than 500bps since the initial recognition date is a trigger for the review of the debt instrument staging.

Depending on the outcome of the above review the debt instrument will remain at Stage 1 or be allocated at Stage 2, regardless of whether the primary staging criteria for allocation to Stage 2 have been triggered or not.

FINANCIAL ASSETS EXPOSURE TO CREDIT RISK

The maximum credit risk exposure per category of financial asset in which the Bank is exposed is depicted in the "Net exposure to credit risk" column in the table below.

	31.12.2020		
	Exposure before impairment	Provision for impairment losses	Net exposure to credit risk
A. Credit risk exposure relating to balance sheet items			
Balances with central banks	6,421,222		6,421,222
Due from banks	2,703,146	72,956	2,630,190
Loans and advances to customers:			
Loans measured at amortised cost	42,661,350	7,946,812	34,714,538
Loans measured at fair value through profit or loss	264,068		264,068
Advances to customers measured at amortised cost	299,196	36,995	262,201
Advances to customers measured at fair value through profit or loss	40,000		40,000
Total	**43,264,614**	**7,983,807**	**35,280,807**
Derivative financial assets	1,272,924		1,272,924
Trading securities:			
- Government bonds	29,154		29,154
Total	**29,154**	**-**	**29,154**
Securities measured at amortised cost:			
- Securities measured at amortised cost (Government bonds)	3,138,344	9,192	3,129,152
- Securities measured at amortised cost (other)	31,949	980	30,969
Total	**3,170,293**	**10,172**	**3,160,121**
Securities measured at fair value through other comprehensive income:			
- Securities measured at fair value through other comprehensive income (Government bonds)	3,551,341	5,427	3,545,914
- Securities measured at fair value through other comprehensive income (other)	1,612,916	8,712	1,604,204
Total	**5,164,257**	**14,139**	**5,150,118**
Securities measured at fair value through profit or loss:			
- Securities measured at fair value through profit or loss (other)	168,883		168,883
Total	**168,883**	**-**	**168,883**
Assets held for sale - Loans and receivables measured at amortised cost	602,465	459,147	143,318
Assets held for sale - Loans and receivables measured at fair value through profit or loss			
Total	**602,465**	**459,147**	**143,318**
Total amount of balance sheet items exposed to credit risk (a)	62,796,958	8,540,221	54,256,737
Other balance sheet items not exposed to credit risk	12,521,237	1,757,224	10,764,013
Total Assets	**75,318,195**	**10,297,445**	**65,020,750**
B. Credit risk exposure relating to off balance sheet items:			
Letters of guarantee, letters of credit and other guarantees	3,691,134	105,208	3,585,926
Undrawn loan commitments	4,088,802	1,464	4,087,338
Guarantees of bond loans issued by subsidiaries of the Bank	15,542		15,542
Total amount of off balance sheet items exposed to credit risk (b)	**7,795,478**	**106,672**	**7,688,806**
Total credit risk exposure (a+b)	**70,592,436**	**8,646,893**	**61,945,543**

492 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019		
	Exposure before impairment	Provision for impairment losses	Net exposure to credit risk
A. Credit risk exposure relating to balance sheet items			
Balances with central banks	862,657		862,657
Due from banks	3,406,563	73,624	3,332,938
Loans and advances to customers:			
Loans measured at amortised cost	41,961,390	7,644,492	34,316,898
Loans measured at fair value through profit or loss	315,932		315,932
Advances to customers measured at amortised cost	254,321	32,349	221,972
Total	**42,531,643**	**7,676,841**	**34,854,802**
Derivative financial assets	1,024,484		1,024,484
Trading securities:			
- Government bonds	17,861		17,861
Total	**17,861**	**-**	**17,861**
Securities measured at fair value through other comprehensive income:			
- Securities measured at fair value through other comprehensive income (Government bonds)	4,963,355	19,147	4,944,207
- Securities measured at fair value through other comprehensive income (other)	1,230,442	5,609	1,224,833
-Securities measured at amortised cost	1,078,143	7,413	1,070,730
Total	**7,271,939**	**32,169**	**7,239,771**
Securities measured at fair value through profit or loss:			
- Securities measured at fair value through profit or loss (other)	179,879		179,878
Total	**179,879**	**-**	**179,878**
Assets held for sale - Loans and receivables measured at amortised cost	1,744,911	1,313,223	431,688
Assets held for sale - Loans and receivables measured at fair value through profit or loss	25,056		25,056
Total	**1,769,967**	**1,313,223**	**456,744**
Total amount of balance sheet items exposed to credit risk (a)	57,064,992	9,095,858	47,969,134
Other balance sheet items not exposed to credit risk	11,818,686	1,806,628	10,012,058
Total Assets	**68,883,678**	**10,902,486**	**57,981,192**
B. Credit risk exposure relating to off balance sheet items:			
Letters of guarantee, letters of credit and other guarantees	3,666,251	104,654	3,561,597
Undrawn loan commitments	3,643,214	1,527	3,641,687
Guarantees of bond loans issued by the subsidiaries of bank	15,542		15,542
Total amount of off balance sheet items exposed to credit risk (b)	**7,325,007**	**106,181**	**7,218,826**
Total credit risk exposure (a+b)	**64,389,999**	**9,202,039**	**55,187,960**

493 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

LOANS AND ADVANCES TO CUSTOMERS

For credit risk disclosure purposes, the allowance for expected credit losses of loans measured at amortised cost include also the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) since the Bank, from credit risk perspective, monitors the respective adjustment as part of the provisions. These loans were recognized either in the context of acquisition of specific loans or companies (i.e. Emporiki Bank and Citibank's retail operations in Greece), or as a result of significant modification of the terms of the previous loan that led to derecognition. Relevant adjustment has also been performed at the carrying amount of loans before allowance for expected credit losses.

It is noted that the credit risk tables do not include the balances and allowance for expected credit losses of loans that have been classified as assets held for sale.

Loans per IFRS 9 stage (past due and not past due)

The following tables present past due and not past due loans, measured at amortised cost per IFRS 9 stage as well as loans that are measured at fair value through profit or loss, as at 31.12.2020 and as at 31.12.2019:

31.12.2020									
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
					Stage 1				
	Not past due	Past due	Net carrying amount	Value of collateral	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**-**	**-**	**-**	**-**	**5,522,515**	**236,895**	**5,759,410**	**23,631**	**5,735,779**
Mortgage					3,687,454	197,570	3,885,024	3,564	3,881,460
Consumer					468,440	25,594	494,034	5,127	488,907
Credit cards					725,223	8,129	733,352	11,240	722,112
Small Businesses					641,398	5,602	647,000	3,700	643,300
Corporate lending	**183,588**	**80,480**	**264,068**	**236,328**	**12,779,301**	**167,592**	**12,946,893**	**36,398**	**12,910,495**
Large corporate	183,349	75,654	259,003	236,050	8,635,066	49,394	8,684,460	18,153	8,666,307
SME's	239	4,826	5,065	278	4,144,235	118,198	4,262,433	18,245	4,244,188
Public sector	**-**	**-**	**-**	**-**	**42,295**	**747**	**43,042**	**253**	**42,789**
Greece					42,295	747	43,042	253	42,789
Other countries									
Total	**183,588**	**80,480**	**264,068**	**236,328**	**18,344,111**	**405,234**	**18,749,345**	**60,282**	**18,689,063**

494 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2020										
	Loans measured at amortised cost									
	Stage 2					Stage 3				
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	3,470,369	545,907	4,016,276	278,123	3,738,153	1,906,911	7,234,790	9,141,701	3,698,293	5,443,408
Mortgage	2,161,106	428,867	2,589,973	109,272	2,480,701	1,059,305	3,612,402	4,671,707	1,338,130	3,333,577
Consumer	384,240	45,297	429,537	78,752	350,785	328,221	1,299,226	1,627,447	1,014,718	612,729
Credit cards	106,203	43,648	149,851	32,117	117,734	12,635	208,830	221,465	135,216	86,249
Small Businesses	818,820	28,095	846,915	57,982	788,933	506,750	2,114,332	2,621,082	1,210,229	1,410,853
Corporate lending	1,076,692	78,227	1,154,919	31,426	1,123,493	1,094,737	2,849,173	3,943,910	1,872,490	2,071,420
Large corporate	659,948	41,096	701,044	20,179	680,865	497,443	1,101,354	1,598,797	673,083	925,714
SME's	416,744	37,131	453,875	11,247	442,628	597,294	1,747,819	2,345,113	1,199,407	1,145,706
Public sector	-	146	146	-	146	920	884	1,804	746	1,058
Greece		146	146		146	920	884	1,804	746	1,058
Other countries										
Total	4,547,061	624,280	5,171,341	309,549	4,861,792	3,002,568	10,084,847	13,087,415	5,571,529	7,515,886

31.12.2020							
	Loans measured at amortised cost						
	Purchased or originated credit impaired loans (POCI)					Total net carrying amount at amortised cost	Value of collateral
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount		
Retail lending	1,562,802	3,268,426	4,831,228	1,555,050	3,276,178	18,193,518	15,173,413
Mortgage	955,058	1,797,302	2,752,360	630,361	2,121,999	11,817,737	11,649,374
Consumer	399,836	761,822	1,161,658	498,425	663,233	2,115,654	932,346
Credit cards	2,534	41,119	43,653	31,560	12,093	938,188	12,149
Small Businesses	205,374	668,183	873,557	394,704	478,853	3,321,939	2,579,544
Corporate lending	255,735	566,227	821,962	450,348	371,614	16,477,022	10,370,884
Large corporate	146,870	131,233	278,103	99,192	178,911	10,451,797	5,849,925
SME's	108,865	434,994	543,859	351,156	192,703	6,025,225	4,520,959
Public sector	-	59	59	54	5	43,998	36,659
Greece		59	59	54	5	43,998	36,659
Other countries							
Total	1,818,537	3,834,712	5,653,249	2,005,452	3,647,797	34,714,538	25,580,956

 The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019									
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
					Stage 1				
	Not past due	Past due	Net carrying amount	Value of collateral	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending		**451**	**451**	**451**	**5,591,595**	**328,047**	**5,919,645**	**26,593**	**5,893,052**
Mortgage					3,775,352	282,497	4,057,851	2,977	4,054,874
Consumer		451	451	451	488,252	21,559	509,812	8,075	501,737
Credit cards					883,051	13,588	896,640	12,875	883,765
Small Businesses					444,940	10,403	455,342	2,666	452,676
Corporate lending	**166,237**	**149,244**	**315,481**	**265,623**	**11,970,582**	**280,774**	**12,251,356**	**128,504**	**12,122,852**
Large corporate	160,527	140,357	300,884	264,984	8,437,634	131,408	8,569,042	112,361	8,456,681
SME's	5,710	8,887	14,597	639	3,532,948	149,366	3,682,314	16,143	3,666,171
Public sector					**53,657**	**182**	**53,839**	**156**	**53,683**
Greece					53,657	182	53,839	156	53,683
Other countries									
Total	**166,237**	**149,695**	**315,932**	**266,074**	**17,615,834**	**609,003**	**18,224,840**	**155,253**	**18,069,587**

31.12.2019										
	Loans measured at amortised cost									
	Stage 2					Stage 3				
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**2,342,989**	**1,418,115**	**3,761,104**	**285,963**	**3,475,141**	**1,620,959**	**7,936,801**	**9,557,759**	**3,419,901**	**6,137,858**
Mortgage	1,372,930	1,196,647	2,569,577	94,728	2,474,849	581,667	4,308,398	4,890,065	1,250,276	3,639,789
Consumer	280,782	103,780	384,563	82,294	302,269	498,320	1,191,296	1,689,616	922,795	766,821
Credit cards	69,158	44,554	113,712	36,173	77,539	34,068	195,566	229,633	115,528	114,105
Small Businesses	620,119	73,134	693,252	72,768	620,484	506,904	2,241,541	2,748,445	1,131,302	1,617,143
Corporate lending	**634,090**	**162,115**	**796,205**	**29,824**	**766,381**	**1,168,761**	**2,690,417**	**3,859,177**	**1,803,635**	**2,055,542**
Large corporate	374,803	118,394	493,197	18,370	474,827	564,141	1,091,271	1,655,411	715,689	939,722
SME's	259,287	43,721	303,008	11,454	291,554	604,620	1,599,146	2,203,766	1,087,946	1,115,820
Public sector		**14**	**14**		**14**	**923**	**876**	**1,799**	**651**	**1,148**
Greece		14	14		14	923	876	1,799	651	1,148
Other countries										
Total	**2,977,079**	**1,580,244**	**4,557,323**	**315,787**	**4,241,536**	**2,790,643**	**10,628,094**	**13,418,735**	**5,224,187**	**8,194,548**

496 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019						
	Loans measured at amortised cost						
	Purchased or originated credit impaired loans (POCI)					Total net carrying amount at amortised cost	Value of collateral
	Not past due	Past due	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount		
Retail lending	**1,072,098**	**3,864,141**	**4,936,237**	**1,514,862**	**3,421,375**	**18,927,426**	**15,135,558**
Mortgage	514,861	2,307,320	2,822,181	610,600	2,211,581	12,381,093	11,734,397
Consumer	385,440	804,131	1,189,570	478,814	710,756	2,281,583	925,063
Credit cards	4,914	41,694	46,607	29,554	17,053	1,092,462	12,673
Small Businesses	166,883	710,996	877,879	395,894	481,985	3,172,288	2,463,425
Corporate lending	**272,580**	**548,588**	**821,167**	**434,352**	**386,815**	**15,331,590**	**9,763,475**
Large corporate	168,070	120,700	288,769	92,866	195,903	10,067,133	5,668,019
SME's	104,510	427,888	532,398	341,486	190,912	5,264,457	4,095,456
Public sector	**3,032**	**56**	**3,088**	**51**	**3,037**	**57,882**	**47,256**
Greece	3,032	56	3,088	51	3,037	57,882	47,256
Other countries							
Total	**1,347,710**	**4,412,785**	**5,760,492**	**1,949,265**	**3,811,227**	**34,316,898**	**24,946,289**

"Purchased or originated credit impaired loans" as at 31.12.2020 include loans amounting to € 985,514 (31.12.2019: € 864,067) which are not credit impaired/non performing.

497 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Loans by credit quality and IFRS 9 Stage

The following tables present loans measured at amortised cost by IFRS 9 Stage and credit quality, as well as loans that are measured at fair value through profit or loss by credit quality, as at 31.12.2020 and 31.12.2019.

31.12.2020						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
MORTGAGE						
Strong credit quality	3,614,349	124,715		92,469	3,831,533	
Satisfactory credit quality	267,972	1,422,441		202,359	1,892,772	
Watch list (higher risk)	2,703	1,042,817		288,899	1,334,419	
Default			4,671,707	2,168,633	6,840,340	
Carrying amount (before allowance for expected credit losses)	**3.885.024**	**2.589.973**	**4.671.707**	**2.752.360**	**13.899.064**	**-**
Allowance for expected credit losses	(3,564)	(109,272)	(1,338,130)	(630,361)	(2,081,327)	
Net Carrying Amount	**3,881,460**	**2,480,701**	**3,333,577**	**2,121,999**	**11,817,737**	**-**
Value of collateral	3,612,855	2,290,089	3,578,213	2,168,217	11,649,374	
CONSUMER						
Strong credit quality	367,873	11,465		15,037	394,375	
Satisfactory credit quality	126,148	115,174		43,767	285,089	
Watch list (higher risk)	13	302,898		149,783	452,694	
Default			1,627,447	953,071	2,580,518	
Carrying amount (before allowance for expected credit losses)	**494,034**	**429,537**	**1,627,447**	**1,161,658**	**3,712,676**	**-**
Allowance for expected credit losses	(5,127)	(78,752)	(1,014,718)	(498,425)	(1,597,022)	
Net Carrying Amount	**488,907**	**350,785**	**612,729**	**663,233**	**2,115,654**	**-**
Value of collateral	140,384	84,777	244,146	463,039	932,346	
CREDIT CARDS						
Strong credit quality	567,818	7,594		419	575,831	
Satisfactory credit quality	165,460	25,282		472	191,214	
Watch list (higher risk)	74	116,975		731	117,780	
Default			221,465	42,031	263,496	
Carrying amount (before allowance for expected credit losses)	**733,352**	**149,851**	**221,465**	**43,653**	**1,148,321**	**-**
Allowance for expected credit losses	(11,240)	(32,117)	(135,216)	(31,560)	(210,133)	
Net Carrying Amount	**722,112**	**117,734**	**86,249**	**12,093**	**938,188**	**-**
Value of collateral	278	7	11,829	35	12,149	
SMALL BUSINESSES						
Strong credit quality	484,029	1,238		8,688	493,955	
Satisfactory credit quality	152,028	234,569		29,139	415,736	
Watch list (higher risk)	10,943	611,108		80,737	702,788	
Default			2,621,082	754,993	3,376,075	
Carrying amount (before allowance for expected credit losses)	**647,000**	**846,915**	**2,621,082**	**873,557**	**4,988,554**	**-**
Allowance for expected credit losses	(3,700)	(57,982)	(1,210,229)	(394,704)	(1,666,615)	
Net Carrying Amount	**643,300**	**788,933**	**1,410,853**	**478,853**	**3,321,939**	**-**
Value of collateral	375,049	548,367	1,278,487	377,641	2,579,544	
LARGE CORPORATE						
Strong credit quality	6,544,751	25,240			6,569,991	67,617
Satisfactory credit quality	2,139,310	491,757		46,670	2,677,737	15,492
Watch list (higher risk)	399	184,047		15,340	199,786	41,527
Default			1,598,797	216,093	1,814,890	134,367
Carrying amount (before allowance for expected credit losses)	**8,684,460**	**701,044**	**1,598,797**	**278,103**	**11,262,404**	**-**
Allowance for expected credit losses	(18,153)	(20,179)	(673,083)	(99,192)	(810,607)	
Net Carrying Amount	**8,666,307**	**680,865**	**925,714**	**178,911**	**10,451,797**	**259,003**
Value of collateral	4,089,331	487,641	1,099,453	173,500	5,849,925	236,050

498 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2020						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
SME's						
Strong credit quality	1,741,049	37,012			1,778,061	
Satisfactory credit quality	2,520,416	374,123		10,886	2,905,425	
Watch list (higher risk)	968	42,740		118	43,826	
Default			2,345,113	532,855	2,877,968	5,065
Carrying amount (before allowance for expected credit losses)	**4,262,433**	**453,875**	**2,345,113**	**543,859**	**7,605,280**	
Allowance for expected credit losses	(18,245)	(11,247)	(1,199,407)	(351,156)	(1,580,055)	
Net Carrying Amount	**4,244,188**	**442,628**	**1,145,706**	**192,703**	**6,025,225**	**5,065**
Value of collateral	2,576,605	370,186	1,357,662	216,506	4,520,959	278
PUBLIC SECTOR						
Strong credit quality	5,976				5,976	
Satisfactory credit quality	37,066	146			37,212	
Watch list (higher risk)						
Default			1,804	59	1,863	
Carrying amount (before allowance for expected credit losses)	**43,042**	**146**	**1,804**	**59**	**45,051**	**-**
Allowance for expected credit losses	(253)		(746)	(54)	(1,053)	
Net Carrying Amount	**42,789**	**146**	**1,058**	**5**	**43,998**	**-**
Value of collateral	35,743	146	770		36,659	

499 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
MORTGAGE						
Strong credit quality	3,823,819	5,101		84,083	3,913,003	
Satisfactory credit quality	230,989	1,623,542		210,202	2,064,733	
Watch list (higher risk)	3,043	940,934		253,348	1,197,325	
Default			4,890,065	2,274,548	7,164,613	
Carrying amount (before allowance for expected credit losses)	**4,057,851**	**2,569,577**	**4,890,065**	**2,822,181**	**14,339,674**	
Allowance for expected credit losses	(2,977)	(94,728)	(1,250,276)	(610,600)	(1,958,581)	
Net Carrying Amount	**4,054,874**	**2,474,849**	**3,639,789**	**2,211,581**	**12,381,093**	
Value of collateral	3,730,690	2,201,900	3,651,644	2,150,163	11,734,397	
CONSUMER						
Strong credit quality	346,725	1,737		17,545	366,007	
Satisfactory credit quality	160,294	111,734		36,661	308,689	
Watch list (higher risk)	2,793	271,092		113,777	387,662	
Default			1,689,616	1,021,587	2,711,203	451
Carrying amount (before allowance for expected credit losses)	**509,812**	**384,563**	**1,689,616**	**1,189,570**	**3,773,561**	
Allowance for expected credit losses	(8,075)	(82,294)	(922,795)	(478,814)	(1,491,978)	
Net Carrying Amount	**501,737**	**302,269**	**766,821**	**710,756**	**2,281,583**	**451**
Value of collateral	135,490	76,179	256,464	456,930	925,063	451
CREDIT CARDS						
Strong credit quality	667,033	1,801		622	669,456	
Satisfactory credit quality	229,496	4,073		608	234,177	
Watch list (higher risk)	111	107,838		821	108,770	
Default			229,633	44,556	274,189	
Carrying amount (before allowance for expected credit losses)	**896,640**	**113,712**	**229,633**	**46,607**	**1,286,592**	
Allowance for expected credit losses	(12,875)	(36,173)	(115,528)	(29,554)	(194,130)	
Net Carrying Amount	**883,765**	**77,539**	**114,105**	**17,053**	**1,092,462**	
Value of collateral	539	4	12,095	35	12,673	
SMALL BUSINESSES						
Strong credit quality	309,345	505		4,044	313,894	
Satisfactory credit quality	136,291	212,117		23,821	372,229	
Watch list (higher risk)	9,706	480,630		66,910	557,246	
Default			2,748,445	783,104	3,531,549	
Carrying amount (before allowance for expected credit losses)	**455,342**	**693,252**	**2,748,445**	**877,879**	**4,774,918**	
Allowance for expected credit losses	(2,666)	(72,768)	(1,131,302)	(395,894)	(1,602,630)	
Net Carrying Amount	**452,676**	**620,484**	**1,617,143**	**481,985**	**3,172,288**	
Value of collateral	328,663	418,840	1,346,369	369,553	2,463,425	
LARGE CORPORATE						
Strong credit quality	6,030,608	41,393			6,072,001	52,125
Satisfactory credit quality	2,456,273	213,445		24,573	2,694,291	70,370
Watch list (higher risk)	82,161	238,359		15,569	336,089	39,856
Default			1,655,411	248,627	1,904,038	138,533
Carrying amount (before allowance for expected credit losses)	**8,569,042**	**493,197**	**1,655,411**	**288,769**	**11,006,419**	
Allowance for expected credit losses	(112,361)	(18,370)	(715,689)	(92,866)	(939,286)	
Net Carrying Amount	**8,456,681**	**474,827**	**939,722**	**195,903**	**10,067,133**	**300,884**
Value of collateral	3,953,589	414,006	1,143,551	156,873	5,668,019	264,984

500 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019						
	Loans measured at amortised cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	
SME's						
Strong credit quality	1,478,619	11,156			1,489,775	
Satisfactory credit quality	2,193,729	162,790		7,129	2,363,648	
Watch list (higher risk)	9,966	129,062		4,352	143,380	
Default			2,203,766	520,917	2,724,683	14,597
Carrying amount (before allowance for expected credit losses)	**3,682,314**	**303,008**	**2,203,766**	**532,398**	**6,721,486**	
Allowance for expected credit losses	(16,143)	(11,454)	(1,087,946)	(341,486)	(1,457,029)	
Net Carrying Amount	**3,666,171**	**291,554**	**1,115,820**	**190,912**	**5,264,457**	**14,597**
Value of collateral	2,366,525	236,801	1,276,008	216,122	4,095,456	639
PUBLIC SECTOR						
Strong credit quality	2,261				2,261	
Satisfactory credit quality	51,578	14			51,592	
Watch list (higher risk)						
Default			1,799	3,088	4,887	
Carrying amount (before allowance for expected credit losses)	**53,839**	**14**	**1,799**	**3,088**	**58,740**	
Allowance for expected credit losses	(156)		(651)	(51)	(858)	
Net Carrying Amount	**53,683**	**14**	**1,148**	**3,037**	**57,882**	
Value of collateral	46,506		750		47,256	

The amounts are presented in thousands of Euro unless otherwise indicated

Letters of guarantee, letters of credit and undrawn loan commitments by credit quality and IFRS 9 Stage.

31.12.2020					
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Letters of guarantee, letters of credit and other guarantees					
Strong credit quality	2,371,510	252			2,371,762
Satisfactory credit quality	648,794	196,019			844,813
Watch list (higher risk)	49,944	114,315			164,259
Default			325,842		325,842
Carrying amount (before allowance for expected credit losses)	**3,070,248**	**310,586**	**325,842**	**-**	**3,706,676**
Allowance for expected credit losses	(29,802)	(4,017)	(71,389)		(105,208)
Net Carrying Amount	**3,040,446**	**306,569**	**254,453**	**-**	**3,601,468**
Value of collateral of impaired letters of guarantee, letters of credit and other guarantees			51,033		51,033
Undrawn loan commitments					
Strong credit quality	3,160,991	8,871		744	3,170,606
Satisfactory credit quality	829,647	45,928		3,311	878,886
Watch list (higher risk)	8,440	30,671		199	39,310
Default					-
Carrying amount (before allowance for expected credit losses)	**3,999,078**	**85,470**	**-**	**4,254**	**4,088,802**
Allowance for expected credit losses	(1,274)	(189)		(1)	(1,464)
Net Carrying Amount	**3,997,804**	**85,281**	**-**	**4,253**	**4,087,338**
Value of collateral of impaired undrawn loan commitments					

31.12.2019					
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Letters of guarantee, letters of credit and other guarantees					
Strong credit quality	1,281,942				1,281,942
Satisfactory credit quality	1,074,440	18,117			1,092,557
Watch list (higher risk)	962,158	9,959			972,117
Default			335,177		335,177
Carrying amount (before allowance for expected credit losses)	**3,318,540**	**28,076**	**335,177**	**-**	**3,681,793**
Allowance for expected credit losses	(20,830)	(369)	(83,455)		(104,654)
Net Carrying Amount	**3,297,710**	**27,707**	**251,722**	**-**	**3,577,139**
Value of collateral of impaired letters of guarantee, letters of credit and other guarantees			44,532		44,532
Undrawn loan commitments					
Strong credit quality	2,821,830	430		370	2,822,630
Satisfactory credit quality	756,246	25,704		241	782,191
Watch list (higher risk)	10,065	28,281		47	38,393
Default					
Carrying amount (before allowance for expected credit losses)	**3,588,141**	**54,415**	**-**	**658**	**3,643,214**
Allowance for expected credit losses	(1,174)	(352)		(1)	(1,527)
Net Carrying Amount	**3,586,967**	**54,063**	**-**	**657**	**3,641,687**
Value of collateral of impaired undrawn loan commitments					

The value of the collaterals related to impaired exposures, as at 31.12.2020 amounts to € 10,307,913 (31.12.2019 € 10.477.978).

502 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Ageing analysis by IFRS 9 Stage and product line of loans

	31.12.2020								
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost				
	Retail lending	Corporate lending		Total	Retail lending				
					Mortgage Loans				
	Consumer	Large corporate	SME's		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current		183,349	239	183,588	3,684,437	2,067,520	930,342	866,245	7,548,544
1-30 days		15,683		15,683	197,023	226,846	142,536	103,539	669,944
31-60 days			4,343	4,343		93,177	85,596	53,619	232,392
61-90 days						93,158	183,214	99,495	375,867
91-180 days							74,347	23,064	97,411
181-360 days		1,807		1,807			92,891	34,608	127,499
> 360 days		58,164	483	58,647			1,824,651	941,429	2,766,080
Total	-	**259,003**	**5,065**	**264,068**	**3,881,460**	**2,480,701**	**3,333,577**	**2,121,999**	**11,817,737**
Value of collaterals		236,050	278	236,328	3,612,855	2,290,089	3,578,213	2,168,217	11,649,374

	31.12.2020									
	Loans measured at amortised cost									
	Retail lending									
	Consumer					Credit Cards				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	463,852	313,542	184,274	319,120	1,280,788	714,308	84,577	6,501	1,772	807,158
1-30 days	25,055	20,654	23,283	13,348	82,340	7,804	23,192	1,142	315	32,453
31-60 days		10,159	15,578	7,610	33,347		6,554	2,956	366	9,876
61-90 days		6,430	7,473	4,199	18,102		3,411	2,397	233	6,041
91-180 days			23,284	8,013	31,297			4,136	159	4,295
181-360 days			35,883	8,892	44,775			20,396	1,949	22,345
> 360 days			322,954	302,051	625,005			48,721	7,299	56,020
Total	**488,907**	**350,785**	**612,729**	**663,233**	**2,115,654**	**722,112**	**117,734**	**86,249**	**12,093**	**938,188**
Value of collaterals	140,384	84,777	244,146	463,039	932,346	278	7	11,829	35	12,149

503 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2020									
	Loans measured at amortised cost									
	Retail lending					Corporate lending				
	Small Business					Large corporate				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	637,810	762,635	418,386	177,790	1,996,621	8,617,065	640,407	368,996	133,783	9,760,251
1-30 days	5,490	19,024	11,009	3,500	39,023	49,242	26,836	131,828	12,579	220,485
31-60 days		4,811	10,440	3,318	18,569		5,588	1,862		7,450
61-90 days		2,463	6,336	1,818	10,617		8,034	19,434		27,468
91-180 days			14,231	1,604	15,835			13,975		13,975
181-360 days			14,670	1,823	16,493			101,214		101,214
> 360 days			935,781	289,000	1,224,781			288,405	32,549	320,954
Total	**643,300**	**788,933**	**1,410,853**	**478,853**	**3,321,939**	**8,666,307**	**680,865**	**925,714**	**178,911**	**10,451,797**
Value of collaterals	375,049	548,367	1,278,487	377,641	2,579,544	4,089,331	487,641	1,099,453	173,500	5,849,925

	31.12.2020									
	Loans measured at amortised cost									
	Corporate lending					Public Sector				
	SME's					Greece				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	4,127,547	406,433	439,215	63,534	5,036,729	42,043		725		42,768
1-30 days	116,641	30,970	194,020	13,349	354,980	746				746
31-60 days		4,036	23,082	3,139	30,257					
61-90 days		1,189	24,624	2,473	28,286		146			146
91-180 days			38,298	1,926	40,224					
181-360 days			16,098	2,041	18,139					
> 360 days			410,369	106,241	516,610			333	5	338
Total	**4,244,188**	**442,628**	**1,145,706**	**192,703**	**6,025,225**	**42,789**	**146**	**1,058**	**5**	**43,998**
Value of collaterals	2,576,605	370,186	1,357,662	216,506	4,520,959	35,743	146	770		36,659

504 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019										
	Loans measured at fair value through profit or loss (FVPL)				Loans measured at amortised cost					
	Retail lending	Corporate lending		Total	Retail lending					
					Mortgage Loans					
	Consumer	Large corporate	SME's		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	
Current		160,528	5,710	166,238	3,772,976	1,319,081	534,147	481,142	6,107,346	
1-30 days		75,418		75,418	281,898	715,464	287,075	286,060	1,570,497	
31-60 days						213,432	157,656	104,921	476,009	
61-90 days		46,079		46,079		226,872	413,989	268,234	909,095	
91-180 days		8,329		8,329			180,642	65,439	246,081	
181-360 days		10,530	8,887	19,417			197,301	55,700	253,001	
> 360 days	451			451			1,868,979	950,085	2,819,064	
Total	**451**	**300,884**	**14,597**	**315,932**	**4,054,874**	**2,474,849**	**3,639,789**	**2,211,581**	**12,381,093**	
Value of collaterals	451	264,984	639	266,074	3,730,690	2,201,900	3,651,644	2,150,163	11,734,397	

31.12.2019										
	Loans measured at amortised cost									
	Retail lending									
	Consumer					Credit Cards				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Current	480,773	225,000	261,836	288,213	1,255,822	870,617	47,978	22,412	3,578	944,585
1-30 days	20,964	53,534	51,046	33,604	159,148	13,148	21,419	12,145	1,889	48,601
31-60 days		15,815	34,493	16,956	67,264		5,016	7,144	871	13,031
61-90 days		7,920	29,926	14,860	52,706		3,126	8,331	968	12,425
91-180 days			48,424	22,970	71,394			11,926	1,361	13,287
181-360 days			32,012	14,735	46,747			11,677	1,291	12,968
> 360 days			309,084	319,418	628,502			40,470	7,095	47,565
Total	**501,737**	**302,269**	**766,821**	**710,756**	**2,281,583**	**883,765**	**77,539**	**114,105**	**17,053**	**1,092,462**
Value of collaterals	135,490	76,179	256,464	456,930	925,063	539	4	12,095	35	12,673

505 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019									
	Loans measured at amortised cost									
	Retail lending					Corporate lending				
	Small Business					Large corporate				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**
Current	442,532	554,286	437,315	141,019	1,575,152	8,325,604	358,476	427,160	154,591	9,265,831
1-30 days	10,144	55,746	31,861	10,402	108,153	131,077	22,096	231,087	5,538	389,798
31-60 days		7,239	27,489	3,448	38,176		93,907	7,145		101,052
61-90 days		3,213	27,275	4,186	34,674		348	6,868		7,216
91-180 days			60,161	9,901	70,062			41,171	4,132	45,303
181-360 days			39,081	5,394	44,475			15,485	343	15,828
> 360 days			993,961	307,635	1,301,596			210,806	31,299	242,105
Total	**452,676**	**620,484**	**1,617,143**	**481,985**	**3,172,288**	**8,456,681**	**474,827**	**939,722**	**195,903**	**10,067,133**
Value of collaterals	328,663	418,840	1,346,369	369,553	2,463,425	3,953,589	414,006	1,143,551	156,873	5,668,019

	31.12.2019									
	Loans measured at amortised cost									
	Corporate lending					Public Sector				
	SME's					Greece				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired loans (POCI)**	**Total**
Current	3,517,777	249,638	444,731	62,096	4,274,242	53,501		743	3,033	57,277
1-30 days	148,394	18,375	119,850	7,449	294,068	182	14			196
31-60 days		16,026	37,749	10,059	63,834					
61-90 days		7,515	41,863	2,308	51,686					
91-180 days			26,666	2,286	28,952			2		2
181-360 days			33,298	8,839	42,137					
> 360 days			411,663	97,875	509,538			403	4	407
Total	**3,666,171**	**291,554**	**1,115,820**	**190,912**	**5,264,457**	**53,683**	**14**	**1,148**	**3,037**	**57,882**
Value of collaterals	2,366,525	236,801	1,276,008	216,122	4,095,456	46,506		750		47,256

506 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of loans by IFRS 9 Stage

The following tables present the movement in the loans measured at amortised cost by IFRS 9 Stage for the years 2020 and 2019:

	31.12.2020														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2020	5,919,645	3,761,104	9,557,759	4,936,237	24,174,745	12,305,195	796,219	3,860,976	824,255	17,786,645	18,224,840	4,557,323	13,418,735	5,760,492	41,961,390
Changes for the year 1.1 - 31.12.2020															
Transfers to Stage 1 from Stage 2 or 3	1,315,969	(1,298,453)	(17,516)			789,787	(697,358)	(92,429)			2,105,756	(1,995,811)	(109,945)		
Transfers to Stage 2 from Stage 1 or 3	(1,447,134)	2,138,777	(691,643)			(1,294,084)	1,343,269	(49,185)			(2,741,218)	3,482,046	(740,828)		
Transfers to Stage 3 from Stage 1 or 2	(41,224)	(479,402)	520,626			(117,425)	(263,248)	380,673			(158,649)	(742,650)	901,299		
New loans originated or purchased	506,728			2,051	508,779	4,750,582			7,285	4,757,867	5,257,310			9,336	5,266,646
Derecognition of loans	(578)	(2,412)	(4,144)		(7,134)	(389,835)	(4,252)	(34,226)	(699)	(429,012)	(390,413)	(6,664)	(38,370)	(699)	(436,146)
Changes due to modifications that did not result in derecognition	(4,085)	(16,486)	(18,041)	(7,014)	(45,626)	(4,698)	(687)	(3,341)	79	(8,647)	(8,783)	(17,173)	(21,382)	(6,935)	(54,273)
Write-offs	(1,250)	(12,673)	(335,891)	(166,908)	(516,722)		(1,033)	(178,767)	(14,047)	(193,847)	(1,250)	(13,706)	(514,658)	(180,955)	(710,569)
Repayments, foreign exchange and other movements	(488,661)	(74,179)	130,551	66,862	(365,427)	(3,049,587)	(17,845)	62,013	5,148	(3,000,271)	(3,538,248)	(92,024)	192,564	72,010	(3,365,698)
Reclassification of loans to "Assets held for sale"															
Balance 31.12.2020	5,759,410	4,016,276	9,141,701	4,831,228	23,748,615	12,989,935	1,155,065	3,945,714	822,021	18,912,735	18,749,345	5,171,341	13,087,415	5,653,249	42,661,350
Allowance for expected credit losses	(23,631)	(278,123)	(3,698,293)	(1,555,050)	(5,555,097)	(36,651)	(31,426)	(1,873,236)	(450,402)	(2,391,715)	(60,282)	(309,549)	(5,571,529)	(2,005,452)	(7,946,812)
Balance of loans 31.12.2020	5,735,779	3,738,153	5,443,408	3,276,178	18,193,518	12,953,284	1,123,639	2,072,478	371,619	16,521,020	18,689,063	4,861,792	7,515,886	3,647,797	34,714,538

The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2019	**6,057,464**	**4,036,739**	**10,307,010**	**5,251,996**	**25,653,209**	**11,601,236**	**1,032,468**	**5,489,901**	**1,175,079**	**19,298,684**	**17,658,700**	**5,069,207**	**15,796,911**	**6,427,075**	**44,951,893**
Changes for the year 1.1 - 31.12.2019															
Transfers to stage 1 from stage 2 or 3	1,319,849	(1,298,843)	(21,006)			720,181	(714,083)	(6,098)			2,040,030	(2,012,926)	(27,104)		
Transfers to stage 2 from stage 1 or 3	(1,217,836)	2,190,149	(972,313)			(650,271)	706,829	(56,558)			(1,868,107)	2,896,978	(1,028,871)		
Transfers to stage 3 from stage 1 or 2	(45,396)	(965,081)	1,010,477			(209,293)	(189,273)	398,566			(254,689)	(1,154,354)	1,409,043		
New loans originated or purchased	233,445			7,571	241,016	3,664,967			72,129	3,737,096	3,898,412			79,700	3,978,112
Derecognition of loans	(2,267)	(5,776)	(39,565)	(88)	(47,696)	(47,311)	(1,472)	(273,240)	(60,342)	(382,365)	(49,578)	(7,248)	(312,805)	(60,430)	(430,061)
Changes due to modifications that did not result in derecognition	(7,529)	(61,444)	(86,130)	(46,580)	(201,683)	29,318	(486)	(7,457)	(1,197)	20,178	21,789	(61,930)	(93,587)	(47,777)	(181,505)
Write-offs	(1,329)	(27,185)	(658,528)	(299,329)	(986,371)			(320,850)	(97,969)	(418,819)	(1,329)	(27,185)	(979,378)	(397,298)	(1,405,190)
Repayments, foreign exchange and other movements	(413,500)	(107,174)	74,281	26,353	(420,040)	(2,803,632)	(37,764)	(39,369)	30,138	(2,850,627)	(3,217,132)	(144,938)	34,912	56,491	(3,270,667)
Reclassification of loans to "Assets held for sale"	(3,256)	(281)	(56,467)	(3,686)	(63,690)			(1,323,919)	(293,583)	(1,617,502)	(3,256)	(281)	(1,380,386)	(297,269)	(1,681,192)
Balance 31.12.2019	**5,919,645**	**3,761,104**	**9,557,759**	**4,936,237**	**24,174,745**	**12,305,195**	**796,219**	**3,860,976**	**824,255**	**17,786,645**	**18,224,840**	**4,557,323**	**13,418,735**	**5,760,492**	**41,961,390**
Allowance for expected credit losses	(26,593)	(285,963)	(3,419,901)	(1,514,862)	(5,247,319)	(128,660)	(29,824)	(1,804,286)	(434,403)	(2,397,173)	(155,253)	(315,787)	(5,224,187)	(1,949,265)	(7,644,492)
Balance of loans 31.12.2019	**5,893,052**	**3,475,141**	**6,137,858**	**3,421,375**	**18,927,426**	**12,176,535**	**766,395**	**2,056,690**	**389,852**	**15,389,472**	**18,069,587**	**4,241,536**	**8,194,548**	**3,811,227**	**34,316,898**

"Repayments, foreign exchange and other movements" of loans measured at amortised cost for the year 2019 includes an amount of € 12,735 relating to loans for which the Bank, in the context of renegotiation of their terms, participated in debt to equity agreements.

508 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of allowance for expected credit losses of loans by IFRS 9 stage

The following tables include the movement for the years 2020 and 2019 in the allowance for expected credit losses of loans measured at amortized cost:

	31.12.2020														
	Allowance for expected credit losses														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2020	26,593	285,963	3,419,901	1,514,862	5,247,319	128,660	29,824	1,804,286	434,403	2,397,173	155,253	315,787	5,224,187	1,949,265	7,644,492
Changes for the year 1.1 - 31.12.2020															
Transfers to stage 1 from stage 2 or 3	77,946	(74,480)	(3,466)			18,315	(12,931)	(5,384)			96,261	(87,411)	(8,850)		
Transfers to stage 2 from stage 1 or 3	(14,664)	99,368	(84,704)			(19,767)	23,492	(3,725)			(34,431)	122,860	(88,429)		
Transfers to stage 3 from stage 1 or 2	(346)	(56,677)	57,023			(2,524)	(32,199)	34,723			(2,870)	(88,876)	91,746		
Net remeasurement of expected credit losses (a)	(64,143)	56,154	28,101	3,159	23,271	(8,738)	3,357	46,118	(49)	40,688	(72,881)	59,511	74,219	3,110	63,959
Impairment losses on new loans (b)	7,624			(399)	7,225	19,899			(682)	19,217	27,523			(1,081)	26,442
Change in risk parameters (c)	(7,990)	(19,434)	637,296	213,914	823,786	(40,206)	21,296	129,331	16,203	126,624	(48,196)	1,862	766,627	230,117	950,410
Impairment losses on loans (a)+(b)+(c)	(64,509)	36,720	665,397	216,674	854,282	(29,045)	24,653	175,449	15,472	186,529	(93,554)	61,373	840,846	232,146	1,040,811
Derecognition of loans		(15)	(262)		(277)	(622)		(6,101)	(375)	(7,098)	(622)	(15)	(6,363)	(375)	(7,375)
Write offs	(1,250)	(12,673)	(335,891)	(166,908)	(516,722)		(1,033)	(178,767)	(14,047)	(193,847)	(1,250)	(13,706)	(514,658)	(180,955)	(710,569)
Foreign exchange and other movements	(139)	(83)	1,343	737	1,858	(58,366)	(380)	(3,164)	3,385	(58,525)	(58,505)	(463)	(1,821)	4,122	(56,667)
Change in the present value of the impairment losses			(21,048)	(10,315)	(31,363)			55,919	11,564	67,483			34,871	1,249	36,120
Reclassification of allowance for expected credit losses to "Assets held for sale"															
Balance 31.12.2020	23,631	278,123	3,698,293	1,555,050	5,555,097	36,651	31,426	1,873,236	450,402	2,391,715	60,282	309,549	5,571,529	2,005,452	7,946,812

The amounts are presented in thousands of Euro unless otherwise indicated

In the above table which presents the movement of the allowance for expected credit losses for the year 2020, "Impairment losses on loans" does not include an amount of € 22,187 (31.12.2019: € 77,427) which is related to impairment losses of loans classified as assets held for sale in the previous periods.

During 2020, the allowance for expected credit losses have been affected by the following movements:

- Transfer to Stage 1 from Stage 2 and Stage 3 of loans amount to € 2,105,756 due to the improvement of their creditworthiness compared to their initial recognition
- The impairment losses of loans classified in Stage 3 were affected by:
  - Incorporation in the calculation of the allowance for expected credit losses of non-performing portfolios for which the Bank is considering recovery strategies through sales affected by a number of variables.
  - The further deterioration of the portfolio remaining in Stage 3.

Finally, loans written off in 2020 amounted to € 710,569, and led to an equal reduction of allowance for expected credit losses. It is noted that loans that have been written off in 2020 but can still be legally claimed amounted to € 692,459.

	31.12.2019														
	Allowance for expected credit losses														
	Retail lending					Corporate lending and public sector					Total				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Balance 1.1.2019	**21,346**	**193,763**	**4,095,973**	**1,715,008**	**6,026,090**	**97,875**	**51,325**	**2,909,685**	**712,839**	**3,771,724**	**119,221**	**245,088**	**7,005,658**	**2,427,847**	**9,797,814**
Changes for the year 1.1 - 31.12.2019															
Transfers to stage 1 from stage 2 or 3	56,949	(50,735)	(6,214)			20,668	(18,988)	(1,680)			77,617	(69,723)	(7,894)		
Transfers to stage 2 from stage 1 or 3	(10,236)	177,692	(167,456)			(7,105)	14,717	(7,612)			(17,341)	192,409	(175,068)		
Transfers to stage 3 from stage 1 or 2	(447)	(82,084)	82,531			(5,664)	(11,570)	17,234			(6,111)	(93,654)	99,765		
Net remeasurement of expected credit losses (a)	(46,830)	14,432	85,146	(3,040)	49,708	(12,607)	2,018	81,804	(1,154)	70,061	(59,437)	16,450	166,950	(4,194)	119,769
Impairment losses on new loans (b)	1,511			(2,273)	(762)	18,531			(3,301)	15,230	20,042			(5,574)	14,468
Changes in risk parameters (c)	7,932	60,534	101,286	140,927	310,679	17,265	(7,847)	192,959	20,882	223,259	25,197	52,687	294,245	161,809	533,938
Impairment losses on loans (a)+(b)+(c)	**(37,387)**	**74,966**	**186,432**	**135,614**	**359,625**	**23,189**	**(5,829)**	**274,763**	**16,427**	**308,550**	**(14,198)**	**69,137**	**461,195**	**152,041**	**668,175**
Derecognition of loans	(7)	(96)	(1,844)	(128)	(2,075)	(327)	(18)	(124,985)	(9,360)	(134,690)	(334)	(114)	(126,829)	(9,488)	(136,765)
Write offs	(1,329)	(27,185)	(658,528)	(299,329)	(986,371)			(320,850)	(97,969)	(418,819)	(1,329)	(27,185)	(979,378)	(397,298)	(1,405,190)
Foreign exchange and other movements	(9)	(161)	(950)	3,626	2,506	24	187	(6,800)	3,697	(2,892)	15	26	(7,750)	7,323	(386)
Change in the present value of the impairment losses			(70,311)	(37,340)	(107,651)			21,415	8,345	29,760			(48,896)	(28,995)	(77,891)
Reclassification of allowance for expected credit losses to "Assets held for sale"	(2,287)	(197)	(39,732)	(2,589)	(44,805)			(956,884)	(199,576)	(1,156,460)	(2,287)	(197)	(996,616)	(202,165)	(1,201,265)
Balance 31.12.2019	**26,593**	**285,963**	**3,419,901**	**1,514,862**	**5,247,319**	**128,660**	**29,824**	**1,804,286**	**434,403**	**2,397,173**	**155,253**	**315,787**	**5,224,187**	**1,949,265**	**7,644,492**

The amounts are presented in thousands of Euro unless otherwise indicated

"Foreign exchange and other movements" in the movement of allowance for expected credit losses for year 2019 of loans measured at amortized cost includes an amount of € 12,166 which relates to impairment losses of loans for which the Bank, in the context of renegotiating their terms, participated in debt to equity agreements.

During 2019, the allowance for expected credit losses have been affected by the following movements:

- Transfer to Stage 1 from Stage 2 and Stage 3 of loans amount to € 2,040,030 due to improvement of the creditworthiness compared to their initial recognition and the improvement of macroeconomic indicators for the loans remaining in Stage 1.
- Impairment losses of loans classified in Stage 3 were affected by:
  - incorporation in the calculation of allowance for expected credit losses of the sale transactions in accordance with the Business Plan and,
  - the further deterioration of loans portfolio remaining in Stage 3

Finally, loans amounting to € 1,405,190 were written off in 2019, resulting in an equal reduction in allowance for expected credit losses. It is noted that loans that have been written off in 2019 but can still be legally claimed amounted to € 1,387,708.

Reconciliation of letters of guarantee, letters of credit and undrawn loan commitments by IFRS 9 Stage

The movement for the years 2020 and 2019 of letters of guarantee, letters of credit and undrawn loan commitments is presented in the tables that follow:

	31.12.2020				
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	6,906,681	82,491	335,177	658	7,325,007
Changes for the year 1.1 - 31.12.2020					
Transfers to Stage 1 from Stage 2 or 3	340,765	(324,378)	(16,387)		
Transfers to Stage 2 from Stage 1 or 3	(641,280)	649,948	(8,668)		
Transfers to Stage 3 from Stage 1 or 2	(5,853)	(1,653)	7,506		
New letters of guarantee, letters of credit and undrawn loan commitments	1,223,599				1,223,599
Foreign exchange, repayments and other movements	(754,586)	(10,352)	8,214	3,596	(753,128)
Balance 31.12.2020	7,069,326	396,056	325,842	4,254	7,795,478
Allowance for expected credit losses	(31,076)	(4,206)	(71,389)	(1)	(106,672)
Balance 31.12.2020	7,038,250	391,850	254,453	4,253	7,688,806

	31.12.2019				
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	6,312,787	245,905	324,843	832	6,884,367
Changes for the year 1.1 - 31.12.2019					
Transfers to Stage 1 from Stage 2 or 3	253,972	(245,963)	(8,009)		
Transfers to Stage 2 from Stage 1 or 3	(111,383)	120,362	(8,979)		
Transfers to Stage 3 from Stage 1 or 2	(23,739)	(8,021)	31,760		
New letters of guarantee, letters of credit and undrawn loan commitments	287,570				287,570
Foreign exchange, repayments and other movements	187,474	(29,792)	(4,438)	(174)	153,070
Balance 31.12.2019	6,906,681	82,491	335,177	658	7,325,007
Allowance for expected credit losses	(22,004)	(721)	(83,455)	(1)	(106,181)
Balance 31.12.2019	6,884,677	81,770	251,722	657	7,218,826

512 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of allowance for expected credit losses of letters of guarantee, letters of credit and undrawn loan commitments by IFRS 9 Stage

The Bank has recognized allowance for expected credit losses for the undrawn loan commitments, letters of credit and letters of guarantee, the reconciliation of which is presented in the following tables for the years 2020 and 2019:

	31.12.2020				
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	**22,004**	**721**	**83,455**	**1**	**106,181**
Changes for the year 1.1 - 31.12.2020					
Transfers to stage 1 from stage 2 or 3	4,223	(2,926)	(1,297)		
Transfers to stage 2 from stage 1 or 3	(2,171)	2,248	(77)		
Transfers to stage 3 from stage 1 or 2	(112)	(219)	331		
Net remeasurement of expected credit losses (a)	(2,919)	5,355	863		3,299
Impairment losses on new exposures (b)	1,359				1,359
Change in risk parameters (c)	8,736	(971)	(10,761)		(2,996)
Impairment losses (a)+(b)+(c)	**7,176**	**4,384**	**(9,898)**	**-**	**1,662**
Foreign exchange and other movements	(44)	(2)	(1,125)		(1,171)
Balance 31.12.2020	**31,076**	**4,206**	**71,389**	**1**	**106,672**

"Foreign exchange and other movements" includes a provision for a letter of guarantee given as collateral to cover credit risk in a subsidiary that was forfeited and transferred to the other loan and advances to customers.

	31.12.2019				
	Stage 1	Stage2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	**25,269**	**2,839**	**76,597**	**1**	**104,706**
Changes for the year 1.1 - 31.12.2019					
Transfers to stage 1 from stage 2 or 3	2,774	(2,292)	(482)		
Transfers to stage 2 from stage 1 or 3	(479)	529	(50)		
Transfers to stage 3 from stage 1 or 2	(296)	(331)	627		
Net remeasurement of expected credit losses (a)	(2,046)	591	9,027		7,572
Impairment losses on new exposures (b)	196				196
Changes in risk parameters (c)	(3,422)	(615)	2,733		(1,304)
Impairment losses (a + b + c)	**(5,272)**	**(24)**	**11,760**	**-**	**6,464**
Foreign exchange and other movements	8		(4,997)		(4,989)
Balance 31.12.2019	**22,004**	**721**	**83,455**	**1**	**106,181**

513 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Advances to customers

Advances to customers derive mainly from the Bank's commercial activity other than lending, including mainly receivables from letters of guarantee, receivables from credit cards and other receivables from banking activities. The calculation of allowance for expected credit losses for the receivables that are exposed to credit risk is being performed using the simplified approach, taking into account their lifetime (without being allocated into stages), as provided by IFRS 9.

The allowance for expected credit losses rate applied by the Bank was determined based on the assessment of allowance for expected credit losses taking into account the time that the aforementioned receivables, which are mainly short-term, remain due.

Advances to customers as of 31.12.2020 amounted to € 299,196 (31.12.2019: € 254,321), while allowance for expected credit losses, as at 31.12.2020, amounted to € 36,995 (31.12.2019: € 32,349).

The following table presents the reconciliation of advances to customers for the years 2020 and 2019:

Balance 1.1.2020	**254,321**
Repayments, foreign exchange and other movements	44,875
Balance 31.12.2020	**299,196**
Allowance for expected credit losses	(36,995)
Balance of advances to customers 31.12.2020	**262,201**

Balance 1.1.2019	**180,103**
Repayments, foreign exchange and other movements	74,218
Balance 31.12.2019	**254,321**
Allowance for expected credit losses	(32,349)
Balance of advances to customers 31.12.2019	**221,972**

The reconciliation of the allowance for expected credit losses for the years 2020 and 2019 is presented in the following tables:

Balance 1.1.2020	**32,349**
Impairment losses on advances to customers	3,173
Foreign exchange, write-offs and other movements	1,473
Balance 31.12.2020	**36,995**

Balance 1.1.2019	**23,542**
Impairment losses on advances to customers	7,322
Foreign exchange, write-offs and other movements	1,485
Balance 31.12.2019	**32,349**

514 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

PLEDGED COLLATERALS

Collaterals are received in order to mitigate credit risk that may arise from the borrower's inability to fulfill his contractual obligations.

Collaterals include all kind of assets and rights which are made available to the Bank either by its borrowers or by third parties, in order to be used as complementary liquidation sources of the relative loans.

The breakdown analysis of collaterals and guarantees received to reduce the credit risk exposure is summarized below:

Breakdown of collaterals and guarantees

	31.12.2020									
	Value of collaterals									
	Loans measured at fair value through profit or loss (FVPL)					Loans measured at amortised cost				
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees
Retail lending						14,162,542	211,132	799,739	15,173,413	3,664,142
Corporate lending	64,100	1,850	170,378	236,328	18,134	4,340,375	946,176	5,084,333	10,370,884	3,467,526
Public sector						485	65	36,109	36,659	445
Total	**64,100**	**1,850**	**170,378**	**236,328**	**18,134**	**18,503,402**	**1,157,373**	**5,920,181**	**25,580,956**	**7,132,113**

	31.12.2019									
	Value of collaterals									
	Loans measured at fair value through profit or loss (FVPL)					Loans measured at amortised cost				
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Value of Guarantees
Retail lending			451	451		14,243,016	179,996	712,546	15,135,558	3,845,424
Corporate lending	65,173	796	199,654	265,623	13,769	4,216,147	1,171,775	4,375,553	9,763,475	3,235,190
Public sector						467	81	46,708	47,256	445
Total	**65,173**	**796**	**200,105**	**266,074**	**13,769**	**18,459,630**	**1,351,852**	**5,134,807**	**24,946,289**	**7,081,059**

There are no cases of transfer or reassignment of collaterals received from borrowers for which an obligation to return them has been recognized.

Loan-to-value ratio (LTV)

The loan-to-value ratio of loans reflects the relationship between the loan and the value of the real estate held as collateral.

The table below presents the mortgage loan portfolio by LTV ratio.

	Loans measured at amortised cost	
	31.12.2020	31.12.2019
< 50%	1,279,326	1,154,749
50% - 70%	1,611,327	1,504,738
71% - 80%	1,013,711	959,389
81% - 90%	1,033,462	966,143
91% - 100%	2,909,327	3,016,465
101% - 120%	1,801,113	1,742,409
121% - 150%	1,432,652	1,725,593
> 150%	2,818,146	3,270,188
Total exposure	**13,899,064**	**14,339,674**
SIMPLE AVERAGE OF LTV	72%	75%

515 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

REPOSSESSED ASSETS

Policy of disposal of repossessed assets

Within 2018 the Group created a uniform management strategy for repossessed assets by setting up two new Committees and assigning to a Group Company the management of all the repossessed properties of the Bank and its Subsidiaries. When the Bank acquires the legal title of properties in the context of the management of non-performing exposures (NPEs), the respective company is in charge of monitoring the repossession procedures (asset on - boarding), determining the best property management strategy and assigning to the appropriate channels, within or outside the Group, the management of the properties.

Depending on the defined strategy, the property is classified for accounting purposes, in the appropriate category. The classification process is repeated periodically so that the classification of each property is updated based on its current status. Finally, there is continuous supervision and co-ordination of collaborating asset management channels on the implementation of the defined strategies as well as of the asset commercialization in accordance with the Group's policy and monitoring of their performance through appropriate Key Performance Indicators (KPIs).

Repossessed assets

	31.12.2020						
	Balance					Disposals during the year	
	Value of collaterals repossessed 31.12.2020	Of which in 2020	Accumulated impairment 31.12.2020	Of which in 2020	Net carrying amount of collaterals repossessed 31.12.2020	Net disposal value	Net gain/ (loss) on disposal
Real estate collateral	392,680	99,502	50,656	3,262	342,024	14,574	1,549
Other collaterals	6,276				6,276		90

	31.12.2019						
	Balance					Disposals during the year	
	Value of collaterals repossessed 31.12.2019	Of which in 2019	Accumulated impairment 31.12.2019	Of which in 2019	Net carrying amount of collaterals repossessed 31.12.2019	Net disposal value	Net gain/ (loss) on disposal
Real estate collateral	297,625	66,893	44,250	242	253,375	29,521	1,082
Other collaterals	4,774	569			4,774	3,245	10

The net carrying amount of the collaterals repossessed as of 31.12.2019 includes an amount of € 3.125 that relates to properties that were classified as "Assets held for sale" of the Bank.

516 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Loans and Allowance for expected credit losses by IFRS 9 Stage, industry and geographical region

	31.12.2020							
	Greece							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	-	5,708,375	3,998,268	9,104,835	4,805,760	23,617,238	5,536,374	18,080,864
Mortgage		3,836,892	2,573,469	4,636,821	2,735,964	13,783,146	2,067,664	11,715,482
Consumer		493,261	428,930	1,626,373	1,152,762	3,701,326	1,592,436	2,108,890
Credit cards		731,265	149,651	221,056	43,633	1,145,605	209,816	935,789
Small Businesses		646,957	846,218	2,620,585	873,401	4,987,161	1,666,458	3,320,703
Corporate lending	109,484	9,770,815	972,641	3,811,484	764,436	15,319,376	2,294,476	13,024,900
Financial institutions and other financial services		507,919	1,826	4,288	4,920	518,953	7,845	511,108
Manufacturing		3,385,070	246,444	1,096,217	232,450	4,960,181	699,939	4,260,242
Construction and real estate	53,934	1,134,963	195,415	542,381	95,612	1,968,371	325,626	1,642,745
Wholesale and retail trade	4,826	1,831,405	126,599	1,468,296	209,182	3,635,482	881,732	2,753,750
Transportation		530,528	67,655	62,694	8,742	669,619	40,752	628,867
Shipping	50,485	28,787	19,106	13,561	24,751	86,205	4,032	82,173
Hotels-Tourism		1,390,511	218,950	323,704	35,264	1,968,429	115,049	1,853,380
Services and other sectors	239	961,632	96,646	300,343	153,515	1,512,136	219,501	1,292,635
Public sector	-	43,042	146	1,804	59	45,051	1,053	43,998
Total	109,484	15,522,232	4,971,055	12,918,123	5,570,255	38,981,665	7,831,903	31,149,762

	31.12.2020							
	Other Countries							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	-	51,035	18,008	36,866	25,468	131,377	18,723	112,654
Mortgage		48,132	16,504	34,886	16,396	115,918	13,663	102,255
Consumer		773	607	1,074	8,896	11,350	4,586	6,764
Credit cards		2,087	200	409	20	2,716	317	2,399
Small Businesses		43	697	497	156	1,393	157	1,236
Corporate lending	154,584	3,176,078	182,278	132,426	57,526	3,548,308	96,186	3,452,122
Financial institutions and other financial services		1,517,392		9,652		1,527,044	208	1,526,836
Manufacturing		41,566			3	41,569	153	41,416
Construction and real estate	19,111	52,835	5,419	10,394	9,892	78,540	6,998	71,542
Wholesale and retail trade				23,141	5,150	28,291	10,138	18,153
Transportation	29,250	58,973	40,359	19,074		118,406	19,200	99,206
Shipping	106,223	1,485,708	136,500	68,641	8,594	1,699,443	42,222	1,657,221
Hotels-Tourism		2		49	23,150	23,201	11,263	11,938
Services and other sectors		19,602		1,475	10,737	31,814	6,004	25,810
Public sector	-	-	-	-	-	-	-	-
Total	154,584	3,227,113	200,286	169,292	82,994	3,679,685	114,909	3,564,776

 The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019							
	Greece							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**451**	**5,867,829**	**3,736,817**	**9,522,978**	**4,910,412**	**24,038,036**	**5,229,706**	**18,808,330**
Mortgage		4,009,290	2,548,812	4,858,119	2,806,468	14,222,689	1,947,060	12,275,629
Consumer	451	509,118	381,228	1,688,336	1,179,630	3,758,312	1,486,296	2,272,016
Credit cards		894,221	113,526	229,281	46,585	1,283,613	193,850	1,089,763
Small Businesses		455,200	693,251	2,747,242	877,729	4,773,422	1,602,500	3,170,922
Corporate lending	**122,238**	**9,195,484**	**554,306**	**3,798,721**	**759,704**	**14,308,215**	**2,259,881**	**12,048,334**
Financial institutions and other financial services		638,700	4,089	4,196	4,796	651,781	7,835	643,946
Manufacturing	15,961	3,264,037	78,154	1,118,016	232,790	4,692,997	695,955	3,997,042
Construction and real estate	52,125	1,379,470	184,910	612,119	91,983	2,268,482	383,099	1,885,383
Wholesale and retail trade	5,123	1,628,030	46,450	1,427,298	195,600	3,297,378	845,424	2,451,954
Transportation		270,615	4,486	58,396	26,026	359,523	35,841	323,682
Shipping	48,442	26,249	15,713	11,049	25,075	78,086	3,484	74,602
Hotels-Tourism		1,189,517	114,470	313,957	30,774	1,648,718	107,096	1,541,622
Services and other sectors	587	798,866	106,034	253,690	152,660	1,311,250	181,147	1,130,103
Public sector	**-**	**53,839**	**14**	**1,799**	**3,088**	**58,740**	**858**	**57,882**
Total	**122,689**	**15,117,152**	**4,291,137**	**13,323,498**	**5,673,204**	**38,404,991**	**7,490,445**	**30,914,546**

	31.12.2019							
	Other Countries							
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost						
	Net amount	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Carrying amount (before allowance for expected credit losses)	Allowance for expected credit losses	Net carrying amount
Retail lending	**-**	**51,816**	**24,287**	**34,781**	**25,825**	**136,709**	**17,613**	**119,096**
Mortgage		48,561	20,765	31,946	15,713	116,985	11,521	105,464
Consumer		694	3,335	1,280	9,940	15,249	5,682	9,567
Credit cards		2,419	186	352	22	2,979	280	2,699
Small Businesses		142	1	1,203	150	1,496	130	1,366
Corporate lending	**193,243**	**3,055,872**	**241,899**	**60,456**	**61,463**	**3,419,690**	**136,434**	**3,283,256**
Financial institutions and other financial services		1,419,356	8,967	1,676		1,429,999	60,186	1,369,813
Manufacturing	8,887	48,922		652	3	49,577	129	49,448
Construction and real estate	27,655	50,099	6,634	6,690	9,856	73,279	4,314	68,965
Wholesale and retail trade		2,675	3,229	20,061	2,119	28,084	10,510	17,574
Transportation	31,872	87,261	84,526			171,787	3,846	167,941
Shipping	124,829	1,427,011	138,543	29,950	9,046	1,604,550	33,916	1,570,634
Hotels-Tourism		1			24,296	24,297	11,850	12,447
Services and other sectors		20,547		1,427	16,143	38,117	11,683	26,434
Public sector	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Total	**193,243**	**3,107,688**	**266,186**	**95,237**	**87,288**	**3,556,399**	**154,047**	**3,402,352**

518 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Interest income from loans by loan category and IFRS 9 stage

The following tables present the interest income from loans for the year 2020 and 2019 by IFRS 9 Stage.

For loans classified in Stages 1 and 2, interest income is calculated by applying the effective interest rate to the gross carrying amount of the loan.

For loans classified in Stage 3, interest income is calculated by applying the effective interest rate on the amortized cost of the loan (i.e. gross carrying amount after allowance for expected credit losses), while for Purchased or Originated Credit Impaired loans (POCI) interest income is calculated by applying the adjusted effective interest rate to the amortized cost of the loan.

	31.12.2020					
	Loans measured at amortized cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total interest income	
Retail lending	222,563	133,670	272,937	117,867	747,037	26
Corporate lending	447,813	34,415	103,021	17,704	602,953	12,948
Public Sector	895		61	78	1,034	
Total interest income	**671,271**	**168,085**	**376,019**	**135,649**	**1,351,024**	**12,974**

	31.12.2019					
	Loans measured at amortized cost					Loans measured at fair value through profit or loss (FVPL)
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total interest income	
Retail lending	239,559	131,730	301,308	128,270	800,867	65
Corporate lending	466,549	41,863	109,317	16,483	634,212	13,959
Public Sector	931		67	24	1,022	
Total interest income	**707,039**	**173,593**	**410,692**	**144,777**	**1,436,101**	**14,024**

519 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

FORBORNE LOANS

The restructuring of loans is performed through renegotiation of the original contractual terms and include changes such as:

- Extension of the credit duration
- Write-off of a portion of borrower's amounts due
- Grace period for the principal and/or interest
- Decrease in interest rates

As a rule forbearance measures which are extended include a combination of the above amendments to the contractual terms.

In addition, in the context of renegotiations of the terms of loans granted, the Bank has participated in agreements for the exchange of debt with borrowers' equity shares. As at 31.12.2020, the Bank included in the portfolio measured at fair value through other comprehensive income shares with a fair value of € 6,233 (31.12.2019: € 4,730) which were acquired from respective transactions. The share that had been classified in the "Assets held for sale" in the previous years relates to the company "Forthnet" while during the current year no classification to the abovementioned caption exists (note 44).

Analysis of forborne loans by type of forbearance measure

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	**Loans measured at amortised cost**	**Total**
Interest only payment		126,782	126,782
Reduced payments scheme	5,224	2,560,692	2,565,916
Grace period	483	343,961	344,444
Loan term extension	57,676	4,198,002	4,255,678
Arrears capitalization	48,696	1,556,825	1,605,521
Partial write-off in borrower's obligations	1,789	954,423	956,212
Debt for equity transactions		15,285	15,285
Other	4,836	620,423	625,259
Total net carrying amount	**118,704**	**10,376,393**	**10,495,097**

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	**Loans measured at amortised cost**	**Total**
Interest only payment		122,104	122,104
Reduced payments scheme		3,272,273	3,272,273
Grace period	857	398,822	399,679
Loan term extension	66,317	4,719,434	4,785,751
Arrears capitalization		1,532,919	1,532,919
Partial write-off in borrower's obligations	48,442	751,770	800,212
Debt for equity transactions		21,220	21,220
Other	7,739	516,858	524,597
Total net carrying amount	**123,355**	**11,335,400**	**11,458,755**

520 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Forborne loans by product line

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Retail lending	-	8,453,387	8,453,387
Mortgage		5,577,224	5,577,224
Consumer		1,260,628	1,260,628
Credit cards		81,349	81,349
Small Businesses		1,534,186	1,534,186
Corporate lending	118,704	1,922,277	2,040,981
Large corporate	113,639	1,098,813	1,212,452
SME's	5,065	823,464	828,529
Public sector	-	729	729
Greece		729	729
Total net carrying amount	118,704	10,376,393	10,495,097

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Retail lending	-	9,102,653	9,102,653
Mortgage		5,963,824	5,963,824
Consumer		1,419,065	1,419,065
Credit cards		118,415	118,415
Small Businesses		1,601,349	1,601,349
Corporate lending	123,355	2,228,968	2,352,323
Large corporate	117,646	1,337,409	1,455,055
SME's	5,709	891,559	897,268
Public sector		3,779	3,779
Greece		3,779	3,779
Total net carrying amount	123,355	11,335,400	11,458,755

Forborne loans by geographical region

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Greece	55,550	10,172,362	10,227,912
Other countries	63,154	204,031	267,185
Total net carrying amount	118,704	10,376,393	10,495,097

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Greece	54,151	11,038,085	11,092,236
Other countries	69,204	297,315	366,519
Total net carrying amount	123,355	11,335,400	11,458,755

521 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Forborne loans according to their credit quality

	31.12.2020		
	Total amount of Loans	Total amount of Forborne Loans	Percentage of Forborne Loans (%)
Loans measured at fair value through profit or loss (FVPL)			
Past due	80,480	70,994	88
Not past due	183,588	47,710	26
Total net carrying amount	**264,068**	**118,704**	**45**
Value of collaterals	236,328	111,137	47
Loans measured at amortised cost			
Stage 1	18,749,345		
Stage 2	5,171,341	3,112,765	60
Stage 3	13,087,415	8,101,929	62
Purchased or originated credit impaired loans (POCI)	5,653,249	3,539,926	63
Carrying amount (before allowance for expected credit losses)	**42,661,350**	**14,754,620**	**35**
Stage 1 - Allowance for expected credit losses	60,282		
Stage 2 - Allowance for expected credit losses	309,549	216,473	70
Stage 3 - Allowance for expected credit losses	5,571,529	3,051,429	55
Allowance for expected credit losses for purchased or originated credit impaired loans (POCI)	2,005,452	1,110,325	55
Total net carrying amount	**34,714,538**	**10,376,393**	**30**
Value of collaterals	25,580,956	9,267,576	36

	31.12.2019		
	Total amount of Loans	Total amount of Forborne Loans	Percentage of Forborne Loans (%)
Loans measured at fair value through profit or loss (FVPL)			
Past due	149,695	107,971	72
Not past due	166,237	15,384	9
Total net carrying amount	**315,932**	**123,355**	**39**
Value of collaterals	266,074	116,924	44
Loans measured at amortised cost			
Stage 1	18,224,840		
Stage 2	4,557,323	3,532,918	78
Stage 3	13,418,735	8,280,667	62
Purchased or originated credit impaired loans (POCI)	5,760,492	3,541,620	61
Carrying amount (before allowance for expected credit losses)	**41,961,390**	**15,355,205**	**37**
Stage 1 - Allowance for expected credit losses	(155,253)		
Stage 2 - Allowance for expected credit losses	(315,787)	(231,978)	73
Stage 3 - Allowance for expected credit losses	(5,224,187)	(2,780,388)	53
Allowance for expected credit losses for purchased or originated credit impaired loans (POCI)	(1,949,265)	(1,007,439)	52
Total net carrying amount	**34,316,898**	**11,335,400**	**33**
Value of collaterals	24,946,289	9,483,991	38

522 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of the net value of forborne loans

	31.12.2020		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Balance 1.1.2020	**123,355**	**11,335,400**	**11,458,755**
Changes for the year 1.1 - 31.12.2020			
Forbearance measures during the year	11,052	625,583	636,635
Interest income	5,955	384,060	390,015
Repayment of loans (partial or total)	(13,569)	(425,255)	(438,824)
Loans that exited forbearance status during the year		(883,264)	(883,264)
Impairment losses		(662,801)	(662,801)
Disposal of forborne loans			
Remeasurment of fair value	(9,106)		(9,106)
Reclassification of loans to "Assets held for sale"			
Other movements	1,017	2,670	3,687
Balance 31.12.2020	**118,704**	**10,376,393**	**10,495,097**

	31.12.2019		
	Loans measured at fair value through profit or loss (FVPL)	Loans measured at amortised cost	Total
Balance 1.1.2019	**76,678**	**11,962,311**	**12,038,989**
Changes for the year 1.1 - 31.12.2019			
Forbearance measures during the year	73,952	1,394,024	1,467,976
Interest income	3,819	415,095	418,914
Repayment of loans (partial or total)	(7,591)	(517,088)	(524,679)
Loans that exited forbearance status during the year		(1,286,604)	(1,286,604)
Impairment losses		(315,778)	(315,778)
Disposal of forborne loans		(24,982)	(24,982)
Remeasurment of fair value	(23,503)		(23,503)
Reclassification of loans to "Assets held for sale"		(187,586)	(187,586)
Other movements		(103,992)	(103,992)
Balance 31.12.2019	**123,355**	**11,335,400**	**11,458,755**

523 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ANALYSIS PER RATING

Other financial instruments subject to credit risk

The following table presents the other financial instruments measured at amortised cost and at fair value through other comprehensive income as at 31.12.2020 and 31.12.2019 by IFRS 9 Stage and credit rating.

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Balances with central Banks					
AAA					
AA+ to AA-					
A+ to A-					
BBB+ to BBB-					
Lower than BBB-	6,421,222				6,421,222
Unrated					-
Carrying amount (before allowance for expected credit losses)	**6,421,222**	**-**	**-**	**-**	**6,421,222**
Allowance for expected credit losses					-
Net carrying amount	**6,421,222**	**-**	**-**	**-**	**6,421,222**
Value of collaterals					
Due from Banks					
AAA					
AA+ to AA-	673,408				673,408
A+ to A-	649,318				649,318
BBB+ to BBB-	900,706				900,706
Lower than BBB-	370,618				370,618
Unrated	39,135		69,961		109,096
Carrying amount (before allowance for expected credit losses)	**2,633,185**	**-**	**69,961**	**-**	**2,703,146**
Allowance for expected credit losses	(2,995)		(69,961)		(72,956)
Net carrying amount	**2,630,190**	**-**	**-**	**-**	**2,630,190**
Value of collaterals					-
Securities measured at fair value through other comprehensive income					
AAA	43,804				43,804
AA+ to AA-	592,715				592,715
A+ to A-	311,353				311,353
BBB+ to BBB-	1,327,388				1,327,388
Lower than BBB-	2,775,318	2,104			2,777,422
Unrated	86,849	24,726			111,575
Carrying amount (before allowance for expected credit losses)	**5,137,427**	**26,830**	**-**	**-**	**5,164,257**
Allowance for expected credit losses	(13,808)	(331)			(14,139)
Net carrying amount	**5,123,619**	**26,499**	**-**	**-**	**5,150,118**
Value of collaterals					
Securities measured at amortized cost					
AAA					
AA+ to AA-	30,700				30,700
A+ to A-					-
BBB+ to BBB-	325,009				325,009
Lower than BBB-	2,809,171				2,809,171
Unrated	4,050	1,363			5,413
Carrying amount (before allowance for expected credit losses)	**3,168,930**	**1,363**	**-**	**-**	**3,170,293**
Allowance for expected credit losses	(10,165)	(7)			(10,172)
Net carrying amount	**3,158,765**	**1,356**	**-**	**-**	**3,160,121**
Value of collaterals					

524 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019				
	Stage 1	**Stage 2**	**Stage 3**	**Purchased or originated credit impaired securities (POCI)**	**Total**
Balances with central Banks					
AAA					
AA+ to AA-					
A+ to A-					
BBB+ to BBB-					
Lower than BBB-	862,657				862,657
Unrated					
Carrying amount (before allowance for expected credit losses)	**862,657**				**862,657**
Allowance for expected credit losses					-
Net carrying amount	**862,657**	-	-	-	**862,657**
Value of collaterals					-
Due from Banks					
AAA					-
AA+ to AA-	613,209				613,209
A+ to A-	1,543,419				1,543,419
BBB+ to BBB-	671,031				671,031
Lower than BBB-	461,280				461,280
Unrated	47,663		69,961		117,624
Carrying amount (before allowance for expected credit losses)	**3,336,602**	-	**69,961**	-	**3,406,563**
Allowance for expected credit losses	(3,664)		(69,961)		(73,625)
Net carrying amount	**3,332,938**	-	-	-	**3,332,938**
Value of collaterals					
Securities measured at fair value through other comprehensive income					
AAA	43,533				43,533
AA+ to AA-	361,452				361,452
A+ to A-	86,521				86,521
BBB+ to BBB-	1,672,797				1,672,797
Lower than BBB-	3,930,089				3,930,089
Unrated	99,163	242			99,405
Carrying amount (before allowance for expected credit losses)	**6,193,555**	**242**	-	-	**6,193,797**
Allowance for expected credit losses	(24,744)	(12)			(24,756)
Net carrying amount	**6,168,811**	**230**	-	-	**6,169,041**
Value of collaterals					
Securities measured at amortized cost					
AAA					
AA+ to AA-					
A+ to A-					
BBB+ to BBB-					
Lower than BBB-	1,078,143				1,078,143
Unrated					
Carrying amount (before allowance for expected credit losses)	**1,078,143**	-	-	-	**1,078,143**
Allowance for expected credit losses	(7,413)				(7,413)
Net carrying amount	**1,070,730**	-	-	-	**1,070,730**
Value of collaterals					

 The amounts are presented in thousands of Euro unless otherwise indicated

Trading portfolio - Derivative financial assets - Securities measured at fair value through profit or loss

The following table presents the other financial instruments measured through profit or loss per credit rating.

	2020	2019
Trading securities		
AAA		
AA+ to AA-		
A+ to A-		
BBB+ to BBB-		
Lower than BBB-	29,154	17,490
Unrated		371
Net carrying amount	**29,154**	**17,861**
Value of collaterals		
Derivative financial assets		
AAA		
AA+ to AA-	106,467	3,262
A+ to A-	107,482	239,535
BBB+ to BBB-	16,862	13,004
Lower than BBB-	1,039,450	764,813
Unrated	2,663	3,870
Net carrying amount	**1,272,924**	**1,024,484**
Value of collaterals		
Securities measured at fair value through profit or loss		
AAA		
AA+ to AA-		
A+ to A-		
BBB+ to BBB-		
Lower than BBB-	340	55
Unrated	168.543	179.823
Net carrying amount	**168.883**	**179.878**
Value of collaterals		

526 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ANALYSIS OF FINANCIAL ASSETS PER IFRS 9 STAGE

Due from Banks

The following table presents the classification of Due from Banks per IFRS 9 Stage as of 31.12.2020 and 31.12.2019.

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired Receivables (POCI)	Total
Balance 31.12.2020					
Carrying amount (before allowance for expected credit losses)	2,633,185		69,961		2,703,146
Allowance for expected credit losses	(2,995)		(69,961)		(72,956)
Net carrying amount 31.12.2020	**2,630,190**	**-**	**-**	**-**	**2,630,190**

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired Receivables (POCI)	Total
Balance 31.12.2019					
Carrying amount (before allowance for expected credit losses)	3,336,602		69,961		3,406,563
Allowance for expected credit losses	(3,664)		(69,961)		(73,625)
Net carrying amount 31.12.2019	**3,332,938**	**-**	**-**	**-**	**3,332,938**

527 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Investment securities

i. Investment securities measured at fair value through other comprehensive income

The following table presents the classification of securities per IFRS 9 Stage and issuer's category as of 31.12.2020 and 31.12.2019:

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government Bonds:					
Allowance for expected credit losses	(5,105)				(5,105)
Fair Value	2,286,989				2,286,989
Other Government Bonds:					
Allowance for expected credit losses	(323)				(323)
Fair Value	1,258,925				1,258,925
Other securities:					
Allowance for expected credit losses	(8,380)	(331)			(8,711)
Fair Value	1,577,705	26,499			1,604,204
Total securities measured at fair value through other comprehensive income					
Allowance for expected credit losses	**(13,808)**	**(331)**	**-**	**-**	**(14,139)**
Fair Value	**5,123,619**	**26,499**	**-**	**-**	**5,150,118**

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government Bonds:					
Allowance for expected credit losses	(18,817)				(18,817)
Fair Value	3,524,379				3,524,379
Other Government Bonds:					
Allowance for expected credit losses	(331)				(331)
Fair Value	1,419,828				1,419,828
Other securities:					
Allowance for expected credit losses	(5,596)	(12)			(5,608)
Fair Value	1,224,604	230			1,224,834
Total securities measured at fair value through other comprehensive income					
Allowance for expected credit losses	**(24,744)**	**(12)**	**-**	**-**	**(24,756)**
Fair Value	**6,168,811**	**230**	**-**	**-**	**6,169,041**

In addition to the above securities, the portfolio of investment securities measured at fair value through other comprehensive income includes also shares of fair value of € 20,461 (31.12.2019: € 24,975).

 The amounts are presented in thousands of Euro unless otherwise indicated

ii. Investment securities measured at amortized cost

The following table presents the classification of securities per IFRS 9 Stage and issuer's category as of 31.12.2020 and 31.12.2019:

	31.12.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government bonds					
Carrying amount (before allowance for expected credit losses)	2,788,311				2,788,311
Allowance for expected credit losses	(9,132)				(9,132)
Net value	**2,779,179**	**-**	**-**	**-**	**2,779,179**
Other Government bonds					-
Carrying amount (before allowance for expected credit losses)	350,034				350,034
Allowance for expected credit losses	(61)				(61)
Net value	**349,973**	**-**	**-**	**-**	**349,973**
Other securities					-
Carrying amount (before allowance for expected credit losses)	30,585	1,363			31,948
Allowance for expected credit losses	(972)	(7)			(979)
Net value	**29,613**	**1,356**	**-**	**-**	**30,969**
Total securities measured at amortized cost					
Carrying amount (before allowance for expected credit losses)	**3,168,930**	**1,363**	**-**	**-**	**3,170,293**
Allowance for expected credit losses	**(10,165)**	**(7)**	**-**	**-**	**(10,172)**
Net value	**3,158,765**	**1,356**	**-**	**-**	**3,160,121**

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government bonds					
Carrying amount (before allowance for expected credit losses)	1,078,143				1,078,143
Allowance for expected credit losses	(7,413)				(7,413)
Net value	**1,070,730**	**-**	**-**	**-**	**1,070,730**
Total securities measured at amortized cost					
Carrying amount (before allowance for expected credit losses)	**1,078,143**	**-**	**-**	**-**	**1,078,143**
Allowance for expected credit losses	**(7,413)**	**-**	**-**	**-**	**(7,413)**
Net value	**1,070,730**	**-**	**-**	**-**	**1,070,730**

 The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of other financial assets (except loans) before allowance for expected credit losses per IFRS 9 Stage

The table below presents the movement of the carrying amount before allowance for expected credit losses of due from banks, the movement of the fair value of investment securities at fair value through other comprehensive income and securities measured at amortized cost including the allowance for expected credit losses by IFRS 9 Stage.

	31.12.2020														
	Due from banks					Investment securities measured at fair value through other comprehensive income					Securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	3,336,602	-	69,961	-	3,406,563	6,168,811	230	-	-	6,169,041	1,078,143	-	-	-	1,078,143
Changes for the year 1.1 - 31.12.2020															
Transfers to Stage 1 from Stage 2 or 3					-	228	(228)			-					-
Transfers to Stage 2 from Stage 1 or 3					-	(26,559)	26,559			-	(1,349)	1,349			-
Transfers to Stage 3 from Stage 1 or 2					-					-					-
New financial assets originated	5,673,937				5,673,937	2,893,394	-			2,893,394	4,021,422				4,021,422
Derecognition of financial assets					-	(3,212,125)	(742)			(3,212,867)	(1,924,002)				(1,924,002)
Interest on carrying amount before impairment					-	72,994	224			73,218	39,062	14			39,076
Changes due to modifications that did not result in derecognition					-					-					-
Write-off					-					-					-
Repayments, foreign exchange differences and other movements	(6,377,354)				(6,377,354)	(773,124)	456			(772,668)	(44,346)				(44,346)
Balance 31.12.2020	2,633,185	-	69,961	-	2,703,146	5,123,619	26,499	-	-	5,150,118	3,168,930	1,363	-	-	3,170,293

530 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019														
	Due from banks					Investment securities measured at fair value through other comprehensive income					Securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	**2,630,498**		**69,961**		**2,700,459**	**5,613,525**	**8,916**			**5,622,441**					
Changes for the year 1.1 - 31.12.2019															
Transfers to Stage 1 from Stage 2 or 3					-					-					-
Transfers to Stage 2 from Stage 1 or 3					-	(356)	356			-					-
Transfers to Stage 3 from Stage 1 or 2					-					-					-
New financial assets originated	3,673,145				**3,673,145**	4,800,043				**4,800,043**	1,074,258				**1,074,258**
Derecognition of financial assets					-	(3,890,679)	(1,313)			**(3,891,992)**					-
Interest on carrying amount before impairment					-	126,556	261			**126,817**	3,972				**3,972**
Changes due to modifications that did not result in derecognition					-					-					-
Write-off					-					-					-
Repayments, foreign exchange differences and other movements	(2,967,041)				**(2,967,041)**	(480,277)	(7,990)			**(488,267)**	(87)				**(87)**
Balance 31.12.2019	**3,336,602**	**-**	**69,961**	**-**	**3,406,563**	**6,168,812**	**230**	**-**	**-**	**6,169,041**	**1,078,143**	**-**	**-**	**-**	**1,078,143**

The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of the allowance for expected credit losses

The tables below present the movement of the allowance for expected credit losses of due from banks, investment securities measured at fair value through other comprehensive income and securities measured at amortized cost per IFRS 9 stage.

	31.12.2020														
	Due from banks					Investment securities measured at fair value through other comprehensive income					Securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Opening Balance 1.1.2020	3,664	-	69,961	-	73,625	24,744	12		-	24,756	7,413		-	-	7,413
Changes for the year 1.1 - 31.12.2020															
Transfers to Stage 1 from Stage 2 or 3					-	11	(11)			-					-
Transfers to Stage 2 from Stage 1 or 3					-	(42)	42			-	(2)	2			-
Transfers to Stage 3 from Stage 1 or 2					-	–	–			-					-
Remeasurement of expected credit losses (a)					-	(9)	364			355		8			8
Expected credit losses on new receivables/ securities (b)	962				962	6,735				6,735	9,343				9,343
Change in credit risk parameters (c)	(1,631)				(1,631)	(4,506)	(68)			(4,574)	(567)	(3)			(570)
Allowance for expected credit losses receivables/ securities (a)+(b)+(c)	(669)	-	-	-	(669)	2,220	296	-	-	2,516	8,776	5	-	-	8,781
Derecognition of financial assets					-	(13,118)	(8)			(13,126)	(6,022)				(6,022)
Foreign exchange and other movements					-	(7)				(7)					-
Closing Balance 31.12.2020	2,995	-	69,961	-	72,956	13,808	331	-	-	14,139	10,165	7	-	-	10,172

In the results of the year 2020, an additional increase in the allowance for expected credit losses has been recognized in Stage 1 amounting to € 92, which corresponds to the change of accumulated impairment allowance between the opening and the closing date resulting from the purchase of securities of FVOCI portfolio which have been agreed but not settled between these two dates. The said accumulated impairment allowance, depending on the valuation of securities, is recognized in “Other assets” or “Other liabilities”.

532 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019															
	Due from banks					Investment securities measured at fair value through other comprehensive income					Securities measured at amortized cost				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Opening Balance 1.1.2019	**5,312**	**-**	**69,961**	**-**	**75,273**	**54,857**	**241**	**-**	**-**	**55,098**	**-**	**-**	**-**	**-**	**-**
Changes for the year 1.1 - 31.12.2019															
Transfers to Stage 1 from Stage 2 or 3					-					-					-
Transfers to Stage 2 from Stage 1 or 3					-	(2)	2			-					-
Transfers to Stage 3 from Stage 1 or 2					-					-					-
Remeasurement of expected credit losses (a)					-		24			**24**					-
Credit t losses on new receivables/ securities (b)	210				**210**	15,282				**15,282**	7,413				**7,413**
Change in credit risk parameters (c)	(1,858)				**(1,858)**	(25,954)	(227)			**(26,181)**					-
Allowance forExpected credit losses on receivables/ securities (a)+(b)+(c)	**(1,648)**	**-**	**-**	**-**	**(1,648)**	**(10,672)**	**(203)**	**-**	**-**	**(10,875)**	**7,413**	**-**	**-**	**-**	**7,413**
Derecognition of financial assets					-	(19,440)	(28)			**(19,468)**					-
Foreign exchange and other movements					-	1				**1**					-
Closing Balance 31.12.2019	**3,664**	**-**	**69,961**	**-**	**73,625**	**24,744**	**12**	**-**	**-**	**24,756**	**7,413**	**-**	**-**	**-**	**7,413**

In 2019 income statement, an additional impairment on charge in Stage 1 credit risk expected losses have been recognized amounting to € 172, corresponding to the change in the accumulated impairment between the expiration and the beginning of the year for the purchase of securities in the FVOCI portfolio that had been agreed but not settled in those two dates. This accumulated impairment, depending on the valuation of the securities, is recognized in "Other assets" or "Other liabilities".

533 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following tables present the financial instruments exposed to credit risk by sectors of the counterparties.

FINANCIAL ASSETS EXPOSED TO CREDIT RISK - ANALYSIS BY INDUSTRY SECTOR

	31.12.2020										
	Financial Institutions and other financial services	Manufacturing	Construction & Real Estate	Wholesale and retail trade	Public sector Government Securities Derivatives	Transportation	Shipping	Hotels - Tourism	Services and other sectors	Retail lending	Total
Credit risk of exposures relating to balance sheet items:											
Balances with Central Banks	6,421,222										6,421,222
Due from banks	2,703,146										2,703,146
Loans and advances to customers	2,045,997	5,001,750	2,119,956	3,668,599	45,051	817,275	1,942,356	1,991,630	1,809,072	23,822,928	43,264,614
Derivative financial assets	231,611	29,302	86,839	2,125	860,878	58,028	1,771	1,558	812		1,272,924
Trading securities					29,154						29,154
Securities measured at fair value through profit or loss	168,883										168,883
Securities measured at fair value through other comprehensive income	1,128,888	242,721	19,970	67,534	3,551,342				153,803		5,164,257
Securities measured at amortized cost	17,487	8,787			3,138,345				5,675		3,170,293
Assets held for sale – Loans Portfolio	142	211,783	58,190	267,840		16,310	3,510	9,702	25,438	9,550	602,465
Total amount of balance sheet items exposed to credit risk (a)	**12,717,375**	**5,494,343**	**2,284,955**	**4,006,098**	**7,624,770**	**891,613**	**1,947,637**	**2,002,890**	**1,994,800**	**23,832,478**	**62,796,958**
Other balance sheet items not exposed to credit risk	4,371,563	1,604	108,729					11,000	8,028,341		12,521,237
Total assets	**17,088,938**	**5,495,947**	**2,393,684**	**4,006,098**	**7,624,770**	**891,613**	**1,947,637**	**2,013,890**	**10,023,141**	**23,832,478**	**75,318,195**
Credit risk of exposures relating to off-balance sheet items:											
Letters of guarantee, letters of credit and other guarantees	931,450	565,782	979,833	537,599	191,972	64,140	11,229	62,389	273,064	73,676	3,691,134
Undrawn loan commitments	183,117	885,792	188,662	799,406	51	52,119	3,755	84,506	127,514	1,763,880	4,088,802
Guarantees provided for bonds issued by Bank's subsidiaries	15,542										15,542
Total amount of off-balance sheet items exposed to credit risk (b)	**1,130,109**	**1,451,574**	**1,168,495**	**1,337,005**	**192,023**	**116,259**	**14,984**	**146,895**	**400,578**	**1,837,556**	**7,795,478**
Total credit risk exposures (a+b)	**13,847,484**	**6,945,917**	**3,453,450**	**5,343,103**	**7,816,793**	**1,007,872**	**1,962,621**	**2,149,785**	**2,395,378**	**25,670,034**	**70,592,436**

534 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019										
	Financial Institutions and other financial services	Manufacturing	Construction & Real Estate	Wholesale and retail trade	Public sector Government Securities Derivatives	Transportation	Shipping	Hotels - Tourism	Services and other sectors	Retail lending	Total
Credit risk of exposures relating to balance sheet items:											
Balances with Central Banks	862,657										862,657
Due from banks	3,406,563										3,406,563
Loans and advances to customers	2,081,780	4,767,421	2,421,542	3,330,584	58,740	563,182	1,855,907	1,673,016	1,512,720	24,266,751	42,531,643
Derivative financial assets	194,616	11,679	154,026	496	658,048	676	944	1,622	2,371	6	1,024,484
Trading securities	371				17,490						17,861
Securities measured at fair value through profit or loss	179,878										179,878
Securities measured at fair value through other comprehensive income	895,449	170,460	10,912	66,229	4,963,355				87,394		6,193,797
Securities measured at amortized cost					1,078,143						1,078,143
Assets held for sale – Loans Portfolio	1,814	438,581	283,549		692,943	18,296	3,394	80,563	186,447	64,380	1,769,967
Total amount of balance sheet items exposed to credit risk (a)	**7,623,128**	**5,388,141**	**2,870,029**	**3,397,309**	**7,468,718**	**582,154**	**1,860,245**	**1,755,201**	**1,788,932**	**24,331,137**	**57,064,992**
Other balance sheet items not exposed to credit risk	3,661,462	1,993	159,955					2,200	7,993,076	-	11,818,686
Total assets	**11,284,589**	**5,390,133**	**3,029,984**	**3,397,309**	**7,468,718**	**582,154**	**1,860,245**	**1,757,401**	**9,782,008**	**24,331,137**	**68,883,678**
Credit risk of exposures relating to off-balance sheet items:											
Letters of guarantee, letters of credit and other guarantees	913,743	536,168	1,008,636	525,264	193,193	87,304	7,242	59,269	270,195	65,237	3,666,251
Undrawn loan commitments	134,360	651,887	160,665	665,890	51	32,132	4,360	72,323	221,079	1,700,467	3,643,214
Guarantees provided for bonds issued by Bank's subsidiaries	15,542										15,542
Total amount of off-balance sheet items exposed to credit risk (b)	**1,063,645**	**1,188,055**	**1,169,301**	**1,191,154**	**193,244**	**119,436**	**11,602**	**131,592**	**491,274**	**1,765,704**	**7,325,007**
Total credit risk exposures (a+b)	**8,686,773**	**6,576,196**	**4,039,330**	**4,588,463**	**7,661,962**	**701,590**	**1,871,847**	**1,886,793**	**2,280,206**	**26,096,841**	**64,389,999**

535 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

EXPOSURE IN CREDIT RISK FROM DEBT ISSUED BY THE GREEK STATE

The table below presents the Bank's total exposure in Greek State debt:

	31.12.2020		31.12.2019	
Portfolio	**Nominal value**	**Carrying amount**	**Nominal value**	**Carrying amount**
Securities measured at fair value through other comprehensive income	2,024,315	2,286,989	2,940,147	3,524,379
Securities measured at amortized cost	2,118,842	2,779,179	921,600	1,070,730
Trading	21,762	29,154	14,657	17,490
Total	**4,164,919**	**5,095,322**	**3,876,404**	**4,612,599**

All Greek Government securities are classified in level 1 based on the quality of inputs used for the estimation of their fair value.

The Bank's exposure to Greek State from other, apart from securities, financial instruments is presented in the table below:

On balance sheet exposure

	31.12.2020	31.12.2019
	Carrying amount	
Derivative financial instruments-assets	860,878	658,048
Derivative financial instruments-liabilities	(11,965)	(32,045)

The Bank's exposure in loans to public sector entities / organizations on 31.12.2020 amounted to € 45,052 (31.12.2019: € 58,740). The Bank has recognized allowance for expected credit losses for the above mentioned loans, amounting to € 1,054 as at 31.12.2020 (31.12.2019: € 858). In addition, the balance of the Bank's loans guaranteed by the Greek State (guaranteed either directly by Greek Government or by Common Ministerial Decisions, loans guaranteed by ETEAN and loans guaranteed from the Hellenic Development Bank) on 31.12.2020 amounted to € 1,479,206 (31.12.2019: € 513,632). As at 31.12.2020, for these loans the Bank has recognized allowance for expected credit losses amounting to € 75,517 (31.12.2019: € 66,889). It is noted that the carrying amount of loans with guarantee by the COVID 19 Guarantee Fund of the Hellenic Development Bank amounted to € 997,261 as at 31.12.2020.

Off balance sheet exposure

	31.12.2020		31.12.2019	
	Nominal value	**Carrying amount**	**Nominal value**	**Carrying amount**
Greek Government Treasury Bills received as collateral for derivatives transactions	900,000	900,000	870,000	869,913

	31.12.2020		31.12.2019	
	Nominal value	**Carrying amount**	**Nominal value**	**Carrying amount**
Greek Government Bonds as collateral for funding purposes	335,407	402,695		

536 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

40.2 Market risk

Market risk is the risk of losses arising from unfavorable changes in the value or volatility of interest rates, foreign exchange rates, stock exchange indices, equity prices and commodities. Losses may also occur either from the trading portfolio or from the Assets-Liabilities management.

More specifically:

- Interest rate risk is the risk that results from adverse changes in the value or volatility of interest rates.
- Foreign exchange risk is the risk arising from adverse changes in the value or volatility of foreign exchange rates.
- Equity risk is the risk arising from adverse changes in the value or volatility of equities or equity indices. The Bank holds no material portfolio in such instruments.

i. Trading portfolio

The Bank's Market Risk Management Policy elaborates on how market risk is managed within the Bank, i.e. the identification, measurement, monitoring and control of market risk inherent in Treasury assets and liabilities transacted by the Bank and the country local Treasury Management Units, as well as the determination that adequate capital is held against this type of risk. The ultimate objective of the Policy is to provide the framework and principles for the effective management of market risk, in order to:

- maintain market risk within the limits, in line with the Bank's risk appetite;
- reduce the risk of fraud or regulatory non-compliance by prescribing sound methodologies;
- ensure adequate controls to prevent significant losses;
- facilitate efficient decision-making by quantifying where possible the probabilities of failing to achieve earnings or other targets.

All competent Bank units and country local Units apply the Policy by developing and applying corresponding processes.

Market risk of trading portfolio is measured by Value at Risk – VAR, that is the maximum amount of loss with a given probability (confidence level). The method applied for calculating Value at Risk is historical simulation with full revaluation using the 99th percentile and one tailed confidence interval. The historical observation period is one year at minimum. Risk factor returns are calculated according to the absolute or relative approach.

The Bank calculates VAR on a daily basis and the data sets are updated daily. A holding period of one and ten days is applied for regulatory purposes. Additional holding periods may be applied for internal purposes, according to the time required for the liquidation of the portfolio.

1 day value at risk, 99% confidence interval (2 years historical data)

(Amounts in Euro)

	2020				
	Foreign currency risk	Interest rate risk	Price risk	Covariance	Total
31 December	2,669,548	4,212,418	13,943	(2,243,487)	**4,652,422**
Average daily value (annual)	2,334,525	4,294,868	21,693	(1,987,989)	**4,663,097**
Maximum* daily value (annual)	2,782,449	4,985,643		(2,130,660)	**5,637,432**
Minimum* daily value (annual)	1,786,471	3,317,572	38,585	(2,011,525)	**3,131,103**

	2019				
	Foreign currency risk	Interest rate risk	Price risk	Covariance	Total
31 December	1,762,634	3,153,803	34,238	(1,816,901)	**3,133,774**
Average daily value (annual)	1,543,660	2,249,484	24,079	(1,402,094)	**2,415,129**
Maximum* daily value (annual)	1,755,297	3,190,158	35,521	(1,754,281)	**3,226,695**
Minimum* daily value (annual)	1,022,390	1,962,745	7,477	(1,265.027)	**1,727,585**

* Relates to the total Value at Risk within the year

537 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The Value at Risk methodology is based on certain theoretical assumptions, which under extreme market conditions might not capture the maximum loss the Bank may suffer, The limitations of the methodology may be summarized as follows:

- VAR refers to the potential loss at a 99% confidence level, without considering any losses beyond that level
- Risk factor returns are assumed to follow the empirical distribution that was experienced during the historical observation period.

On a daily basis, a retrospective test of Value at Risk model is carried out, taking into account hypothetical and actual changes in the trading book's profit and loss. According to best practices, the model is validated by an independent unit at the Bank on an annual basis.

The Value at Risk methodology is complemented with scenario analysis and stress testing, in order to estimate the potential size of losses that could arise from the trading portfolio for hypothetical as well as historical extreme movements of market parameters (stress-testing).

Within the scope of market risk control, open position, maximum loss (stop loss) and value at risk limits have been set across trading positions.

In particular, limits have been set for the following risks:

- Foreign currency risk regarding spot and forward positions and FX options
- Interest rate risk regarding positions in bonds, Interest Rate Swaps, Interest Futures, Interest Options
- Price risk regarding positions in shares, index Futures and options, Commodity Futures and Swaps
- Credit risk regarding interbank transactions and bonds

Positions held in these products are monitored on a daily basis and are examined for the corresponding limit percentage cover and for any limit excess.

ii. The financial risks of the banking portfolio

The Market risk may derive, apart from the trading portfolio, from the structure of assets and liabilities and from the portfolio of loans and deposits of the Bank. This risk is a foreign exchange and interest rate risk.

a. Foreign currency risk

The Bank takes on the risk arising from the fluctuations in foreign exchange rates.

The management of foreign currency position is centralized.

The policy of the Bank is the positions to be closed immediately using spot transactions or currency derivatives. In case that positions remain open, they are daily monitored in the context of the financial risk management policy and they are subject to limits.

The total open position arises from the net balance sheet position and derivatives forward position as presented in the following tables:

	31.12.2020								
	USD	GBP	CHF	JPY	RON	RSD	Other FC	Euro	Total
ASSETS									
Cash and Balances with Central Banks	2,579	3,789	360	44			676	6,674,784	6,682,232
Due from Banks	120,855	19,962	7,866	3,945	1,041	68	11,423	2,465,030	2,630,190
Trading securities								29,418	29,418
Derivative financial assets								1,272,924	1,272,924
Loans and advances to customers	1,899,937	53,244	668,268	7,651				32,651,707	35,280,807
Investment securities:									
- Measured at fair value through other comprehensive income	3,546							5,167,033	5,170,579
- Measured at fair value through profit or loss	28,325							189,992	218,317
- Measured at amortized cost								3,160,121	3,160,121
Investments in subsidiaries, associates and joint ventures		56,868			4,921			2,426,830	2,488,619
Investment property								46,659	46,659
Property, plant and equipment								642,381	642,381
Goodwill and other intangible assets								473,458	473,458
Deferred tax assets								5,277,158	5,277,158
Other assets and assets held for sale	8,454	16	35				3,712	1,635,670	1,647,887
Total Assets	**2,063,696**	**133,879**	**676,529**	**11,640**	**5,962**	**68**	**15,811**	**62,113,165**	**65,020,750**
LIABILITIES									
Due to banks and customers	1,937,093	102,085	69,925	983	17,174		189,567	50,552,058	52,868,885
Derivative financial liabilities								1,769,222	1,769,222
Debt securities in issue and other borrowed funds								1,048,536	1,048,536
Liabilities for current income tax and other taxes								64,296	64,296
Employee defined benefit obligations								84,899	84,899
Other liabilities	3,212	3,818	359	579			689	981,872	990,529
Provisions	1,543	18	3		658		112	187,165	189,499
Total liabilities	**1,941,848**	**105,921**	**70,287**	**1,562**	**17,832**	**-**	**190,368**	**54,688,048**	**57,015,866**
Net balance sheet position	121,848	27,958	606,242	10,078	(11,870)	68	(174,557)	7,425,117	8,004,884
Derivatives forward foreign exchange position	(81,348)	(6,411)	(279,512)	(9,542)	(470,965)		182,475	651,910	(13,393)
Total foreign exchange position	**40,500**	**21,547**	**326,730**	**536**	**(482,835)**	**68**	**7,918**	**8,077,027**	**7,991,491**

539 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*								
	USD	GBP	CHF	JPY	RON	RSD	Other FC	Euro	Total
ASSETS									
Cash and Balances with Central Banks	2,968	2,139	440	125			912	1,195,223	1,201,807
Due from Banks	115,901	15,648	13,895	10,684	1,373	72	17,307	3,158,058	3,332,938
Trading securities	370							18,277	18,647
Derivative financial assets								1,024,484	1,024,484
Loans and advances to customers	1,928,784	50,564	671,784	2,687			(5)	32,200,988	34,854,802
Investment securities:									-
- Measured at fair value through other comprehensive income	3,462							6,190,553	6,194,015
- Measured at fair value through profit or loss	13,013							204,499	217,512
- Measured at amortized cost								1,070,730	1,070,730
Investments in subsidiaries, associates and joint ventures		60,092			5,009			854,656	919,757
Investment property								39,679	39,679
Property, plant and equipment								697,459	697,459
Goodwill and other intangible assets								448,165	448,165
Deferred tax assets								5,233,082	5,233,082
Other assets and assets held for sale	9,115	16	2		155,671		3,763	2,559,548	2,728,115
Total Assets	**2,073,613**	**128,459**	**686,121**	**13,496**	**162,053**	**72**	**21,977**	**54,895,401**	**57,981,192**
LIABILITIES									
Due to banks and customers	2,006,784	111,611	85,607	1,900	17,338		192,115	43,880,606	46,295,961
Derivative financial liabilities								1,447,703	1,447,703
Debt securities in issue and other borrowed funds	133,132							749,434	882,566
Liabilities for current income tax and other taxes								24,887	24,887
Employee defined benefit obligations								87,395	87,395
Other liabilities	3,117	2,143	440	681			929	927,249	934,559
Provisions	1,007	3	2		601		28	199,105	200,746
Total liabilities	**2,144,040**	**113,757**	**86,049**	**2,581**	**17,939**	**-**	**193,072**	**47,316,379**	**49,873,817**
Net balance sheet position	(70,427)	14,702	600,072	10,915	144,114	72	(171,095)	7,579,022	8,107,375
Derivatives forward foreign exchange position	85,850	(16,885)	(373,340)	(11,019)	(484,033)		179,362	615,617	(4,448)
Total foreign exchange position	**15,423**	**(2,183)**	**226,732**	**(104)**	**(339,919)**	**72**	**8,267**	**8,194,639**	**8,102,927**

* Certain figures of the previous year have been restated as described in note 47.

540 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The open foreign exchange position as at 31.12.2020 presents the following sensitivity analysis:

Currency	Exchange rate variation scenario against Euro (%))	Impact on net income before tax
USD	Appreciation USD 5%	2,132
	Depreciation USD 5%	(1,929)
GBP	Appreciation GBP 5%	1,134
	Depreciation GBP 5%	(1,026)
CHF	Appreciation CHF 5%	17,196
	Depreciation CHF 5%	(15,559)
RON	Appreciation RON 5%	(25,412)
	Depreciation RON 5%	22,992
ALL	Appreciation ALL 5%	196
	Depreciation ALL 5%	(178)

b. Interest Rate Risk

Banking book interest rate risk relates to the volatility on Equity and interest income of the Bank due to the mismatch between the non-negotiable Assets-Liabilities and the measured at fair value through other comprehensive income portfolio. The interest rate risk management framework is determined in accordance with the Asset Liability Risk Management Policy. Based on this framework, the risk analysis of the Banking Portfolio is analyzed through the Interest Rate Gap Analysis. Particularly, assets and liabilities are classified in Gaps depending on their reprising date for floating-rate items, or maturity date for fixed rate items.

For those assets and liabilities with no maturity date, the distribution of flows is based on models of their behavior analysis. These models have been validated by the competent independent Division of the Bank. Interest rate risk management is carried out by ALCO, following proposals by Group Market and Operational Risk Division, Financial Markets Division and Asset Liability Management Division. Stress interest rate scenarios are carried out on a monthly basis and their impact on the interest income change through EAR (Earnings at Risk) and Equity Value through EVE (Economic Value of Equity) is calculated. Corresponding limits have been set for both measures (EaR & EVE) which are monitored and presented to ALCO and RMC on a regular basis.

541 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following table presents the Interest Rate Repricing Analysis of both Assets and Liabilities, financial and non financial.

	31.12.2020							
	Less than 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	> 5 years	Non-interest bearing	Total
ASSETS								
Cash and balances with Central Banks	6,421,222						261,010	6,682,232
Due from Banks	1,927,600	298,222	206,666		270	197,432		2,630,190
Trading securities					2,003	27,415		29,418
Derivative financial assets	1,272,924							1,272,924
Loans and advances to customers	11,300,262	7,417,610	2,903,942	1,349,722	8,244,706	4,064,565		35,280,807
Investment securities:								
- Measured at fair value through other comprehensive income	419,473	288,703	522,259	323,979	1,910,935	1,705,230		5,170,579
- Measured at fair value through profit and loss	202,741	13,412				2,164		218,317
- Measured at amortized cost				89,241	489,363	2,581,517		3,160,121
Investments in subsidiaries, associates and joint ventures							2,488,619	2,488,619
Investment properties							46,659	46,659
Property, plant and equipment							642,381	642,381
Goodwill and other intangible assets							473,458	473,458
Deferred tax assets							5,277,158	5,277,158
Other Assets							1,373,114	1,373,114
Assets held for sale							274,773	274,773
Total Assets	**21,544,222**	**8,017,947**	**3,632,867**	**1,762,942**	**10,647,277**	**8,578,323**	**10,837,172**	**65,020,750**
LIABILITIES								
Due to banks	623,762	342,715	384,391	109,751	11,873,180			13,333,799
Derivative financial liabilities	1,769,222							1,769,222
Due to customers	9,273,744	5,478,015	3,337,877	3,867,884	11,701,657	5,875,909		39,535,086
Debt securities in issue and other borrowed funds	651	15,300	1,552		1,031,033			1,048,536
Liabilities for current income tax and other taxes							64,296	64,296
Employee defined benefit obligations							84,899	84,899
Other Liabilities							990,529	990,529
Provisions							189,499	189,499
Total Liabilities	**11,667,379**	**5,836,030**	**3,723,820**	**3,977,635**	**24,605,870**	**5,875,909**	**1,329,223**	**57,015,866**
EQUITY								
Share capital							463,110	463,110
Share premium							10,801,029	10,801,029
Reserves							326,893	326,893
Retained earnings							(3,586,148)	(3,586,148)
Total Equity	**-**	**-**	**-**	**-**	**-**	**-**	**8,004,884**	**8,004,884**
Total Liabilities and Equity	**11,667,379**	**5,836,030**	**3,723,820**	**3,977,635**	**24,605,870**	**5,875,909**	**9,334,107**	**65,020,750**
Open Exposure	**9,876,843**	**2,181,917**	**(90,953)**	**(2,214,693)**	**(13,958,593)**	**2,702,414**	**1,503,065**	
Cumulative Exposure	**9,876,843**	**12,058,760**	**11,967,807**	**9,753,114**	**(4,205,479)**	**(1,503,065)**		

542 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*							
	Less than 1 month	1 to 3 months	3 to 6 months	6 to 12 months	1 to 5 years	> 5 years	Non-interest bearing	Total
ASSETS								
Cash and balances with Central Banks	862,656						339,151	1,201,807
Due from Banks	1,626,710	1,511,778			288	194,162		3,332,938
Trading securities			387		7,331	10,929		18,647
Derivative financial assets	1,024,484							1,024,484
Loans and advances to customers	12,073,535	6,494,242	2,428,771	1,439,553	8,092,866	4,325,835		34,854,802
Investment securities:								
- Measured at fair value through other comprehensive income	236,336	77,048	176,380	340,696	2,913,118	2,450,437		6,194,015
- Measured at fair value through profit and loss	205,516	10,134				1,862		217,512
- Measured at amortized cost					88,104	982,626		1,070,730
Investments in subsidiaries, associates and joint ventures							919,757	919,757
Investment properties							39,679	39,679
Property, plant and equipment							697,459	697,459
Goodwill and other intangible assets							448,165	448,165
Deferred tax assets							5,233,082	5,233,082
Other Assets							1,356,278	1,356,278
Assets held for sale		409,118		47,626			915,093	1,371,837
Total Assets	**16,029,237**	**8,502,320**	**2,605,538**	**1,827,875**	**11,101,707**	**7,965,851**	**9,948,664**	**57,981,192**
LIABILITIES								
Due to banks	4,863,107	772,997	1,011,384	2,511,488	1,595,519			10,754,495
Derivative financial liabilities	1,447,703							1,447,703
Due to customers	10,081,146	4,056,413	3,716,405	3,515,332	9,289,708	4,882,462		35,541,466
Debt securities in issue and other borrowed funds	156,236	528,273	198,057					882,566
Liabilities for current income tax and other taxes							24,887	24,887
Employee defined benefit obligations							87,395	87,395
Other Liabilities							934,559	934,559
Provisions							200,746	200,746
Total Liabilities	**16,548,192**	**5,357,683**	**4,925,846**	**6,026,820**	**10,885,227**	**4,882,462**	**1,247,587**	**49,873,817**
EQUITY								
Share capital							463,110	463,110
Share premium							10,801,029	10,801,029
Reserves							568,438	568,438
Retained earnings							(3,725,202)	(3,725,202)
Total Equity	**-**	**-**	**-**	**-**	**-**	**-**	**8,107,375**	**8,107,375**
Total Liabilities and Equity	**16,548,192**	**5,357,683**	**4,925,846**	**6,026,820**	**10,885,227**	**4,882,462**	**9,354,962**	**57,981,192**
Open Exposure	**(518,955)**	**3,144,637**	**(2,320,308)**	**(4,198,945)**	**216,480**	**3,083,389**	**593,702**	
Cumulative Exposure	**(518,955)**	**2,625,682**	**305,374**	**(3,893,571)**	**(3,677,091)**	**(593,702)**		

* Certain figures of the previous year have been restated as described in note 47.

543 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

From the Interest Rate Gap Analysis and from the application of alternative scenarios regarding the changes in the market interest rates or the changes in the base interest rates of the Bank, the immediate change in the net interest income and equity relating to securities measured at fair value through other comprehensive income is directly calculated and the respective hedging instruments. In the Interest Rate Gap Analysis, the variance, up to the point it's feasible (interest rate equals to zero), is studied, according to the interest rate curves by currency in force.

Interest rate variation scenario (parallel fall or rise in yield curves)	Sensitivity for net interest income (annual)	Sensitivity of Equity
-200	(67,636)	462,616
+200	(12,357)	(385,965)

40.3 Liquidity Risk

Liquidity risk relates to the Bank's ability to maintain sufficient funds to cover its planned or extraordinary obligations. Liquidity Risk comprises both funding liquidity risk and asset liquidity risk though these two dimensions of liquidity risk are closely related. Funding Liquidity risk refers to the inability of a financial institution to raise the cash necessary to rollover its debt, fulfill the cash, margin, or collateral requirements of counterparties; or to meet capital withdrawals. Asset – market liquidity risk, results from the Bank's failure to recognize or address changes in market conditions that affect the ability to liquidate assets quickly and with minimal loss in value. For those assets and liabilities with no maturity date, the distribution of flows is based on models of their behavior analysis. These models have been validated by the competent independent Division of the Bank.

According to Bank's Liquidity Risk Management Policy, the Board Risk Management Committee assigns the overall responsibility for overseeing asset and liability management to Asset – Liability Committee (ALCo). ALCo is responsible on one hand to monitor the quantitative and qualitative aspects of liquidity risk and on the other hand to ensure that appropriate policies and procedures are in place to control and limit liquidity risk. In addition to that, ALCo is responsible for approving the guidelines, principles, risk measurement techniques and limits that have been proposed by the Market and Operational Risk Division, Financial Markets Division and Asset Liability Management Division.

Bank's executive and senior management is informed on current liquidity risk exposures on a daily basis, ensuring that the Bank's liquidity risk profile stays within approved limits. Moreover, management receives on a daily basis a liquidity report, which presents a detailed analysis of Bank's funding sources and counterbalancing capacity. Among others, for the purpose of proper management of liquidity risk and in line with supervisory requirements, the Bank monitors and manages on a monthly basis, the amount, quality and concentration of counterbalancing capacity, the cash flows arising from assets and liabilities (inflows, outflows – maturity ladder) over time, the concentration and cost of funding, the roll over of funding.

The Bank calculates the Liquidity Coverage Ratio* and Net Stable Funding Ratio on a monthly and quarterly basis respectively as defined by Regulation (EU) 575/2013. Both ratios (LCR and NSFR) exceeded the minimum acceptable supervisory threshold (100%) with Liquidity Coverage Ratio reaching 135%. This is attributed to the increase in customer deposits, improved access to interbank markets, the issuance of Tier 2 bonds in February 2020 as well as the increase in long-term lending through the Eurosystem (TLTRO-III).

The following list summarizes the main reports which are produced on a periodic basis in order to inform the Group's executive and senior management and the ALCo; Static Liquidity Gap analysis, regulatory liquidity ratios of the Group and the subsidiaries, deposit concentration report per subsidiary per currency, Group's Loans to Deposit ratio, liquidity risk indicators and triggers as defined in Recovery Plan of each subsidiary and the Group, liquidity stress testing according to scenarios that evaluate the impact of systemic and idiosyncratic stress events on each subsidiary's liquidity position.

Stress tests are carried out on a monthly basis and/ or more frequently, for liquidity purposes, in order to assess potential outflows (contractual or contingent) to determine the level of immediate liquidity available to cover the Bank's needs. These tests are carried out according to the approved, Liquidity Buffer and Liquidity Stress Scenario Policy of the Group and evaluate the risk in idiosyncratic extraordinary events (idiosyncratic stress test) in the Bank's liquidity, in systemic (systemic stress test) as well as combined events (combined stress test), while it has to be noted that stress tests are also used in order to determine the Liquidity buffer for recovery purposes. According to the policy and within the context of ILAAP, the Bank also applies a reverse stress test in order to examine its impact on its liquidity.

* Liquidity Coverage Ratio will be published under Pillar III.

544 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Taking into account that liquidity risk management seeks to ensure that the respective risk of the Bank is measured properly and is maintained within acceptable levels, even under adverse conditions, then the Bank must have access to funds in order to cover customer needs, maturing liabilities and other capital needs, while maintaining at the same time the appropriate counterbalancing capacity to ensure the above.

More analytically, the total funding can be divided into two main categories:

A. Customer Deposits

1. Customer deposits on demand for cash flow needs

Deposits that are intended to meet short term needs of customers are the savings accounts and the sight deposits. Although these deposits may be withdrawn on demand, the number of accounts and type of depositors ensure that unexpected significant fluctuations are limited. Therefore, these deposits constitute a significant factor of stability of the deposit base.

2. Customer term deposits and bonds for investment purposes

The customer term deposits and bonds for investment purposes issued by the Group companies usually consist of customer deposits for a certain period and customer repurchase agreements (repos), whereas the bonds issued by the Group companies are disposed through outright sale. Customers have the ability of early withdrawal of deposits or early liquidation of bonds which may result in potential need of finding alternative liquidity in case of extensive outflows.

For this purpose and for the general safety of customer deposits, the Bank takes care for the existence of adequate liquidity surpluses which are calculated based on stress testing exercises due to loss of liquidity or the existence of sufficient credit lines of financial instruments as shown below.

B. Wholesale funding

1. Medium-term borrowing from international capital markets

The Bank's constant aspiration is to cooperate with international investors who may offer medium term financing through purchase of securities issued by the Group companies. For this purpose, the Bank retains special financing programs appealing to international investors and provides adequate coverage of credit needs through international capital markets by planning asset level needs on an annual basis. However, the Bank acknowledges that the demand of these bonds may not be enough to fully meet the needs in specific time intervals as a result of factors which concern the credit assessment in the domestic and international economic environment.

2. Funding by Central Banks

An alternative way of Bank funding is the liquidity from financial instruments of the Central Banks- Euro system and especially from the European Central Bank (ECB). This funding regards loan granted with pledge of assets according to instructions and the eligible assets determined by the ECB. During the last years this additional source funding has become a major financial instrument by hedging the inadequate or loss of basic forms of Bank funding. Furthermore, the Bank can use available assets in order to increase liquidity from the Euro system to cover any financing gap. The Bank recognizes the short-term nature of this liquidity source and pursues gradually to release, if circumstances allow. However, for as long as the country is experiencing financial and economic crisis, the Bank ensures the smooth financing from these financial instruments which may be either conventional marginal lending from the ECB (MRO), or Emergent Liquidity Assistance from Bank of Greece (ELA). The Bank ensures the adequacy of collateral required in order to serve the financing from the above financial instruments, while recognizing both the type and the amount of financing that is under the discretion of the Euro system.

Eurosystem funding increased by € 8,8 billion since 31.12.2019, amounting to € 11,9 billion on 31.12.2020, coming exclusively from the Targeted longer-term refinancing operations (TLTRO-III). Through the financing of this program, the Bank managed to extend the time horizon of its financing into long-term loans as well as to improve the pricing conditions in relation to the repurchase agreements, which in 2020 decreased by 5,84 billions. The financing from the Emergency Liquidity Assistance (ELA) of the Bank of Greece has been completely eliminated since February 2019.

According to the Liquidity Gap Analysis, the cash flows arising from balance sheet items are calculated and classified into time periods in accordance with the contractual maturity date or an estimated date based on a statistical analysis (convention). An exception to the above, are the securities portfolios, which can contribute directly to raise liquidity, and they are allocated in the first period under the condition they have not been used to raise liquidity either by the Central Bank or through interbank repos.

	31.12.2020					
	< 1 month	1 to 3 months	3 to 6 months	6 to 12 months	> 1 year	Total
ASSETS						
Cash and balances with central banks	6,682,232					6,682,232
Due from banks	1,848,931	293	213,208	181,050	386,708	2,630,190
Trading securities	29,418					29,418
Derivative financial assets	1,272,924					1,272,924
Loans and advances to customers	856,362	973,580	1,334,957	2,953,687	29,162,221	35,280,807
Investment securities:						
- Measured at fair value through other comprehensive income	5,170,579					5,170,579
- Measured at fair value through profit or loss	218,317					218,317
- Measured at amortized cost				73,108	3,087,013	3,160,121
Investments in subsidiaries, associates and joint ventures					2,488,619	2,488,619
Investment properties					46,659	46,659
Property, plant and equipment					642,381	642,381
Goodwill and other intangible assets					473,458	473,458
Deferred tax assets		607,466		3,336,445	1,333,247	5,277,158
Other Assets					1,373,114	1,373,114
Assets held for sale	66,938	21,782	143,318	42,735		274,773
Total Assets	**16,145,701**	**1,603,121**	**1,691,483**	**6,587,025**	**38,993,420**	**65,020,750**
LIABILITIES						
Due to banks	424,238	30,095	378,804	111,090	12,389,572	13,333,799
Derivative financial liabilities	1,769,222					1,769,222
Due to customers	6,917,176	5,592,779	3,510,024	4,212,178	19,302,929	39,535,086
Debt securities in issue and other borrowed funds					1,048,536	1,048,536
Liabilities for current income tax and other taxes		7,836	50,560	5,900		64,296
Employee defined benefit obligations					84,899	84,899
Other Liabilities	2,469	4,426	6,452	12,542	964,640	990,529
Provisions					189,499	189,499
Total Liabilities	**9,113,105**	**5,635,136**	**3,945,840**	**4,341,710**	**33,980,075**	**57,015,866**
EQUITY						
Share capital					463,110	463,110
Share premium					10,801,029	10,801,029
Reserves					326,893	326,893
Retained earnings					(3,586,148)	(3,586,148)
Total Equity	**-**	**-**	**-**	**-**	**8,004,884**	**8,004,884**
Total Liabilities and Equity	**9,113,105**	**5,635,136**	**3,945,840**	**4,341,710**	**41,984,959**	**65,020,750**
OPEN LIQUIDITY GAP	**7,032,596**	**(4,032,015)**	**(2,254,357)**	**2,245,315**	**(2,991,539)**	
CUMULATIVE LIQUIDITY GAP	**7,032,596**	**3,000,581**	**746,224**	**2,991,539**		

The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019*					
	< 1 month	1 to 3 months	3 to 6 months	6 to 12 months	> 1 year	Total
ASSETS						
Cash and balances with central banks	1,201,807					1,201,807
Due from banks	1,511,225	1,179,475	450	36,729	605,059	3,332,938
Trading securities	18,647					18,647
Derivative financial assets	1,024,484					1,024,484
Loans and advances to customers	1,132,520	1,535,958	1,175,006	2,581,587	28,429,731	34,854,802
Investment securities:						
- Measured at fair value through other comprehensive income	6,194,015					6,194,015
- Measured at fair value through profit or loss	217,512					217,512
- Measured at amortized cost					1,070,730	1,070,730
Investments in subsidiaries, associates and joint ventures					919,757	919,757
Investment properties					39,679	39,679
Property, plant and equipment					697,459	697,459
Goodwill and other intangible assets					448,165	448,165
Deferred tax assets		654,538		1,744,915	2,833,629	5,233,082
Other Assets					1,356,278	1,356,278
Assets held for sale		409,118	868,876	93,843		1,371,837
Total Assets	**11,300,210**	**3,779,089**	**2,044,332**	**4,457,074**	**36,400,487**	**57,981,192**
LIABILITIES						
Due to banks	4,663,714	493,278	999,150	2,512,389	2,085,964	10,754,495
Derivative financial liabilities	1,447,703					1,447,703
Due to customers	8,391,664	4,132,914	3,831,156	3,744,833	15,440,899	35,541,466
Debt securities in issue and other borrowed funds					882,566	882,566
Liabilities for current income tax and other taxes		15,179	3,208	6,500		24,887
Employee defined benefit obligations					87,395	87,395
Other Liabilities	1,361	4,390	6,570	12,454	909,784	934,559
Provisions					200,746	200,746
Total Liabilities	**14,504,442**	**4,645,761**	**4,840,084**	**6,276,176**	**19,607,354**	**49,873,817**
EQUITY						
Share capital					463,110	463,110
Share premium					10,801,029	10,801,029
Reserves					568,438	568,438
Retained earnings					(3,725,202)	(3,725,202)
Total Equity	-	-	-	-	**8,107,375**	**8,107,375**
Total Liabilities and Equity	**14,504,442**	**4,645,761**	**4,840,084**	**6,276,176**	**27,714,729**	**57,981,192**
OPEN LIQUIDITY GAP	**(3,204,232)**	**(866,672)**	**(2,795,752)**	**(1,819,102)**	**8,685,758**	
CUMULATIVE LIQUIDITY GAP	**(3,204,232)**	**(4,070,904)**	**(6,866,656)**	**(8,685,758)**		

* Certain figures of the previous year have been restated as described in note 47.

547 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Trading and investment portfolios measured at fair value through profit or loss and through other comprehensive income are listed based on their liquidation potential and not according to their maturity.

Cash flows arising from financial liabilities including derivative financial liabilities, are allocated into time bands according to their maturity date. Estimated interest payments are also included. Liabilities in foreign currency have been converted into Euro. Outflows and inflows relating to derivatives are estimated according to their contractual terms.

	31.12.2020						
	Total Balance Sheet	Nominal inflows / (outflows)					Total
		Less than one month	1 to 3 months	3 to 6 months	6 to 12 months	More than a year	
Non-derivative liabilities							
Due to banks	13,333,799	(419,215)	(20,189)	(364,202)	(82,193)	(12,336,612)	(13,222,411)
Due to customers	39,535,086	(6,919,802)	(5,597,386)	(3,516,507)	(4,224,294)	(19,351,600)	(39,609,589)
Debt securities in issue and other borrowed funds	1,048,536	(2,834)	(5,559)	(8,413)	(16,870)	(1,115,820)	(1,149,496)
Other liabilities	990,529	(2,697)	(4,817)	(7,015)	(13,587)	(971,717)	(999,833)
Derivatives held for assets fair value hedge	11,861						
- Outflows			(323)	(3,097)	(3,536)	(32,360)	(39,316)
- Inflows					1,820	36,959	38,779
Derivatives held for trading	1,757,361						
- Outflows		(279,437)	(516,845)	(249,923)	(131,000)	(1,776,742)	(2,953,947)
- Inflows		266,697	457,516	190,436	121,819	1,298,600	2,335,068
Total	**56,677,172**	**(7,357,288)**	**(5,687,603)**	**(3,958,721)**	**(4,347,841)**	**(34,249,292)**	**(55,600,745)**
Off Balance sheet items							
Undrawn loan commitments							-
Financial guarantees		(111,150)	(65,694)	(132,915)	(240,017)	(2,060,850)	(2,610,626)
Total off Balance sheet items	**-**	**(111,150)**	**(65,694)**	**(132,915)**	**(240,017)**	**(2,060,850)**	**(2,610,626)**

	31.12.2019*						
	Total Balance Sheet	Nominal inflows / (outflows)					Total
		Less than one month	1 to 3 months	3 to 6 months	6 to 12 months	More than a year	
Non-derivative liabilities							
Due to banks	10,754,495	(4,664,249)	(493,788)	(1,000,322)	(2,518,692)	(2,110,647)	(10,787,698)
Due to customers	35,541,466	(8,399,411)	(4,146,819)	(3,849,505)	(3,777,738)	(15,564,467)	(35,737,940)
Debt securities in issue and other borrowed funds	882,566	(1,079)	(3,038)	(4,546)	(9,071)	(917,888)	(935,622)
Other liabilities	934,559	(2,593)	(5,154)	(7,446)	(14,120)	(925,633)	(954,946)
Derivatives held for assets fair value hedge	323,403						
- Outflows		(150)	(52,590)	(80,717)		(340,510)	(473,967)
- Inflows			51,710	64,626	10,282	326,232	452,850
Derivatives held for trading	1,124,300						-
- Outflows		(307,797)	(294,948)	(177,258)	(95,018)	(1,154,583)	(2,029,604)
- Inflows		289,847	248,830	139,052	88,360	1,060,422	1,826,511
Total	**49,560,789**	**(13,085,432)**	**(4,695,797)**	**(4,916,116)**	**(6,315,997)**	**(19,627,074)**	**(48,640,416)**
Off Balance sheet items							
Undrawn loan commitments							-
Financial guarantees		(13,998)	(865)	(3,304)	(54,954)	(2,540,976)	(2,614,097)
Total off Balance sheet items	**-**	**(13,998)**	**(865)**	**(3,304)**	**(54,954)**	**(2,540,976)**	**(2,614,097)**

* Certain figures of the previous year have been restated for comparability purposes.

548 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

40.4 Fair value of financial assets and liabilities

Hierarchy of financial instruments that are not measured at fair value

	31.12.2020				
	Level 1	Level 2	Level 3	Total fair value	Total Carrying amount
Financial Assets					
Loans and advances to customers			34,681,276	34,681,276	34,976,739
Investment securities					
- Measured at amortized cost	1,571,354	1,677,492		3,248,846	3,160,121
Financial liabilities					
Due to customers			39,529,151	39,529,151	39,535,086
Debt securities in issue and other borrowed funds	531,105	486,925	9,887	1,027,917	1,048,536

	31.12.2019				
	Level 1	Level 2	Level 3	Total fair value	Total Carrying amount
Financial Assets					
Loans and advances to customers			34,220,570	34,220,570	34,538,870
Investment securities					
- Measured at amortized cost	1,084,602			1,084,602	1,070,730
Financial liabilities					
Due to customers			35,527,768	35,527,768	35,541,466
Debt securities in issue and other borrowed funds	541,546	1,662	322,380	865,589	882,566

The above tables set out the fair values and carrying amounts of those financial assets that are not measured at fair value classified by fair value hierarchy.

The fair value of loans measured at amortised cost is estimated using the discounting cash flows models for the discounting of the contractual cash flows to maturity. The components of the discount rate are the interbank market yield curve, the liquidity premium and the expected loss rate. For the loans that for credit risk purposes are classified as impaired and are individually assessed for impairment, the model uses the expected future cash flows excluding expected credit losses. For the fair valuation of the impaired loans which are collectively assessed for impairment, estimates are made for principal repayment after taking into account the allowance for expected credit losses.

The interbank market yield curve and the liquidity premium serve as the discount rate for the impaired loans.

The fair value of deposits is estimated based on the interbank market yield curve and the liquidity premium until their maturity.

Level 1 includes securities and debt securities in issue that are traded in active markets.

Level 2 includes securities and debt securities in issue, the fair value of which, is determined based on non-binding market prices provided by dealers-brokers or through the use of discounted cash flow methodologies such (income approach) using interest rates and credit spreads which are observable in the market.

Level 3 of the caption “Debt securities in issue and other borrowed funds” includes the Bank’s liabilities to the Special Purpose Entities, related to securitized loans which are related to bond issues owned by the Bank. The fair value of these liabilities was calculated by discounting future cash flows taking into account non-observable market data.

The fair value of the remaining financial assets and liabilities which are measured at amortised cost and include mainly due from banks and central banks as well as due to banks, does not differ materially from their respective carrying amount.

549 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Fair value hierarchy - financial assets and liabilities measured at fair value

	31.12.2020			
	Level 1	Level 2	Level 3	Fair Value
Derivative financial assets	2,420	1,270,504		1,272,924
Trading securities				
- Bonds and Treasury bills	29,154			29,154
- Shares	264			264
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury bills	4,868,589	280,511	1,018	5,150,118
- Shares	13,031		7,430	20,461
Securities measured at fair value through profit or loss				
- Bonds and Treasury bills			168,883	168,883
- Other variable yield securities	5,757	16,340		22,097
- Shares		18,360	8,977	27,337
Loans measured at fair value through profit or loss			264,068	264,068
Other receivables measured at fair value through profit or loss			40,000	40,000
Derivative financial assets		1,769,222		1,769,222

	31.12.2019*			
	Level 1	Level 2	Level 3	Fair Value
Derivative financial assets	2,288	1,021,216	980	1,024,484
Trading securities				
- Bonds and Treasury bills	17,490	371		17,861
- Shares	786			786
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury bills	5,899,557	258,952	10,532	6,169,041
- Shares	9,529		15,446	24,975
Securities measured at fair value through profit or loss				
- Bonds and Treasury bills			179,878	179,878
- Other variable yield securities	7,261	30,364		37,625
- Shares			9	9
Loans measured at fair value through profit or loss			315,932	315,932
Derivative financial liabilities		1,447,703		1,447,703

The above tables present the fair value of the financial instruments measured at fair value by the level of the fair value hierarchy into which the fair value measurement is categorized.

Level 1 includes securities which are traded in an active market and exchange-traded derivatives.

Level 2 includes securities whose fair value is calculated based on non-binding market prices provided by dealers-brokers or securities whose fair value is estimated based the income approach methodology with the use of interest rates and credit spreads which are observable in the market.

Level 3 includes securities whose fair value is estimated using significant unobservable inputs.

Relating to impact of Covid-19, it is noted that the Bank, following the relevant measures taken by the Central Banks and the member states as well as the consequent normalization of the financial markets and capital markets, did not consider that it was appropriate to change in the methodology for calculating fair values of securities and derivatives as at 31.12.2020.

* Certain figures of the previous year have been restated for comparability purposes as described in note 47.

550 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The valuation methodology of securities is subject to approval by the Treasury and Balance Sheet Management / Assets Liabilities Management Committees. It should be noted that specifically for securities whose fair value is calculated based on market prices, bid prices are considered and daily checks are performed with regards to their change in fair value.

The fair value of loans measured at fair value through profit or loss, is estimated based on the valuation methodology as described above regarding the disclosure of fair value estimation for loans measured at amortized cost.

Shares whose fair value is estimated are classified to Level 2 or Level 3, depending on the extent of the contribution of unobservable data to the calculation of the final fair value. The fair value of non-listed shares, as well as shares not traded in an active market is determined either based on the Bank's share on the issuer's equity or by the multiples valuation method or the estimations made by the Bank regarding the future profitability of the issuer taking into account the expected growth rate of its operations, as well as the weighted average rate of capital return which is used as discount rate.

For the valuation of over the counter derivatives income approach methodologies are used: discounted cash flow models, option-pricing models or other widely accepted financial valuation models.

The valuation methodology of the over the counter derivatives is subject to approval by the Treasury and Balance Sheet Management / Assets Liabilities Management Committees. Mid prices are considered as both long and short positions may be open. Valuations are checked on a daily basis with the respective prices of the counterparty banks in the context of the daily process of provision of collaterals and settlement of derivatives. If the non observable inputs are significant, the fair value that arises is classified as Level 3 or otherwise as Level 2. We note that on 27.7.2020 the reference rate in the discount rate of interest rate derivatives in euro (interest rate swaps) that are cleared centrally, changed from Euro overnight index average (EONIA) to Euro short term rate (€ STR). Due to the change in valuation methodology the fair value of the derivatives was changed and at the same time a compensation amounting to € 745 was collected and recognized in gains less losses on financial transactions, so that there is no transfer of value between the two parties. The change in the discount curve has no effect on the Bank's results.

In addition, the Bank calculates the credit valuation adjustment (CVA) in order to take into account the counterparty credit risk for the OTC derivatives. In particular, taking into consideration its own credit risk, the Bank calculates the bilateral credit valuation adjustment (Bilateral CVA/BCVA) for the OTC derivatives held on a counterparty level according to netting and collateral agreements in force. BCVA is calculated across all counterparties with a material effect on the respective derivative fair values taking into consideration the default probability of both the counterparty and Bank, the impact of the first to default, the expected OTC derivative exposure, the loss given default of the counterparty and of Bank and the specific characteristics of netting and collateral agreements in force.

Collaterals are simulated along with the derivative portfolio exposure over the life of the related instruments. Calculations performed depend largely on observable market data. Market quoted counterparty and Bank's CDS spreads are used in order to derive the respective probability of default, a market standard recovery rate is assumed for developed market counterparties, correlations between market data are taken into account and subsequently a series of simulations is performed to model the portfolio exposure over the life of the related instruments. In the absence of observable market data, the counterparty probability of default and loss given default are determined using the Bank's internal models for credit rating and collateral valuation. BCVA model is validated from an independent division of the Bank according to best practices.

A breakdown of BCVA per counterparty sector and credit quality, as defined for the presentation purposes of the table "Analysis of neither past due nor impaired Loans and Advances to customers" is given below:

	31.12.2020	31.12.2019
Category of counterparty		
Corporates	(3,809)	(1,319)
Governments	(20,745)	(11,963)

	31.12.2020	31.12.2019
Hierarchy of counterparty by credit quality		
Strong	(2,849)	(104)
Satisfactory	(21,705)	(12,300)
At default		(878)

551 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The table below presents the valuation methods used for the measurement of Level 3 fair value:

	31.12.2020			
	Total Fair Value	**Fair Value**	**Valuation Method**	**Significant Non-observable Inputs**
Bonds measured at fair value through other comprehensive income	1,018	1,018	Based on issuer price / Cash flow discount with an estimate of the bond yield	Issuer price
Shares measured at fair value through other comprehensive income	7,430	7,430	Discounted cash flows / Multiples valuation method	Future profitability of the issuer, expected growth / Valuation ratios Average weighted cost of capital
Bonds measured at fair value through profit or loss	168,883	168,883	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price – Credit risk margin-Assessment of reserve adequacy for payment of hybrid securities dividends
Shares measured at fair value through profit or loss	8,977	8,977	Discounted cash flows / Multiples valuation method / Expected transaction price	Future profitability of the issuer, expected growth / Valuation ratios
Loans measured at fair value through profit or loss	264,068	264,068	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk	Expected loss and cash flows from counterparty' credit risk
Other receivables measured at fair value through profit or loss	40,000	40,000	Discounted cash flows of the underlying receivables portfolio	Cash Flows from the management of the underlying receivables portfolio

	31.12.2019			
	Total Fair Value	**Fair Value**	**Valuation Method**	**Significant Non-observable Inputs**
Derivative financial assets (Interest rate caps, Interest rate swaps)	980	980	Discounted cash flows with interest rates being the underlying instruments, taking into account the credit risk of the counterparty	The probability of default and loss given default of the counterparty (BCVA adjustment) calculated using an internal model
		-	Discounted cash flow at underlying interest rates	Assessment of reserve adequacy for payment of hybrid securities dividends
Bonds measured at fair value through other comprehensive income	10,532	10,532	Based on issuer price / Cash flow discount with an estimate of the bond yield	Issuer price / Bond yield
Shares measured at fair value through other comprehensive income	15,446	15,446	Discounted cash flows / Multiples valuation method	Future profitability of the issuer, expected growth / Valuation ratios Average weighted cost of capital
Bonds measured at fair value through profit or loss	179,878	179,878	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price – Credit risk margin-Assessment of reserve adequacy for payment of hybrid securities dividends
Shares measured at fair value through profit or loss	9	9	Discounted cash flows / Multiples valuation method / Expected transaction price	Future profitability of the issuer, expected growth / Valuation ratios
Loans measured at fair value through profit or loss	315,932	315,932	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk	Expected loss and cash flows from counterparty' credit risk

The Bank recognizes the transfer between fair value hierarchy Levels at the end of each reporting period.

During the year, a Greek corporate bond was transferred from Level 1 to Level 2 of a total amount of € 29,730 as the liquidity margin (bid-ask spread) moved outside the limit set for the characterization of market as active.

Within the previous year, corporate bonds of Greek issuers were transferred from Level 2 to Level 1 of a total amount of € 969 as the liquidity margin (bid-ask spread) moved outside the limit set for the characterization of market as active.

552 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

A reconciliation for the movement of financial assets measured at fair value in Level 3 is depicted below:

	31.12.2020				
	Assets				
	Securities measured at fair value through other comprehensive income	Securities measured at fair value through profit or loss	Loans measured at fair value through profit or loss	Derivative financial assets	Other receivables measured at fair value through profit or loss
Opening Balance 1.1.2020	**25,978**	**179,887**	**315,932**	**980**	**-**
Total gain/(loss) recognized in Income Statement	909	(10,651)	(20,047)	27	
- Net interest income	270	571	11,539		
- Gains less losses on financial transactions	55	(11,222)	(31,586)	27	
- Impairment losses	584				
Total gain/(loss) recognized in Equity-Reserves	109				
Total gain/(loss) recognized in Equity-Retained earnings	562				
Purchases / Disbursements	6,000	9,000	21,299		40,000
Sales			(25,339)		
Repayments	(10,532)	(376)	(27,777)		
Settlements				(1,007)	
Transfer to assets out of level 3 due to control acquisition	(14,100)				
Transfer to assets held for sale	(478)				
Balance 31.12.2020	**8,448**	**177,860**	**264,068**	**-**	**40,000**
Gain/(loss) included in the income statement and relate to financial instruments included in the balance sheet at the end of the reporting period 1.1 - 31.12.2020	3	(10,818)	(19,181)		
- Interests		573	10,786		
- Gains less losses on financial transactions	2	(11,391)	(29,967)		
- Impairment losses	1				

Other receivables measured at fair value through profit or loss relate to a receivable from a variable consideration of € 40,000 recognized in 2020, as mentioned in detail in note 19.

553 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2019			
	Assets			
	Securities measured at fair value through other comprehensive income	Securities measured at fair value through profit or loss	Loans measured at fair value through profit or loss	Derivative financial assets
Opening Balance 1.1.2019	**49,377**	**175,625**	**337,557**	**16,663**
Total gain/(loss) recognized in Income Statement	627	4,725	(12,477)	(14,514)
- Net interest income	558	819	13,398	
- Gains less losses on financial transactions	33	3,906	(25,875)	(14,514)
- Impairment losses	36			
Total gain/(loss) recognized in Equity-Reserves	(9)			
Total gain/(loss) recognized in Equity-Retained earnings	(21,305)			
Purchases / Disbursements	201		74,339	
Sales				
Repayments	(806)	(513)	(83,487)	(462)
Settlements				(707)
Transfer to Level 3 from Level 1				
Transfer to Level 3 from Level 2	1,127	53		
Transfer out from Level 3 to Level 1				
Transfer to assets held for sale	(3,234)	(3)		
Balance 31.12.2019	**25,978**	**179,887**	**315,932**	**980**
Gain/(loss) included in the income statement and relate to financial instruments included in the balance sheet at the end of the reporting period 1.1 - 31.12.2019	627	4,596	(18,789)	51
- Interests	558	551	11,179	
- Gains less losses on financial transactions	33	4,045	(29,968)	51
- Impairment losses	36			

During the previous year, bonds amounting to € 1,180 were transferred from Level 2 to Level 3, since an internal model was used for valuation purposes.

554 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The following tables present the sensitivity analysis for financial instruments classified at Level 3 whose valuation was based on significant unobservable data as at 31.12.2020 and 31.12.2019:

31.12.2020							
	Significant Non-observable inputs	Quantitative information on non-observable inputs	Significant non-observable inputs change	Total effect in income statement		Total effect in equity	
				Favourable variation	Unfavourable variation	Favourable variation	Unfavourable variation
Derivative Financial Assets	Assessment of reserve adequacy for payment of hybrid securities dividends	From 2022 to the end, possibility 100%	Increase the possibility of paying dividends to 100%		(497)		
Bonds measured at fair value through other comprehensive income	Issuer price	Issuer price equal to 97,11%	Variation +/-10% in issuer price, Variation -/+10% in estimated return			102	(102)
Shares measured at fair value through other comprehensive income	Future profitability of the issuer, expected growth / Value indicators / Average weighted cost of capital	Value indicator P/BV 0.28x	Variation +/-10% in P/B and EV/Sales multiples valuation method. Wacc +/-1%			242	(241)
Bonds measured at fair value through profit or loss	Issuer price - Credit spread - Assessment of reserve adequacy for payment of hybrid securities dividends	Issuer price equal to 88.61% / Average credit spread equal to 1.411 bps. From 2023 to the end, possibility 100%	Variation +/-10% in issuer price, -/+10% in adjustment of estimated Credit Risk, -/+ 1 year on the starting date for dividend payments	6,127	(5,951)		
Shares measured at fair value through profit or loss	Value Indicators	Adjustment on cash flows discounting according to Business plan of issuer (Average expected rate of Business plan implementation 90%)	Business plan implementation: scenario analysis on the expected cash flows +/-35%	1,900	(2,500)		
Loans measured at fair value through profit or loss	Expected credit loss and cash flows from credit risk of the counterparty	Average credit spread and liquidity premium equal to 36.66%	Decrease of the expected cash flows by 10% on loans individually assessed		(12,986)		
Other Receivables measured at fair value through profit or loss	Cash flows from the management of the underlying receivables portfolio	Value of collateral with real estate equal to € 607.6 million and third parties equal to € 42.4 million	Variation of +/- 4% in the valuation of real estate collateral and Variation of +/- 33% on the third parties claims	9,000	(7,000)		
Total				**17,027**	**(28,934)**	**344**	**(343)**

555 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

31.12.2019							
	Significant Non-observable inputs	**Quantitative information on non-observable inputs**	**Significant non-observable inputs change**	**Total effect in income statement**		**Total effect in equity**	
				Favourable variation	**Unfavourable variation**	**Favourable variation**	**Unfavourable variation**
Derivative Financial Assets	The probability of default and loss given default of the counterparty (BCVA adjustment) calculated using an internal model	Average probability of default equal to 100% and average loss in the case of default of counterparty equal to 56%	Increase the probability of default through reduction of internal ratings by 2 scales/ increase the loss given default by 10%		(156)		
	Assessment of reserve adequacy for payment of hybrid securities dividends	From 2022 to the end, possibility 100%	Increase the possibility of paying dividends to 100%		(1)		
Bonds measured at fair value through other comprehensive income	Issuer price / Bond yield	Issuer price equal to 94.01% / Average bond yield equal to 9.32%	Variation +/-10% in issuer price, -/+10% in adjustment of estimated credit risk			273	(269)
Shares measured at fair value through other comprehensive income	Future profitability of the issuer, expected growth / Value indicators / Average weighted cost of capital	Value indicator P/BV 0,41x, / WACC +-1%	Variation +/-10% in P/B and EV/Sales multiples valuation method. Wacc +/-1%			262	(260)
Bonds measured at fair value through profit or loss	Issuer price - Credit spread - Assessment of reserve adequacy for payment of hybrid securities dividends	Issuer price equal to 85.47% / Average credit spread equal to 1922 bps From 2022 to the end, possibility 100%	Variation +/-10% in issuer price, -/+10% in adjustment of estimated Credit Risk, -/+ 1 year on the starting date for dividend payments	5,142	(5,002)		
Loans measured at fair value through profit or loss	Expected credit loss and cash flows from credit risk of the counterparty	Average credit spread and liquidity premium equal to 32,07%	Decrease of the expected cash flows by 10% on loans individually assessed		(8,480)		
Total				**5,142**	**(13,639)**	**535**	**(529)**

There are no significant interrelationships between the non-observable data that significantly affect the fair value.

556 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

40.5 Transfers of financial assets

The Bank in its ordinary course of business, transfers financial assets. In cases that, despite the fact that the contractual right to receive cash flows has been transferred, the risks and rewards remain with the Bank, these assets continue to be recognized on the balance sheet.

On 31.12.2020, the financial assets that have not been derecognized despite the contractual transfer of their cash flows, are derived from the following two categories of transactions:

a) Securitizations of financial assets

The Bank has securitized corporate and revolving consumer loans and credit cards in order to draw liquidity from the Euro system. In the context of these transactions, these assets have been transferred to special purpose entities, which have issued bonds. These loans and credit cards continue to be recognized as loans and advances to customers, since the Bank continues in all cases to retain the rewards and risks associated with them. This is justified by several factors which include the fact that the Bank owns these bonds and the entitlement to the deferred consideration from the transfer. Given that bonds are owned by the Bank, there is no liability for the Bank which actually arises from the transfer. The carrying amount of the securitized loans and credit cards on 31.12.2020 amounts to € 1,350,583 (31.12.2019: € 2,352,836).

In addition, the Bank has securitized retail loans through the fully consolidated special purpose company Katanalotika Plc. In this case also, retail loans are still recognized in the Bank's balance sheet as the Bank retains their risks and rewards through the ownership of bonds as well as the right to collect the deferred consideration. Within the fourth quarter of the fiscal year 2019 part of the bonds issued by the special purpose entity was transferred to third parties, while within the fourth quarter of the fiscal year 2020 the Bank repurchased these bonds resulting to no liability of the Bank on 31.12.2020 from the said transfer. On 31.12.2020 the carrying amount of these securitized loans amounts to € 493,145 (31.12.2019: € 499,242). On 31.12.2019 the carrying amount of the Bank's liability to the special purpose entity amounted to € 218,944 and the fair value of the loans and liability to the special purpose entity amounted to € 476,919 and € 185,921 respectively.

In addition, the Bank has proceeded to a shipping loan securitization transaction through the fully consolidated special purpose entity Alpha Shipping Finance Ltd. These loans are recognized in the category loans and advances to customers as the Bank retains the risks and rewards of the portfolio through its right to receive the deferred consideration. On 21.9.2020 the Bank acquired all the liabilities of the special purpose entity held by third parties, as a result of which it is the only lender of the special purpose entity Alpha Shipping Finance Ltd. Therefore, as at 31.12.2020, there is no liability of the Bank from the transfer of shipping loans. The carrying amount of the securitized shipping loans as at 31.12.2020 amounted to € 206,787 (31.12.2019: € 335,594). On 31.12.2019, the carrying amount of the liability of the Bank to the special purpose entity amounted to € 131,985 and the fair value of the loans and liability to the special purpose entity amounted to € 334, 613 and € 131,248 respectively.

Moreover, the Bank had securitized corporate loans to small and medium enterprises, through Alpha Proodos DAC, a fully consolidated special purpose entity. These loans continue to be recognized in loans and advances to customers, considering that the Bank retains the risks and rewards of these, by owning the subordinated bonds and the entitlement of deferred consideration. This transaction was recalled within the fourth quarter of the fiscal year 2020 with the repayment of all Alpha Proodos DAC bonds owned by the Bank. The carrying amount of the above securitized loans amounted to € 256,227 as at 31.12.2019 while there was no liability from the abovementioned transfer considering that total of the bonds were owned by the Bank.

Finally, in the context of the implementation of the strategic plan for 2020 – 2022 (note 48), the Bank, on 30.4.2020, proceeded to a securitization transaction of non performing retail and corporate loans ("Galaxy"). More specifically, non performing loans were transferred to the special purpose entities Orion X Securitisation Designated Activity Company, Galaxy II Funding Designated Activity Company, Galaxy III Funding Designated Activity Company and Galaxy IV Funding Designated Activity Company, established in Ireland. In this case also, these loans are still recognized on the Balance Sheet of the Bank as at the date of the financial statements, considering that the Bank retain the risks and rewards resulting from the abovementioned loans, as the bonds issued by the above special purpose entities are owned by the Bank. The carrying amount of these securitized receivables as at 31.12.2020 amounted to € 6,148,332.

b) Sale and repurchase agreements of debt securities

The Bank as at 31.12.2020 has proceeded with the transfer of Greek Government Bonds and Treasury bills, other issuers' bonds and bonds of other countries with a repurchase agreement. These securities are still recognized in the Bank's investment portfolio and the respective amounts are presented in the following tables.

	31.12.2020			
	Securities measured at fair value through other comprehensive income			Securities measured at amortized cost
	Greek Government Bonds & Treasury Bills	Other Sovereign Bonds	Other Issuers' Bonds	Greek Government Bonds & Treasury Bills
Carrying amount of transferred securities	81,756	47,937	201,836	5,138
Carrying amount of related liability	(81,074)	(36,233)	(199,982)	(4,523)
Fair value of transferred securities	81,756	47,937	214,249	5,138
Fair value of related liability	(81,074)	(36,233)	(199,982)	(4,523)
Carrying amount of transferred securities	**682**	**11,704**	**14,267**	**615**

	31.12.2019			
	Securities measured at fair value through other comprehensive income			Securities measured at amortized cost
	Greek Government Bonds & Treasury Bills	Other sovereign Bonds	Other Issuers' Bonds	Greek Government Bonds & Treasury Bills
Carrying amount of transferred securities	3,297,872	745,204	360,009	740,581
Carrying amount of related liability	(2,742,413)	(719,815)	(275,673)	(638,324)
Fair value of transferred securities	3,297,872	745,204	360,009	748,433
Fair value of related liability	(2,742,413)	(719,815)	(275,673)	(638,324)
Carrying amount of transferred securities	**555,459**	**25,389**	**84,336**	**110,109**

558 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

40.6. Offsetting financial assets - liabilities

The following tables present derivative transactions under International Swaps and Derivatives Association (ISDA) contracts, which are signed with credit institutions as counterparties, as well as repurchase agreements for which a global master repurchase agreement is in force. In accordance with these contracts, the Bank is able to offset its assets and liabilities relating to a counterparty in case of a credit default.

Financial assets subject to offsetting

	31.12.2020					
	Gross amount of recognized financial assets	Gross amount of recognized financial liabilities offset	Net amount of financial assets presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral received	
Derivatives	1,090,893		1,090,893	(237,207)	(1,673)	852,013
Reverse repos	442,968	(202,943)	240,025	(240,025)		

	31.12.2019					
	Gross amount of recognized financial assets	Gross amount of recognized financial liabilities offset	Net amount of financial assets presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral received	
Derivatives	840,234		840,234	(202,595)	(10,356)	627,283
Reverse repos	1,164,950		1,164,950	(1,164,950)		

Financial liabilities subject to offsetting

	31.12.2020					
	Gross amount of recognized financial liabilities	Gross amount of recognized financial assets offset	Net amount of financial liabilities presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral received	
Derivatives	1,755,174		1,755,174	(237,207)	(1,509,308)	8,658
Repos	442,939	(202,966)	239,973	(239,973)	629	629

	31.12.2019					
	Gross amount of recognized financial liabilities	Gross amount of recognized financial assets offset	Net amount of financial liabilities presented in the balance sheet	Related amounts not offset		Net Amount
				Financial instruments	Cash collateral received	
Derivatives	1,446,767		1,446,767	(202,595)	(1,243,517)	656
Repos	1,551,811		1,551,811	(1,164,950)	(1,841)	385,020

559 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Reconciliation of the net amount of financial assets and liabilities presented in the balance sheet

	31.12.2020			
	Note	Net amount presented in the balance sheet	Carrying amount of financial assets in the balance sheet	Financial assets not in scope of offsetting disclosures
Type of financial asset				
Derivative financial instruments	18	1,090,893	1,272,924	182,030
Reverse repos	16	240,025	240,025	

	31.12.2020			
	Note	Net amount presented in the balance sheet	Carrying amount of financial liabilities in the balance sheet	Financial liabilities not in scope of offsetting disclosures
Type of financial liability				
Derivative financial instruments	18	1,755,174	1,769,222	14,047
Repos	27	239,973	524.715	284,719

	31.12.2019			
	Note	Net amount presented in the balance sheet	Carrying amount of financial assets in the balance sheet	Financial assets not in scope of offsetting disclosures
Type of financial asset				
Derivative financial instruments	18	840,234	1,024,484	184,249
Reverse repos	16	1,164,950	1,164,950	

	31.12.2019			
	Note	Net amount presented in the balance sheet	Carrying amount of financial liabilities in the balance sheet	Financial liabilities not in scope of offsetting disclosures
Type of financial liability				
Derivative financial instruments	18	1,446,767	1,447,703	935
Repos	27	1,551,811	6,543,219	4,991,408

In addition, it is disclosed that within the framework of the abovementioned contracts, apart from the cash collateral received, securities of nominal amount of € 900,000 (31.12.2019:€ 870,000) have been used as collateral.

The amounts are presented in thousands of Euro unless otherwise indicated

41. Capital adequacy

The policy of the Bank is to maintain strong capital ratios and ample buffers over requirements in order to ensure the delivery of Alpha Bank's strategy and the development and trust of depositors, shareholders, markets and business partners. Share capital increases are conducted following resolutions of the General Meeting of Shareholders or of the Board of Directors, in accordance with the Articles of Incorporation and the relevant laws.

For the period that the Hellenic Financial Stability Fund (HFSF) participates in the Share Capital of the Bank, the purchase of own shares is not allowed without its approval, according to the Relationship Framework Agreement (RFA) which has been signed between the Bank and the HFSF.

The capital adequacy ratio compares the Bank's regulatory capital with the risks that the Bank undertakes (Risk Weighted Assets RWAs). Regulatory capital includes Common Equity Tier 1 (CET1) capital (share capital, reserves, minority interests), additional Tier 1 capital (hybrid securities) and Tier 2 capital (subordinated debt). RWAs include the credit risk of the investment portfolio, the market risk of the trading book and the operational risk.

Alpha Bank, as a systemic bank, is supervised by the Single Supervisory Mechanism (SSM) of the European Central Bank (ECB), since November 2014, to which reports are submitted every quarter. The supervision is conducted in accordance with the European Regulation 575/2013 (CRR) and the relevant European Directive 2013/36 (CRD IV), which was incorporated into the Greek Law through the Law 4261/2014. The framework is broadly known as Basel III.

For the calculation of capital adequacy ratio the above regulatory framework is followed. In addition:

- Besides the 8% capital adequacy limit, there are applicable limits of 4.5% for CET1 ratio and 6% for Tier 1 ratio respectively
- The maintenance of capital buffers additional to the CET1 Capital are required. In particular:
  - Capital conservation buffer stands at 2.5%.
  - Bank of Greece through Executive Committee Acts set the following capital buffers:
    - Countercyclical capital buffer equals to "zero percent" (0%) for 2020.
    - Other systemically important institutions (O-SII) buffer, which will gradually rise to "one percent" (1%) from 1.1.2019 to 1.1.2023. For 2020, the O-SII buffer stands at 0.5%.

These limits should be met both on a standalone and on a consolidated basis.

	31.12.2020	31.12.2020 (pro forma)*	31.12.2019
Common Equity Tier I Ratio	17.2%	17.5%	18.2%
Tier I Ratio	17.2%	17.5%	18.2%
Capital Adequacy Ratio**	**18.4%**	**18.7%**	**18.3%**

On 28 December 2020, the ECB informed Alpha Bank that since 31st January 2021 the minimum limit for the Overall Capital Requirement (OCR) remains unchanged from 2020 at 14%. The OCR is composed by the minimum own funds requirements (8%), according to article 92(1) of the CRR, the additional Pillar II own funds requirements (P2R), according to article 16(2) (a) of the Regulation 1024/2013/EU which corresponds to 3%, and the combined buffer requirements (CBR), according to article 128(6) of the Directive 2013/36/EU which correspond to 3%. The above minimum ratio should be maintained on a phase-in basis under applicable transitional rules of the CRR/CRD IV, at all times.

On February 13th 2020, Alpha Bank issued a Euro 500 million, Tier 2 bond with 10-year maturity callable after 5 years at a yield of 4.25%, listed on the Luxembourg Stock Exchange.

On March 4th 2021, Alpha Bank placed a Euro 500 million Tier 2 bond aiming to maintain strong capital ratios and ample buffers over requirements. The subordinated bond has a 10.25-year maturity and is callable anytime between year 5 and year 5.25 with a coupon of 5.5%. The bond is listed on the Luxembourg Stock Exchange – EuroMTF Market.

* The above ratios include the audited year end profits.

** Data relating to the disclosure of supervisory information on risk management capital adequacy (Pillar III - Regulation 575/2013) will be published on the Bank's website.

561 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Measures taken for the banks in order to tackle Covid-19 pandemic

As per the announced regulatory measures by European Banking Authority (EBA) and ECB, in view of the COVID-19 outbreak, decided that European banking institutions can temporarily deviate from the minimum capital regulatory thresholds.

Both ECB and SSM took measures, to tackle the COVID-19 pandemic, in order for them to continue finance the economy and fulfil their role.

Specifically, on 12 March, the ECB and the EBA announced the following relaxation measures for the minimum capital requirements for Banks in the Eurozone:

- Banks are temporarily allowed to operate below the level of capital defined by the Capital Conservation Buffer and the Countercyclical Buffer. In addition, on 28 July 2020, the ECB announced through a press release that financial institutions are allowed to operate below the aforementioned thresholds at least up to the end of 2022.
- Furthermore, the upcoming change under CRD V regarding the P2R buffer was brought forward allowing the Pillar 2 requirement (P2R) to be covered by Additional Tier 1 (AT1) capital by 18.75% and Tier 2 (T2) capital by 25% and not only by CET 1.

The European Commission decided to revise the existing regulatory framework by bringing forward regulations that would normally come with the CRR2/CRDV framework as well as provide a greater flexibility to the phase-in of the impact of the IFRS 9 on capital. The revised framework was published in the Official Journal of the European Union as at June 22, 2020.

In 22 December 2020, EU Regulation 2176/2020 of the Council of 12 November 2020, amending EU Regulation 241/2014 concerning the deduction of software assets from CET1 capital, was published in the Official Journal of the European Union.

In 26 June 2020, the Bank of Greece under an Executive Committee Act determined the capital buffer of systemically important institutions (O-SII) at 0,50%, maintaining stable for 2021 and extending consequently the existing phasing-in period. The third and the fourth phases have been delayed by 12 months each and will apply starting from 1 January 2022 and 1 January 2023 respectively. This decision is in the context of the response to Covid19 pandemic in order to mitigate the subsequent financial impact.

Stress Test

EU-wide stress test is primarily focused on the assessment of the impact of risk drivers on the solvency of banks. Banks are required to stress a common set of risks (credit risk – including securitisations – market risk and counterparty credit risk, operational risk – including conduct risk). The EU – Stress Test is a biannual exercise. However due to the outbreak of COVID – 19 (Coronavirus) and its global spread, EBA decided to postpone until 2021 the EU-wide Stress Test Exercise of 2020 to allow banks to focus on and ensure continuity of their core operations. For 2020, the EBA carried out additional EU-wide transparency exercise in order to provide updated information on banks' exposures and asset quality to market participants. On 21.12.2020, SSM announced that the EU-wide Stress Test is to be launched in 29 January 2021 and its results will be published at the end of July 2021.

42. Related-party transactions

The Bank enters into a number of transactions with related parties in the normal course of business. These transactions are performed at arm's length and are approved by the respective bodies of the Bank.

a. The outstanding balances of the Bank's transactions with key management personnel consisting of members of the Bank's Board of Directors and the Executive Committee, their close family members and the entities controlled by them, as well as, the results related to these transactions are as follows:

	31.12.2020	31.12.2019
Assets		
Loans and advances to customers	1,791	1,758
Liabilities		
Due to customers	2,257	1,017
Employee defined benefit obligations	219	277
Provisions	650	1,253
Total	**3,126**	**2,547**
Letters of guarantee and approved limits	**2,159**	**2,059**

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Interest and similar income	36	41
Fee and commission income	1	1
Total	**37**	**42**
Expenses		
Interest expense and similar charges	4	15
Remuneration paid to key management and close family members	5,667	5,690
Total	**5,671**	**5,705**

According to the decision of the General Meeting of Shareholders held at 29.6.2018, a compensation scheme is operating for the Bank's Senior Management, the terms of which were specified through a Regulation issued subsequently. The program is voluntary, does not constitute business practice and the program may be terminated in the future by a decision of the General Meeting of the Shareholders. It provides incentives for the eligible personnel to comply with the terms of departure, proposed by the Bank, thus ensuring the smooth (only during the period and under the terms and conditions approved by the Bank) departure and succession of Senior Management.

b. The outstanding balances with the Bank's subsidiaries, associates and joint ventures as well as the results related to these transactions are as follows:

i. Subsidiaries

	31.12.2020	31.12.2019
Assets		
Due from banks	365,795	458,950
Derivative financial assets	5,841	15,290
Loans and advances to customers	2,019,923	2,021,018
Investment securities measured at fair value through other comprehensive income	233,231	248,536
Investment securities measured at fair value through profit or loss	157,261	168,412
Loans and advances to customers measured at fair value through profit or loss	18,219	
Right-of-use assets	7,106	7,106
Other assets	2,625	4,949
Assets held for sale		25,056
Total	**2,810,001**	**2,949,317**

563 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

	31.12.2020	31.12.2019
Liabilities		
Due to banks	313,498	586,054
Due to customers	1,498,440	1,089,323
Derivative financial liabilities	903	787
Debt securities in issue and other borrowed funds	15,918	148,432
Lease liabilities	7,160	7,160
Other liabilities	248,157	10,730
Total	**2,084,076**	**1,842,486**
Letters of guarantee and others guarantees	**392,021**	**435,439**

For the above outstanding balance of letters of guarantee the Bank has recorded as at 31.12.2020 a provision amounting to € 28,324 (31.12.2019: € 22.815).

In addition to the financing from the Bank of its subsidiaries which have issued debt, guarantees have been given in relation to these debt issued amounting to € 15,542 at 31.12.2020 (31.12.2019:€ 15,542).

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Interest and similar income	41,542	50,278
Fee and commission income	17,656	19,123
Dividend income	3,440	12,092
Gains less losses on financial transactions	32,805	226
Gains less losses on derecognition of financial assets measured at amortized cost	3,117	1,431
Other income	6,744	4,687
Total	**105,304**	**87,837**
Expenses		
Interest expense and similar charges	11,053	23,518
Amortization of right issues	2,576	2,664
Commission expense	789	269
Gains less losses on financial transactions	34,235	19,319
General administrative expenses	24,952	17,743
Impairment losses and provisions to cover credit risk	1,040	55,947
Total	**74,645**	**119,460**

ii. Joint ventures

	31.12.2020	31.12.2019
Asset		
Loans and advances to customers	9,624	8,451
Other Assets	97	
Total	**9,721**	**8,451**
Liabilities		
Due to customers	13,721	14,722
Total	**13,721**	**14,722**

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Interest and similar income	410	835
Gains less losses on financial transactions	1,173	786
Other income	48	
Total	**1,631**	**1,621**
Expenses		
Interest expense and similar charges	2	17
Total	**2**	**17**

The amounts are presented in thousands of Euro unless otherwise indicated

iii. Associates

	31.12.2020	31.12.2019
Asset		
Loans and advances to customers	54,835	52,753
Other Assets	44	905
Total	**54,879**	**53,658**
Liabilities		
Due to customers	841	3,864
Other Liabilities		2,265
Total	**841**	**6,129**

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Interest and similar income	912	889
Fee and commission income	2	36
Gains less losses on financial transactions	1,809	4,228
Other income	35	
Total	**2,758**	**5,153**
Expenses		
General administrative expenses	5,844	16,067
Gains less losses on financial transactions		757
Total	**5,844**	**16,824**

For the impairments of participations to subsidiaries, joint ventures and associates there are references in the relevant notes.

c. The Hellenic Financial Stability Fund (HFSF) exerts significant influence on the Bank. In particular, in the context of Law 3864/2010 and based to Relationship Framework Agreement (RFA) signed on 23.11.2015, which replaced the previous one signed in 2013, HFSF has participation in the Board of Directors and other significant Committees of the Bank. Therefore, according to IAS 24, HFSF and its related entities are considered related parties for the Bank.

The outstanding balances and the results related to these transactions are analyzed as follows:

	From 1 January to	
	31.12.2020	31.12.2019
Income		
Fee and commission income	4	8

43. Auditors' fees

The total fees of "Deloitte Certified Public Accountants S.A.", statutory auditor of the Bank are analyzed below, in accordance with the provisions of paragraph 2 and 32, article 29, of Law 4308/2014.

	From 1 January to	
	31.12.2020	31.12.2019
Statutory audit of the annual accounts*	1.550	1.447
Other audit services		13
Issuance of tax certificate	201	198
Other non-audit services	137	288
Total	**1,888**	**1,947**

* Statutory audit of the annual accounts include expenses amounting up to 2% of the approved fees.

565 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

44. Assets held for sale

	31.12.2020	31.12.2019
Investments in subsidiaries, associates and joint ventures	131,020	900,974
Fixed Assets	435	14,119
Loans	143,318	456,744
Total	**274,773**	**1,371,837**

The Bank had commenced the process for the partial sale of the investments in subsidiaries, associates and joint ventures as well as the sale of retail and wholesale loan portfolios, the balances of which are presented in the table above and described in detail below. In the same context, Bank's real estate had been classified as Held for Sale.

In accordance with IFRS 5 Assets held for sale or disposal groups held for sale are valued at the lower between their carrying amount and fair value less costs to sell and are presented in the balance sheet separately from the other assets and liabilities.

As mentioned below, during the year the Bank's participations in AGI-CYPRE Ermis and APE Commercial Property SA were reclassified in "Investments in subsidiaries, associates and joint ventures" as the criteria of IFRS 5 are no longer met for their classification in "Assets held for sale". The Bank did not restate the comparative period as detailed in note 47.

Investments in joint ventures

The Bank is at an advanced stage of the process of selling its participation in the joint venture APE Investment Property SA with a carrying amount of € 42,300 on 31.12.2020 (31.12.2019: € 42,300). On 2.2.2021 the binding agreement for the transfer of the Bank's shares to APE Investment Property SA was signed. The Bank proceeded to the determination of the fair value of its participation and from the valuation no result was recognized for the years 2020 and 2019.

The above participation of the Bank is included in the operating segment "Other / Elimination center" of note 39 "Operating segments".

Regarding APE Commercial Property SA which in previous years was classified in "Assets held for sale", the conditions for its classification are not met and this led to its reclassification into "Investments in subsidiaries, associates and joint ventures" at a carrying amount of € 3,917, as the Bank intends to put the company into liquidation in the near future. The effect of the reclassification is described in note 47.

Investments in other subsidiaries

The Bank, in order to optimize the Group's corporate structure, has begun in 2018 the reorganization of the Group's main subsidiaries through grouping similar business units under three corresponding pillars, which will be controlled by Group companies, that was completed in December 2020. The first pillar included companies operating in the financial sector in Greece, the second one is comprised of companies operating in the financial sector in Europe and the third pillar included real estate companies.

The Group's subsidiaries that were included in the first pillar are ABC Factors A.E., Alpha Asset Management A.E.D.A.K, Alpha Finance A.E.P.E.Y. and Alpha Leasing A.E. The Bank transferred to its subsidiary Alpha Holdings Single Member SA the participations of the abovementioned companies within December 2020. Specifically,

- On 15.12.2020 the transfer of all shares of Alpha Leasing A.E., which was entirely owned by the Bank, was completed with the payment of the consideration of € 141,156. The outcome from the transfer of € 7,050 decreased the Bank's participation cost in the intermediate parent Alpha Holdings Single Member SA (note 21).
- On 21.12.2020 the transfer of all shares of ABC Factors A.E., which was entirely owned by the Bank, was completed with the payment of the consideration of € 155,157. The outcome from the transfer amounted to a profit of € 100,961 and was recognized in "Gains less losses on financial transactions" in the Income Statement.
- On 23.12.2020 the transfer of all shares of Alpha Finance A.E.P.E.Y. was completed with the payment of the consideration of € 30,268. The outcome from the transfer amounted to a profit of € 3,142 and was recognized in "Gains less losses on financial transactions" in the Income Statement.

566 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

- On 24.12.2020 the transfer of all shares of Alpha Asset Management A.E.D.A.K was completed with the payment of the consideration of € 39,316. The outcome from the transfer amounted to a profit of € 24,831 and was recognized in "Gains less losses on financial transactions" in the Income Statement.

The second pillar, included Alpha Bank Romania SA, Alpha Bank Cyprus Ltd, and Alpha Bank Albania SH.A. which were transferred to Alpha International Holdings Single Member SA. Specifically,

- On 30.12.2020 the transfer of all shares of Alpha Bank Cyprus Ltd was completed with a payment of the consideration of € 204,272. In addition, on 30.12.2020 the transfer of the total of 75,294,118 convertible bonds, with a nominal value of € 0.85 each issued by Alpha Bank Cyprus Ltd and owned by the Bank, to Alpha International Holdings Single Member SA with the payment of the consideration of € 64,000. The sale of Alpha Bank Cyprus Ltd did have any impact on the income statement.
- On 30.12.2020 the transfer of the shares of Alpha Bank Romania was completed with the payment of the consideration of € 362,542. The outcome from the transfer of € 188,526 decreased the Bank's participation cost in the intermediate parent Alpha International Holdings Single Member SA(note 21).
- On 30.12.2020 an amendment of the initial sale purchase agreement was signed, for the determination of the final consideration, amounting to € 66,938 and on 25.1.2021 the transfer of Alpha Bank Albania SH.A. to Alpha International Holdings Single Member SA. was completed. Its carrying amount on 31.12.2020 amounts to € 66,938 (31.12.2019: € 75,449).

As of 31.12.2019 the second pillar included AGI-CYPRE Ermis, however due to the change in the Bank's Management plan and as the entity is not expected to be sold, the conditions for its classification in the category "Assets held for sale" are not met and this led to its reclassification into "Investments in subsidiaries, associates and joint ventures" at a zero carrying amount. The effect of the reclassification is described in note 47.

The third pillar included Emporiki Ventures Capital Emerging Markets Ltd and AEP Attikis SA which were transferred to Alpha Group Investments Ltd within December 2020, as follow,

- On 21.12.2020 the transfer of all shares of Emporiki Ventures Capital Emerging Markets Ltd, owned by the Bank, was completed with the payment of the consideration of € 14,378. The outcome from the transfer amounted to a loss of € 122 and was recognized in "Gains less losses on financial transactions" in the Income Statement.
- On 21.12.2020, the transfer of the shares of AEP Attikis SA, owned by the Bank, to the other shareholder of the company was completed with the payment of the consideration of € 5,771. The outcome from the transfer amounted to a profit of € 1,759 and was recognized in "Gains less losses on financial transactions" in the Income Statement.

From the valuation of the above subsidiaries for 2020, a loss of € 72,363 arose, which was recognized in "Gains less losses on financial transactions" in the Income Statement, while for the year 2019, loss was € 31,177.

In addition, the Bank has completed the process of receiving binding offers for the transfer of all shares of the subsidiary AEP Attikis II SA. Its carrying amount on 31.12.2020 amounts to € 21,782 (31.12.2019: € 21,782). The sale of the company was completed on 12.2.2021, without a loss for the Bank.

The above participation of the Bank were included in operating segment "Other / Limitation center" of note 39 "Operation segments".

Investment in associates

During the year 2018, the Bank initiated the process of obtaining binding offers for its participation in the associate company Alpha Investment Property I SA and considering that the requirements of IFRS 5 are met, the Bank's participation in Alpha Investment Property I SA was classified in "Assets held for sale" for the purposes of the preparation of Financial Statements as of 31.12.2018. In the first semester of 2019, Alpha Investment Property I SA implemented a share capital return that amounted to € 3,681 while at 11.6.2019 the transaction for the sale of the company's shares was completed. The consideration of the transaction, after the transaction costs, amounted to € 22,271, while a gain of € 3,716 was recorded in "Gains less losses on financial transactions" in the Income Statement.

Loans portfolio

Loan Portfolio A: Non-performing wholesale loans with collaterals

During 2019, the Bank initiated the process of the sale of Non-performing loans with collaterals in real property as well as other receivables, with carrying amount of € 409,118 as of 31.12.2019, which included receivables from consumer loans, wholesale loans, shipping loans and mortgage loans.

Regarding this portfolio, on 1.7.2020 the Bank entered into a binding agreement for the partial sale of a portfolio with a carrying amount of € 261,254 while a provision of € 25,000 was recognized by the Bank with regards to claimed receivables related to the sold loan portfolio. The transaction was completed on 17.7.2020. The consideration of the transaction for the transferred portfolio, as adjusted after transaction costs amounted to € 261,274. In addition, the consideration of the transaction includes a variable consideration, the fair value of which was determined at € 40,000, as at 31.12.2020. The result from the sale of the portfolio amounted to a profit of € 20 and is recognised in "Gain less losses on derecognition of financial assets measured at amortised cost".

The remaining portfolio remains in the category "Assets held for sale" it met the conditions for its classification as "held for sale" according to IFRS 5 as at 31.12.2020 and the Bank is expected to complete its sale within the first half of 2021.

From the aforementioned portfolio an amount of € 131,095 (31.12.2019: € 392,259) is included in the operating segment "Corporate Banking" and an amount of € 2,223 (31.12.2019: € 16,859) is included in the operating segment "Retail" of note 39 "Operating Segments".

Loan Portfolio B: Non Performing wholesale loans with collaterals

During the year 2019, the Bank initiated the process of the sale of Non-performing loans of a carrying amount of € 9,618 as of 31.12.2019 which included receivables from wholesale loans.

This aforementioned loan portfolio was sold in the third quarter of 2020. The consideration of the transaction, adjusted after transaction costs was € 9,358 while the result from the sale of the portfolio amounted to a loss of € 635 and is presented in "Gain less losses on derecognition of financial assets measured at amortised cost".

These loans were included in the operating segment "Corporate Banking" of note 39 "Operating Segments".

Loan Portfolio C: Non performing wholesale loans with collaterals

During the year 2018, the Bank commenced the process of the sale of Greek Non-Performing Wholesale Loans.

On 27.12.2018, the transfer of a part of the above portfolio was completed. The consideration for the transferred portfolio, as adjusted after transaction costs and other liabilities, amounted to € 258,833, while a loss of € 17,659 was recognized in "Gain less losses on derecognition of financial assets measured at amortised cost". The carrying amount of the remaining portfolio amounts to € 38,008 as of 31.12.2019.

On 24.12.2020 the transfer of a part of the remaining portfolio was completed. The consideration for the transferred portfolio, as adjusted after transaction costs and other liabilities, amounted to € 8,071, while a loss of € 358 was recognized in "Gains less losses on financial transactions". The remaining portfolio of carrying amount of 10,000 remains in the category "Assets held for sale" as it met the conditions for its classification as "held for sale" according to IFRS 5 as at 31.12.2020 and the Bank is expected to complete its sale the first half of 2021.

The abovementioned portfolio amounting to € 10,000 (31.12.2019 € 12,952) included in the operational segment "Corporate Banking" while as at 31.12.2019 an amount of € 25,056 was included in the operational segment "Other / Elimination Center" of note 39 "Operating Segments".

Fixed assets

The Bank initiated the process of sale of a portfolio of investment property, own used property and property obtained by auctions. During the first half, the sale of two properties at a consideration of € 1,128 and € 10.000 respectively was completed while a gain of € 138 was recognized in "Other Income" in the Income Statement and a loss of € 11 in "Other expenses" in the Income Statement respectively. The remaining assets with a carrying amount of € 3,125 did not meet the criteria for their classification in "Assets held for sale" in accordance with IFRS 5 and were reclassified in "Other Assets" as the sale transaction was not possible to be completed.

On 31.12.2020, a property with a carrying amount of € 435 was transferred from “Investment Property” to “Assets held for sale” as a relevant preliminary sale agreement has been signed.

Other items held for sale

In the assets held for sale the Bank’s participation in the company “Forthnet A.E.” is included with a carrying amount of one euro. On 13.11.2020 the sale of a part of the abovementioned participation was completed, for an amount of € 95 recognizing a profit of € 90 after transaction costs in “Gains less losses on financial transactions”. In addition, on 08.09.2020 and on 13.11.2020 the convertible bonds of “Forthnet S.A.” were sold for an amount of € 374, recognizing profit of € 364 after transaction costs in “Gains less losses on financial transactions” while on 31.12.2019 were valued at zero value. After the transaction, the Bank holds a percentage of 0.27% on the share capital of Forthnet S.A. The sale of the remaining percentage is was completed on 5.3.2021. In this category, the participations in V Telecom Investment SCA and V Telecom Investment General Partner S.A. were reclassified from the securities measured at fair value through other comprehensive income in June 2020 with a carrying value of € 478, as the Bank signed on 10.6.2020 a pre agreement for their sale, at a consideration equal to their carrying amount, which was completed on 6.10.2020 while for these shares the reserve of losses recorded directly in equity amounted to € 3,495.

The above are included in the functional section “Other / Elimination Center” of the note 39 “Operating Segments”.

The Bank assesses at each reporting date of the financial statements, the actions that are in place, with the purpose to classify, where the criteria of IFRS 5 are met (listed in note 1.2.16 of the Financial Statements), the assets and liabilities that are directly associated with them, as held for sale.

The fair value of fixed assets classified in “Assets held for sale” at each reporting date of the financial statements are calculated in accordance with the methods mentioned in note 1.2.6. and are classified in Level 3 as research facts, hypotheses and data concerning fixed assets with similar characteristics are used and so they include a wide range of non observable inputs.

45. Disclosures of Law 4151/2013

The purpose of the provisions of chapter B of Law 4151/2013 is the capitals from dormant deposit accounts that will be used by the Greek State to cover government needs, after the write off of rights of depositors or their legal heirs. According to the aforementioned the provisions of Law 4151/2013:

i. According to Law 4261/2014 dormant deposit account to credit Institution is an account on which no transaction by depositors has been recorded for a period of 20 years from the day following the last transaction (the crediting or capitalizing of interest to an account will not constitute a transaction and not interrupt the prescription),
ii. Following the expiry of the 20-year period, the credit institutions in Greece are obliged to transfer to the State the aggregate balance of dormant deposit accounts, including any interest, by the end of April of each year by depositing the relevant amount in a special account in the Bank of Greece, notify the General Accounting Office (GAO) and the General Directorate of Public Property to fulfill the obligations arising from the Law 4151/2013 and to provide information to beneficiaries and heirs after the lapse of 20 years for the transfer of the respective amounts, if asked (the abovementioned amounts will be recorded as income in the Annual State Budget),
iii. the auditors in the notes to the published annual financial statements of credit institutions will confirm whether or not they complied with the provisions of the law on dormant deposits indicating the amount that was transferred to the State.

For the fiscal year 2019 the Bank proceeded, at the end of April 2020, to the transfer of the balances of the dormant deposit accounts to the State (principals and relevant interest of deposits), of a total amount of € 4,156 on which the rights of depositors / heirs were written off in favor of the State until 31.12.2019, according to Law 4151/2013 and due to the suspension of the deadline for the completion of this twenty-year limitation period, pursuant to the 18.07.2015 CIP (Government Gazette B 84 / 18.07.2015), as it was in force through all its amendments, combined with no. 257 Civil Code.

For the fiscal year 2020, the amount of inactive deposit accounts that will be given from the Bank to the State within the year 2021, due to the limitation of these rights, according to Law 4151/2013, until 31.12.2020, is estimated in the amount of € 3,787.

46. Corporate events

- On 11.2.2020 the incorporation of the Bank's Branch in Luxembourg took place and on 19.6.2020 the transfer of the London Branch's activities to it was completed.
- On 3.3.2020 the Bank's subsidiary Emporiki Development & Real Estate Management A.E. was renamed to Alpha Holdings Single Member SA.
- On 11.3.2020 the Bank proceeded to the incorporation and on 19.3.2020 on the payment of share capital of the entities REOCO ORION X M.A.E., REOCO Galaxy II M.A.E. and REOCO Galaxy IV M.A.E., for an amount of € 50 each.
- On 23.3.2020 the Bank proceeded with a share capital increase in its subsidiary AGI-Cypre Ermis Ltd by paying € 65,000 in cash.
- The United Kingdom voted to leave the European Union in June 2016. The formal withdrawal process and the negotiations between the EU and the UK Government began in 2017. On January 29, 2020 the European Parliament ratified the withdrawal agreement of the UK from the EU. On December 31, 2020 the exit of the United Kingdom from European Union was completed.
- On 7.5.2020 the Bank proceeded with a share capital increase in cash in its subsidiary Alpha Group Investments Ltd by paying an amount of € 10,000.
- On 2.6.2020 the Bank participated proportionally to the mutual funds shares increase of the joint venture Alpha TANEO A.K.E.S. by paying in cash the amount of € 102.
- On 5.6.2020 and on 29.6.2020 the Bank proceeded with share capital increases in cash in its subsidiary Alpha Group Investments Ltd for an amount of € 3,500 and € 3,500 respectively.
- On 19.6.2020 the Bank incorporated its subsidiary, Alpha International Holdings Single Member SA by paying on 15.7.2020 and 20.11.2020 a total amount of € 1,280,000 and by virtue of 23.10.2020 no. ECB-SSM-2020-GRALP-16 decision of the European Central Bank.
- On 30.6.2020 the Bank proceeded with a share capital increase in cash in its subsidiary AGI-Cypre Ermis Ltd.by paying an amount of € 85,000.
- On 22.7.2020, the Bank acquired the full share capital and control of Cepal Holdings S.A., following the exercise on 1.7.2020 of the put option in accordance with the changed terms of the shareholders agreement.
- On 27.7.2020 the Bank made a payment of € 485 to cover its proportion, in order to complete the share capital increase of its subsidiary APE Fixed Assets A.E. following its advance payment of € 100 on 30.10.2019.
- On 2.9.2020 the Bank proceeded with a share capital increase in cash in its subsidiary Alpha Group Investments Ltd by paying an amount of € 15,399.
- On 10.9.2020 the Bank participated proportionally to the mutual funds shares increase of the joint venture Alpha TANEO A.K.E.S. by paying in cash the amount of € 408.
- On 24.9.2020 the Bank's participation, Visa Inc., through Class C preferred shares, released a value of $ 4,216,411 to its Class C shareholders by issuing Class A preferred shares and adjusting the conversion ratio of existing Class C preferred shares to common Class A shares traded on the NYSE. As a result, the Bank acquired an additional participation in the company through Class A preferred shares, valued to € 17,294 (24.9.2020). At the same time, the value of the existing Class C preferred shares held by the Bank was adjusted from € 34,052 (31.8.2020) to € 16,101 (24.9.2020).
- On 6.10.2020 the sale of the Bank's participations in V Telecom Investment S.C.A and V Telecom Investment General Partner S.A. based in Luxemburg was completed.
- On 11.11.2020 the sale of Bank's participation in Mastercard Incorporated was completed.
- On 13.11.2020 the partial sale of Bank's participation to Forthnet S.A., which corresponds to 5,30% of the company's share capital, was completed. Following the transaction's completion, the Bank currently holds 0,27% of the share capital of Forthnet S.A.
- On 27.11.2020 the Bank proceeded with a share capital increase in cash in its subsidiary Cepal Holding Societe Anonyme, by paying an amount of € 147,000.
- On 2.12.2020 the Bank proceeded with a share capital increase in cash in its subsidiary Alpha Group Investments Ltd by paying an amount of € 75,500.

- On 14.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and by virtue of 23.10.2020 no. ECB-SSM-2020-GRALP-16 decision of the European Central Bank, the Bank proceeded with a share capital increase in cash in its subsidiary, Alpha Holdings Single Member SA by paying an amount of € 197,304.
- On 15.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 375/3 / 27.11.2020 approval decision of Bank of Greece, the transfer of all shares of Alpha Leasing, owned entirely by the Bank, to Alpha Holdings Single Member SA was completed.
- On 21.12.2020 in the context of the reorganization plan of the Bank's subsidiaries, Alpha Real Estate and Investment Management (AREM-I) proceeded with a share capital increase in cash in Alpha Holdings Single Member SA by paying an amount of € 230.000. As a result in the share capital of Alpha Holdings Single Member SA the Bank participates with a percentage of 51% and AREM-I with a percentage of 49%.
- On 21.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 375/4 / 27.11.2020 approval decision of the Bank of Greece, the transfer of all shares of ABC Factors, owned entirely by the Bank, to Alpha Holdings Single Member SA was completed.
- On 21.12.2020, in the context of the reorganization plan of the Bank's subsidiaries, the transfer of all shares of Emporiki Venture Capital Emerging Markets Ltd, owned entirely by the Bank, to Alpha Group Investments Ltd. was completed.
- On 21.12.2020, in the context of the reorganization plan of the Bank's subsidiaries, the transfer of the shares of AEP Attiki SA, held by the Bank, to the other shareholder of the company, Alpha Group Investments Ltd., was completed.
- On 23.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 1/1708 / 22.12.2020 approval decision of the Hellenic Capital Market Commission, the transfer of all shares of Alpha Finance A.E.P.E.Y., held by the Bank and Alpha Real Estate and Investment Management (AREM-I), to Alpha Holdings Single Member SA was completed.
- On 23.12.2020 the Bank participated proportionally to the mutual funds shares increase of the joint venture Alpha TANEO A.K.E.S. by paying in cash the amount of € 49.
- On 24.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. 6/1684 / 15.9.2020 and 2/1708 / 22.12.2020 approval decisions of the Hellenic Capital Market Commission, the transfer of all shares of Alpha Asset Management A.E.D.A.K., held by the Bank and Alpha Real Estate and Investment Management (AREM-I), to Alpha Holdings Single Member SA was completed.
- On 28.12.2020, in the context of the reorganization plan of the Bank's subsidiaries and by virtue of the approval decision of the Central Bank of Cyprus dated 24.12.2020, the transfer of all shares of Alpha Credit Acquisition Company ltd to Alpha International Holdings Single Member SA was completed.
- On 28.12.2020, the liquidation of the Bank's subsidiary METEK SA. was completed.
- On 30.12.2020, in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. ECB-SSM-2020-GRALP-15-QLF-2020-091 joint decision of the European Central Bank and the Central Bank of Cyprus, the transfer of all shares of Alpha Bank Cyprus Ltd to Alpha International Holdings Single Member SA was completed. On the same date, all convertible bonds, issued by Alpha Bank Cyprus Ltd and held by the Bank, were transferred to Alpha International Holdings Single Member SA.
- On 30.12.2020 in the context of the reorganization plan of the Bank's subsidiaries and pursuant to no. Nr. FG / 613 / 2.11.2020 of the decision of the Central Bank of Romania, the transfer of the shares of Alpha Bank Romania SA, held by the Bank, to Alpha International Holdings Single Member SA was completed.
- On 30.12.2020, the Bank participated in a share capital increase of the company Ionian Hotel and Enterprises by paying an amount of € 5,200, resulting in a participation through preferred shares that correspond to 7% of the company's share capital.
- On 25.1.2021, in the context of the reorganization plan of the Bank's subsidiaries and in virtue to decision No. 3/ 13.1.2021 of the Central Bank of Albania and decision of Albania Competition Authority of 30.7.2020, the transfer of the shares of Alpha Bank Albania SH.A, totally owned by the Bank, to Alpha International Holdings Single Member SA was completed.
- On 12.2.2021 the disposal of the total shares of the Bank's subsidiary, Alpha Investment Property Attikis II SA, was completed.
- On 5.3.2021 the disposal of the remaining shares of Forthnet held by the Bank, following the partial sale of Bank's participation on 13.11.2020, was completed through the acceptance of a public offer addressed to the company's shareholders.

- On 12.3.2021 the Bank proceeded with share capital increase in cash to its subsidiary, Alpha Group Investments Ltd, by paying an amount of € 265,000.

47. Restatement of financial statements

Within the first half of 2020, the Bank, has amended the presentation of the loss resulting from sale of fixed assets. In particular, these amounts, that were hitherto been included in "General administrative expenses" category of the Income Statement, are now presented in "Other Expenses" category. This change aims to reflect more accurately the nature of its results, taking into account that the sale of fixed assets is an ancillary and not a core activity, while at the same time it is consistent with the presentation of impairment losses of fixed assets, which are also included in "Other Expenses".

In addition, within the first half of the year, the Bank modified the presentation of the income statement accounts for operating risk. In particular, these items that were hitherto been included in "General administrative expenses" category of the Income Statement, are now presented in "Other expenses" category. This change is intended to provide a more accurate picture of the nature of its results, taking into account that the corresponding provisions for operating risk events are recorded in "Other Expenses". In addition within the second half of 2020 the Bank restated, in order to appropriately present its results of operations, the negative interest presentation reclassifying negative interest from interest bearing assets from "Interest and similar income" to "Interest expense and related charges" in the Income Statement. Similarly the presentation of negative interest from interest bearing liabilities was reclassified from "Interest and related expenses" to "Interest and related income" of the Income Statement.

Finally, the Bank retrospectively restated the preferred Class C shares held in Visa International from the category of securities valued at fair value through other comprehensive income to the category of securities valued at fair value through profit or loss. In particular, the classification of these shares was revised as the definition of "equity instrument" under IAS32 is not met and therefore there is no option to classify them in the portfolio of securities measured at fair value through other comprehensive income. Consequently, these shares were reclassified retrospectively from the date of first application of IFRS 9 to fair value through profit or loss category of the investment portfolio as "Other variable yield securities".

As a result of the above changes, Income Statement, Statement of Comprehensive Income and Balance Sheet of the previous year were restated, as shown in the following tables:

The restated Income Statement from 1.1 to 31.12.2019 is presented below:

	From 1 January to 31.12.2019		
	Published amounts	**Restatement**	**Restated amounts**
Interest and similar income	1,734,294	90,957	1,825,251
Interest expense and similar charges	(437,804)	(90,957)	(528,761)
Net interest income	1,296,490	-	1,296,490
Fee and commission income	369,809		369,809
Commission expense	(80,888)		(80,888)
Net fee and commission income	288,921	-	288,921
Dividend income	23,760		23,760
Gains less losses on derecognition of financial assets measured at amortized cost	(16,421)		(16,421)
Gains less losses on financial transactions	313,595	8,961	322,556
Other income	16,813		16,813
Total other income	337,747	8,961	346,708
Total income	**1,923,158**	**8,961**	**1,932,119**
Staff costs	(346,199)		(346,199)
Expenses for separation schemes	(49,615)		(49,615)
General administrative expenses	(384,215)	5,917	(378,298)
Depreciation and amortization	(109,419)		(109,419)
Other expenses	(27,090)	(5,917)	(33,007)
Total expenses before impairment losses and provisions to cover credit risk	**(916,538)**	**-**	**(916,538)**
Impairment losses and provisions to cover credit risk	(924,799)		(924,799)
Profit/(loss) before income tax	**81,821**	**8,961**	**90,782**
Income tax	(27,252)	(2,599)	(29,851)
Profit/(loss) for the year	**54,569**	**6,362**	**60,931**
Earnings/(losses) per share			
Basic and diluted (€ per share)	0.04		0.04

The restated statement of comprehensive income for the year from 1 January to 31.12.2019, is presented below:

	From 1 January to 31.12.2019		
	Published amounts	**Restatement**	**Restated amounts**
Profit/(loss) for the year, recognized in the Income Statement	**54,569**	**6,362**	**60,931**
Other comprehensive income			
Items that may be reclassified to the Income Statement			
Net change in investment securities' reserve measured at fair value through other comprehensive income	475,994		475,994
Net change in cash flow hedge reserve	(130,454)		(130,454)
Income Tax	(100,206)		(100,206)
Items that may be reclassified to the Income Statement	**245,334**	**-**	**245,334**
Items that will not be reclassified to the Income Statement			
Net change in actuarial gains/(losses) of defined benefit obligations	(10,931)		(10,931)
Gains/(losses) from equity securities measured at fair value through other comprehensive income	(11,160)	(8,961)	(20,121)
Income tax	6,406	2,599	9,005
Items that will not be reclassified to the Income Statement	**(15,685)**	**(6,362)**	**(22,047)**
Other comprehensive income for the year, after income tax	229,649	(6,362)	223,287
Total comprehensive income for the year	**284,218**	**-**	**284,218**

573 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

The restated balance sheet as of 1.1.2019 and 31.12.2019, is presented below:

	1.1.2019		
	Published amounts	**Restatement**	**Restated amounts**
Investment securities			
- measured at fair value through other comprehensive income	5,691,866	(21,403)	5,670,463
- measured at fair value through profit or loss	180,175	21,403	201,578
Total Impact on Total Assets	**5,872,041**	**-**	**5,872,041**

	31.12.2019		
	Published amounts	**Restatement**	**Restated amounts**
Investment securities			
- measured at fair value through other comprehensive income	6,224,379	(30,364)	6,194,015
- measured at fair value through profit or loss	187,148	30,364	217,512
Total Impact on Total Assets	**6,411,527**	**-**	**6,411,527**

In addition, regarding the reclassification of the Bank's participation in APE Commercial Property joint venture and the subsidiary AGI CYPRE Ermis, as mentioned in note 44 “Assets held for sale”, the Bank assessed their impact on its financial position as non significant in terms of the total assets of the Balance Sheet, while there was no impact on the results and Equity at the beginning of the comparative period, given that the participations were valued at the lower of recoverable and carrying amount. Therefore, there was no retrospective restatement of the comparative periods.

In case of retrospective restatement of APE Commercial Property, the effect on the Balance Sheet of 1.1.2019 and 31.12.2019 would have been the following:

	31.12.2019	**1.1.2019**
Investments in subsidiaries, associates and joint ventures	3,917	3,917
Assets held for sale	(3,917)	(3,917)
Total Impact on Total Assets	**-**	**-**

In case of retrospective restatement of AGI CYPRE Ermis, the effect on the Balance Sheet of 1.1.2019 and 31.12.2019 would have been the following:

	31.12.2019	**1.1.2019**
Investments in subsidiaries, associates and joint ventures		(22,657)
Assets held for sale		22,657
Total Impact on Total Assets	**-**	**-**

574 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

48. Strategic Plan 2020 – 2022

In November 2019, the Bank announced the framework of the strategic plan 2020-2022, which has as its main priority the acceleration of the clean up of its balance sheet. Detailed references regarding the strategic plan included on the Annual Board of Director's Report of 31.12.2020. The strategic framework includes: (a) the transaction of a securitization of non-performing loans, amounting to € 11 billion (Galaxy transaction), (b) the inclusion of the Securitization Transaction in the "Hercules" asset protection scheme of Law 4649/2019 for the limitation of the impact of the Securitization Transaction on the capital adequacy of the Bank and the subsequent sale of the portfolio, (c) the transfer of the management of non-performing exposures to the company "Cepal", a licensed loan management company under Law 4354/2015 and the subsequent sale of the shares of "Cepal" to a third party investor and (d) the hive-down of the Bank's banking activities.

- The Bank completed the securitization transaction of non-performing loans, as it is mentioned in note 19, and on 6.8.2020 announced the submission of an application for the inclusion under Law 4649/2019 of the Orion and Galaxy II securitizations of the Galaxy transaction, in the "Hercules" asset protection scheme. The application concerns the provision of a guarantee by the Greek State for the senior notes with a total value of up to € 3,04 billion. In the same context, on 22.10.2020, it submitted an application for the third Galaxy IV securitization. The application concerns the provision of a guarantee by the Greek State for the senior notes of the Galaxy IV securitization with a total value of up to € 650 million.
- The Bank, after the approval of the Board of Directors on 26.11.2020, signed a private business transfer agreement with Cepal Hellas Financial Services Single Member SA for the carve-out of the Bank's Non-Performing Loans Unit for retail and wholesale Banking. The fair value of the transferred business amounted to € 240 million. The transfer of the Non-performing Exposure management activity was completed on 1.12.2020, and from this date Cepal Hellas Financial Services Single Member SA took over the management of past due or non-performing debts to the Bank, both current and future, as it is mentioned in detail in note 32.

  In this context, on 22 February 2021, a binding agreement was entered into with an Investor that includes:

  - The sale of 80% of its loan servicing subsidiary, Cepal Holdings SA. More specifically, the Bank will sell 80% of the share capital of CEPAL, while maintaining the remaining 20% and all the usual management rights according to the amount of its participation.
  - The sale of 51% of the mezzanine and junior securitization notes of the Non-performing Exposure portfolio amounting to € 10.8 billion. It is noted that the Bank will maintain 5% of the mezzanine and junior securitization notes, according to the regulatory framework of risk retention and intends to distribute 44% of the remaining notes to the shareholders.
- Finally, the Board of Directors decided on 1.6.2020 the initiation of Alpha Bank's demerger by way of hive-down of the banking business sector and the incorporation of a new entity (hereinafter the "New Bank") in accordance with Article 16 of Law 2515/1997 and par. 3 of Article 57 of Law 4601/2019 and article 59 to 74 of Law 4601/2019.

  Pursuant to the Hive-Down, the banking business of Alpha Bank will be transferred to the New Bank, which will be licensed as a credit institution and shall be an 100% subsidiary of Alpha Bank. Alpha Bank will retain certain assets and liabilities, and pursue non-core banking activities but, upon the completion of the Hive-Down, will cease to be a credit institution, while its shares will remain listed on Main Market of the Athens Stock Exchange.

  Moreover, in accordance with the same resolution, the 30 June 2020 has been set as the Transformation Balance Sheet date of the Hive-Down. All actions to be taken by Alpha Bank after the Transformation Balance Sheet date, which are relevant to the banking business, are deemed to be taken for the benefit of the New Company. However, it is noted that the demerger will be accounted for following the completion of the Hive-Down.

  The rights of the Hellenic Financial Stability Fund will be retained and preserved in full after the completion of the Hive-Down.

  The completion of the Hive-Down is subject to the approvals of Alpha Bank's Board of Directors and General Meeting of Shareholders, as well as to all necessary approvals by the competent Authorities pursuant to applicable law.

  The draft demerger deed by way of hive-down with the incorporation of a new company was approved at the meeting of the Board of Directors on 15.9.2020.

49. Events after the balance sheet date

- From 10.1.2021, the Bank is fully part of the new infrastructure 24/7.365 of the Interbank European payment system SEPA, having successfully completed the necessary technical tests in cooperation with the National carrier for the settlement of Interbanking payments, DIAS S.A. Alpha Bank is the first to apply in all banking channels and with absolute security, the innovative service of direct payments for transactions within the Greek Territory.
- On 4.3.2021, the Bank completed the issuance of a Tier 2 bond, of nominal value of Euro 500 million. This subordinated debt has a maturity of 10.25 years with call option between 5 and 5.25 years, at a yield of 5,5%. The bond is traded in the stock exchange of Luxembourg – EuroMTF Market.
- On 12.3.2021, the Board of Directors of the Bank decided to convene the Extraordinary General Meeting on 2.4.2021, regarding the approval of the demerger of the Alpha Bank S.A. by way of hive-down of the banking business sector with the incorporation of a new company and the 15.9.2020 Demerger Deed, including the Transformation Balance Sheet from 30.6.2020.

Athens, 23 March 2021

THE CHAIRMAN OF THE BOARD OF DIRECTORS	THE CHIEF EXECUTIVE OFFICER	THE GENERAL MANAGER AND CHIEF FINANCIAL OFFICER	THE ACCOUNTING AND TAX MANAGER
VASILEIOS T. RAPANOS ID No AI 666242	VASSILIOS E. PSALTIS ID No AI 666591	LAZAROS A. PAPAGARYFALLOU ID No AK 093634	MARIANA D. ANTONIOU ID No X 694507

576 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Appendix

According to European Securities and Markets Authority (ESMA) guidelines in relation to not-defined under IFRS Alternative Performance Measures (APMs) which published in October 2015 and were applicable from 3 July 2016, on the following tables are disclosed the definitions and the calculations of the related (APMs) which are included in the Board of Directors' Annual Management Report as at 31.12.2020 and in the note "Disclosures of Law 4261/5.5.2014" of the Annual Report.

As described in the accounting policies applied section, the financial statements for the current period ending at 31.12.2020 have been prepared in accordance with International Financial Reporting Standards (IFRS), as adopted by the European Union, in accordance with Regulation 1606/2002 of the European Parliament and the Council of the European Union on 19 July 2002.

Alternative Performance Measures, include or exclude amounts which are not defined under IFRS, aiming at constistency and comparability among financial periods or years and provision of information regarding non recurring events. However, the not defined unser IFRS measures presented are not a substitute for IFRS measures.

(Amounts in millions of Euro)

Definition		Calculation			31.12.2020	31.12.2019
Loans to deposits ratio	The indicator reflects the relationship of loans and advances to customers with amounts due to customers	Numerator	+	Loans and advances to customers	39,380	39,266
		Denominator	+	Due to customers	43,831	40,364
		Ratio	=		**90%**	**97%**

(Amounts in millions of Euro)

Definition		Calculation		31.12.2020	31.12.2019
Net operating results	The balance illustrates the total income plus the share of profit/loss of associates and joint ventures minus the total expenses before impairment losses and provisions to cover credit risk	+	Total income	2,592.4	2,333.9
		+	Share of profit/(loss) of associates and joint ventures	(1.0)	(12.6)
		-	Total expenses before impairment losses and provisions to cover credit risk	1,157.8	1,174.7
				1,433.6	**1,146.6**

(Amounts in millions of Euro)

Definition		Calculation			2020	2019
Average total assets	The indicator reflects the calculation of average total assets	Numerator	+	Opening balance of total Assets of the year	63,458	61,007
		Numerator	+	Closing balance of total Assets of the year	70,057	63,458
		Denominator			2	2
		Ratio	=		**66,757**	**62,232**

(Amounts in millions of Euro)

Definition		Calculation			31.12.2020	31.12.2019
Return on Assets Ratio	The indicator reflects the relationship of profit/(losses) after income tax to average total assets	Numerator	+	Profit/(losses) after income tax	103.9	105.4
		Denominator	+	Average total assets	66,757	62,233
		Ratio	=		0.16%	**0.17%**

Finally, it is noted that in the context of the Annual Report for 2020, the calculation of loans to deposits ratio was modified, both for the current year and for the comparative one. In particular, contrary to the previous practice, the ratio will henceforth be calculated using the balance of loans and advances to customers, instead of balance of loans and advances to customers before allowance for impairment losses, with the aim of making this ratio comparable with the market.

Disclosures of Law 4374/2016

According to article 6 of Law 4374/1.4.2016 "Transparency among credit institutions, media companies and subsidized persons" introduced to all credit institutions established in Greece the obligation to publish annually and on consolidated basis:

a) All payments made within the year directly or indirectly to media company and its related parties, according to IAS 24, or communication and advertising company.

b) All payments made within the year due to donation, subsidy, grant or other grantis to individuals and legal entities.

The information required is presented below, in Euro:

PAYMENTS TO MEDIA COMPANIES (Article 6 Par.1 of L.4374/2016)	
Name*	**Amounts before taxes**
1984 PRODUCTIONS AE	19,097.60
24 MEDIA ΨΗΦΙΑΚΩΝ ΕΦΑΡΜΟΓΩΝ ΑΕ	57,649.00
ABP ΕΚΔΟΤΙΚΗ ΙΚΕ	9,326.00
ADWEB LTD ΕΤΑΙΡΕΙΑ ΠΕΡΙΟΡΙΣΜΕΝΗΣ ΕΥΘΥΝΗΣ	28,193.30
AIRLINK-ΕΛΛ/ΚΕΣ ΕΠΙΧ/ΣΕΙΣ ΕΚΔ.& ΟΠΤΙΚ/ΚΩΝ ΜΕΣΩΝ ΑΕ	20,707.08
ALPHA EDITIONS AE	3,720.00
ALPHA ΔΟΡΥΦΟΡΙΚΗ ΤΗΛΕΟΡΑΣΗ Α.Ε	184,761.07
ALPHA ΡΑΔΙΟΦΩΝΙΚΗ Α.Ε.	27,563.99
ANTENNA TV AE	295,959.75
ART SAVY MON. I.K.E.	7,500.00
ASM PUBLICATIONS PC	8,000.00
BANKINGNEWS AE	81,250.00
BETTERMEDIA IKE	6,000.00
CLOCKWORK ORANGE MINDTRAP LIMITED	13,780.00
CPAN CONNECT - ED PUPLIC AFFAIRS NETWORK LTD BANKWARSGR	13,800.00
D.G NEWSAGENCY ΑΝΩΝ.ΕΤΑΙΡ.ΗΛΕΚΤΡ.ΕΚΔΟΣΕΩΝ	22,630.40
DIMERA ΕΚΔΟΤΙΚΗ ΑΝΩΝΥΜΗ ΕΤΑΙΡΙΑ	62,548.25
DPG DIGITAL MEDIA ΜΟΝΟΠΡΟΣΩΠΗ Α.Ε.	45,975.00
ETHOS MEDIA AE	1,000.00
EUROMEDIA ACTION AE	2,000.00
EXIT BEE GREECE ΥΠΟΚΑΤΑΣΤΗΜΑ ΑΛΛΟΔΑΠΗΣ	8,600.00
FAROSNET A.E	21,022.44
FAST RIVER ΔΗΜ.ΚΕΙΜΕΝΟ CONCEPTI ΕΚΔ.ΕΠΕ	4,840.00
FINANCIAL PRESS IKE	600.00
FINANCIAL MARKETS VOICE AE ΕΦΗΜΕΡ FM VOICE	6,000.00
FORTHNET MEDIA AE	45,466.60
FREE SUNDAY ΕΚΔΟΤΙΚΗ ΑΝΩΝΥΜΗ ΕΤΑΙΡΙΑ & ΣΙΑ ΕΕ	7,500.00
FREED AE	14,786.00
FRONTSTAGE ΨΥΧΑΓΩΓΙΚΗ ΑΕ	27,249.37
GATEWORK A.E.	1,050.00
GLOBVY A.E.	14,129.00
GLOMAN AE	9,639.66
GM COMMUNICATION IKE	1,824.00
GRAFIMA ΔΙΑΦΗΜΙΣΤΙΚΗ Α.Ε.	4,000.00
HELLAS JOURNAL INC	9,425.00
HTTPOOL HELLAS M.IKE	64,560.36
ICAP AE	7,750.00
ICAP GROUP A.E.	750.00

* Names have not been translated into english.

579 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

INFINITAS I.K.E.	900.00
INSIDER PUBLICATIONS ΕΚΔΟΣΕΙΣ ΜΟΝ/ΠΗ ΕΠΕ	5,000.00
INTERNATIONAL RADIO NETWORKS AE DEE JAY	35,335.78
J.O INFOCENT ΕΠΙΚΟΙΝΩΝΙΕΣ ΜΟΝΟΠΡΟΣΩΠΗ ΕΠΕ	2,400.00
KISS AE ΜΕΣΑ ΜΑΖΙΚΗΣ ΕΝΗΜΕΡΩΣΗΣ	13,963.69
KONTRA IKE	3,000.00
KONTRA MEDIA ΜΕΣΑ ΜΑΖΙΚΗΣ ΕΝΗΜΕΡΩΣΗΣ Α.Ε.	15,044.40
KOOLWORKS M. A.E.	3,000.00
LIQUID MEDIA AE	44,206.00
LOVE RADIO BROADCASTING AE	10,764.99
M.V. PRESS ΜΟΝΟΠΡΟΣΩΠΗ ΙΚΕ ΕΚΔΟΣΕΙΣ	1,197.59
MEDIA DIVERSITY I.K.E.	350.00
MEDIA2DAY ΕΚΔΟΤΙΚΗ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ	104,897.96
MINDSUPPORT IKE	3,636.00
MINDTHEGAP MEDIA COMMUNICATIONS MON IKE	2,500.00
MONOCLE MEDIA LAB MONONEWS MIKE	73,319.45
NAG MEDIA A.E.	24,000.00
NEW MC ΚΑΙ ΣΙΑ Ε.Ε.	1,000.00
NEW MEDIA NETWORK SYNAPSIS S.A.	81,170.03
NEWPOST PRIVATE COMPANY	20,551.00
NEWSIT ΕΠΕ	85,929.05
NEWSROOM I.K.E.	1,000.00
NK MEDIA GROUP Ε.Π.Ε.	30,150.00
OLIVE MEDIA AE	16,955.90
OPINION POST ΗΛΕΚΤΡΟΝΙΚΕΣ ΕΚΔΟΣΕΙΣ ΑΕ	3,550.00
PARALOT MEDIA & MARKETING LIMITED	900.00
PERFECT MEDIA ADVERTISING MIKE	66,250.00
PHAISTOS NETWORKS AE	9,938.00
PLAN A MON IKE	4,500.00
PREMIUM A.E.	29,895.00
PRIME APPLICATIONS AE	48,535.58
PROJECT AGORA LTD	13,207.48
R MEDIA ΕΚΔΟΤΙΚΗ ΕΕ	1,500.00
RADIO PLAN BEE ΙΔΙΩΤΙΚΗ ΚΕΦΑΛΑΙΟΥΧΙΚΗ ΕΤΑΙΡΕΙΑ	1,700.20
REAL MEDIA A.E.	82,376.10
RED LEMON P.C	49,430.59
SABD ΕΚΔΟΤΙΚΗ Α.Ε.	84,279.46
SAMOS BUSINESS DEVELOPMENT IKE	9,050.00
SFERA RADIO ΑΝΩΝΥΜΟΣ ΡΑΔ/ΚΗ ΕΤΑΙΡΙΑ	14,060.02
SKIPPER ONDECK IKE	1,250.00
SOL DE GRECIA MONIKE	2,500.00
SOLAR ΡΑΔΙΟΤ/ΚΕΣ & ΨΥΧ/ΚΕΣ ΥΠΗΡΕΣΙΕΣ Α.Ε.	22,966.00
SPORT TV ΡΑΔΙΟΤΗΛΕΟΠΤΙΚΗ ΠΡΟΒΟΛΗ ΑΕ	28,943.60
SPORTNEWS ΥΠΗΡΕΣΙΕΣ ΔΙΑΔΙΚΤΙΟΥ Α.Ε	10,965.00
TELIA COMMUNICATIONS AE	8,280.00
THE TOC DIGITAL MEDIA ΥΠΗΡΕΣΙΕΣ ΕΝΗΜΕΡ.Α.Ε	21,949.60
U MEDIA ΕΞΕΙΔΙΚΕΥΜΕΝΕΣ ΔΙΑΦ. ΥΠΗΡΕΣΙΕΣ Ι.Κ.Ε.	36,207.94
USAY Σ.ΠΑΥΛΟΠΟΥΛΟΣ ΜΟΝ.ΕΠΕ	4,124.98
W.S.F. WALL STREET FINANCE I.K.E.	6,000.00
ΑΔΕΣΜΕΥΤΗ ΕΝΗΜΕΡΩΣΗ Ι.Κ.Ε.	2,001.68
ΑΘΕΝΣ ΒΟΙΣ ΑΝΩΝΥΜΗ ΕΚΔΟΤΙΚΗ ΕΤΑΙΡΕΙΑ	46,238.28
ΑΛΗΘΙΝΟ ΡΑΔΙΟΦΩΝΟ ΑΕ REAL FM	128,224.51
ΑΛΤΕΡ ΕΓΚΟ ΜΕΣΩΝ ΜΑΖΙΚΗΣ ΕΝΗΜΕΡΩΣΗΣ ΑΕ	631,202.99
ΑΝΑΣΤΑΣΙΟΣ ΚΑΡΑΜΗΤΣΟΣ & ΣΥΝΕΡΓΑΤΕΣ ΕΕ OLIVE MAGAZINE GR	8,880.00
ΑΝΕΞΑΡΤΗΤΑ ΜΕΣΑ ΜΑΖΙΚΗΣ ΕΝΗΜΕΡΩΣΗΣ ΑΕ	53,846.40
ΑΠΕ-ΜΠΕ ΑΕ	20,000.00

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580 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ΑΡΙΣΤΕΙΔΟΥ ΙΩΑΝ. ΛΥΔΙΑ - ΕΛΕΥΘΕΡΟ ΒΗΜΑ ΤΗΣ ΦΛΩΡΙΝΑΣ	290.00
ΑΡΧΑΙΟΛΟΓΙΑ ΚΑΙ ΤΕΧΝΕΣ	126.41
ΑΤΤΙΚΕΣ ΕΚΔΟΣΕΙΣ Α.Ε.	4,000.00
Β. ΒΟΓΙΑΤΖΗΣ & ΣΙΑ Ο.Ε.	285.80
ΒΑΣΙΛΟΠΟΥΛΟΣ Χ - ΠΕΤΡΟΠΟΥΛΟΣ Δ. ΟΕ (NEMA PROBLEMA)	9,551.00
ΒΛΑΧΑΚΗΣ ΝΕΚ.ΚΩΝΣΤΑΝΤΙΝΟΣ	800.00
ΒΟΡΕΙΑ ΕΝΗΜΕΡΩΤΙΚΗ ΑΕ	2,100.00
ΓΕΝΙΚΕΣ ΡΑΔΙΟΤΗΛΕΟΠΤΙΚΕΣ ΕΠΙΧ. ΑΕ	5,059.60
ΓΕΩΡΓΙΟΣ ΠΑΠΑΤΡΙΑΝΤΑΦΥΛΛΟΥ & ΣΙΑ ΕΕ	5,400.00
ΓΝΩΜΗ ΜΟΝΟΠΡΟΣΩΠΗ ΕΚΔΟΣΕΙΣ ΕΠΕ	160.00
Δ. ΜΠΟΥΡΑΣ & ΣΙΑ ΕΕ	26,000.00
ΔΑΦΝΗ ΕΠΙΚΟΙΝΩΝΙΕΣ ΑΕ	4,000.00
ΔΕΛΤΙΟΝ ΕΡΓΑΤΙΚΗΣ ΝΟΜΟΘΕΣΙΑΣ	212.26
ΔΕΣΜΗ ΑΕ ΕΜΠ.ΔΙΑΦ.ΡΑΔ.ΕΤΑΙΡΕΙΑ & ΕΦ.ΔΙΑΔΙΚΤΥΟΥ.	12,216.76
ΔΗΜ.ΡΟΥΧΩΤΑΣ & ΣΙΑ ΟΕ ΑΣΦΑΛΙΣΤΙΚΗ ΑΓΟΡΑ	283.02
ΔΗΜΗΤΡΙΟΣ ΑΛ ΑΡΑΜΠΑΤΖΗΣ ΣΕΡΡΑΪΚΟΝ ΘΑΡΡΟΣ	5,000.00
ΔΗΜΗΤΡΙΟΣ ΚΙΜ. ΠΑΠΑΓΙΑΝΝΟΠΟΥΛΟΣ - ΠΡΩΤΗ ΤΗΣ ΑΙΓΙΑΛΕΙΑΣ	690.00
ΔΗΜΟΣΙΟΓΡΑΦΙΚΟΣ ΟΡΓΑΝΙΣΜΟΣ ΒΑΡΟΥΞΗ Ι.Κ.Ε.	3,500.00
ΔΗΜΟΤΙΚΗ ΕΠΙΧ/ΣΗ ΤΗΛΕΟΡΑΣΗΣ Δ.ΑΣΠΡ/ΡΓΟΥ ATTICA TV	7,125.00
ΔΙΟΓΕΝΗΣ ΜΚΟ ΑΣΤΙΚΗ ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΗ ΕΤΑΙΡΕΙΑ	1,500.00
ΔΙΟΝΑΤΟΣ Ι. & ΣΙΑ Ε.Ε.	17,899.60
ΔΟΥΣΗΣ ΑΝΑΣΤΑΣΙΟΣ & ΣΙΑ ΕΕ - DOUSIES COM EE	25,907.00
ΔΥΑΔΙΚΗ ΕΝΗΜΕΡΩΣΗ ΕΕ	5,322.50
ΔΥΟ ΔΕΚΑ ΑΝΩΝ.ΕΚΔΟ.ΕΤΑΙΡΕΙΑ	46,795.00
ΕΘΝΙΚΟΣ ΚΗΡΥΞ ΤΗΣ ΝΕΑΣ ΥΟΡΚΗΣ ΕΛΛΑΣ ΜΟΝΟΠΡΟΣΩΠΗ ΕΠΕ	14,644.35
ΕΙΔ.ΛΟΓ/ΣΜΟΣ ΚΟΝΔ.ΕΡΕΥΝΑΣ ΤΟΥ ΕΘΝ.ΑΣΤΕΡ. ΑΘΗΝΩΝ	1,050.00
ΕΙΔΗΣΕΙΣ ΝΤΟΤ ΚΟΜ ΑΝΩΝ. ΤΗΛΕΟΠ/ΚΗ & ΕΜΠ.ΕΤ. ΠΑΡ.ΠΛ	286,129.67
ΕΚΔΟΣΕΙΣ 1908 ΙΚΕ	12,171.52
ΕΚΔΟΣΕΙΣ MOTORI Ε.Π.Ε.	4,500.00
ΕΚΔΟΣΕΙΣ ΑΠΟΣΤΟΛΟΥ ΕΛΕΝΗ	150.00
ΕΚΔΟΣΕΙΣ ΕΝΤΥΠΟΥ ΥΛΙΚΟΥ ΚΑΡΑΜΑΝΟΓΛΟΥ Ε.Π.Ε.	1,000.00
ΕΚΔΟΣΕΙΣ ΕΠΙΚΑΙΡΑ ΑΕ	1,500.00
ΕΚΔΟΣΕΙΣ Ν.ΠΑΠΑΝΙΚΟΛΑΟΥ ΑΕ	4,748.74
ΕΚΔΟΣΕΙΣ ΝΑΣΤΑ ΙΚΕ	1,200.00
ΕΚΔΟΣΕΙΣ ΝΕΟ ΧΡΗΜΑ ΑΕ NEWMONEY GR	36,000.00
ΕΚΔΟΣΕΙΣ ΠΕΔΙΟ ΑΕ	1,700.00
ΕΚΔΟΣΕΙΣ ΠΡΩΤΟ ΘΕΜΑ ΕΚΔΟΤΙΚΗ ΑΕ	497,651.94
ΕΚΔΟΣΕΙΣ ΣΟΦΙΑ ΜΟΣΧΑΝΔΡΕΟΥ & ΣΙΑ ΕΕ	4,706.09
ΕΚΔΟΣΕΙΣ ΣΤΑΜΟΥΛΗ ΑΕ	4,000.00
ΕΚΔΟΤΙΚΗ ΒΟΡΕΙΩΝ ΠΡΟΑΣΤΙΩΝ Μ. Ι.Κ.Ε.	1,500.00
ΕΚΔΟΤΙΚΗ ΤΡΙΠΟΛΕΩΣ ΒΑΣΙΛΕΙΟΣ ΗΛ. ΚΑΡΥΔΗΣ & ΣΙΑ ΟΕ	108.00
ΕΛΕΥΘΕΡΙΑ ΤΟΥ ΤΥΠΟΥ ΕΚΔΟΤΙΚΗ Α.Ε.	80,500.00
ΕΛΛΗΝΙΚΟ ΙΝΣΤΙΤΟΥΤΟ ΕΞΥΠΗΡΕΤΗΣΗΣ ΠΕΛΑΤΩΝ	400.00
ΕΝΙΚΟΣ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ	43,311.00
ΕΝΤΥΠΟΕΚΔΟΤΙΚΗ Α.Ε.Β.Ε.Τ.	5,800.00
ΕΞΕΡΕΥΝΗΤΗΣ-ΕΞΠΛΟΡΕΡ ΜΟΝΟΠΡΟΣΩΠΗ Α.Ε.Ε.Ε.	33,800.00
ΕΠΙΘΕΩΡΗΣΗ ΕΡΓΑΤΙΚΟΥ ΔΙΚΑΙΟΥ - ΠΑΝΑΓΙΩΤΗΣ ΓΑΛ. ΜΕΝΤΕΛΟΠΟΥΛΟΣ	504.73
ΕΠΙΘΕΩΡΗΣΗ ΕΡΓΑΤΙΚΟΥ ΔΙΚΑΙΟΥ - ΧΡΟΝΗΣ Π. ΤΣΙΜΠΟΥΚΗΣ	235.85
ΕΡΙΝΥΑ ΕΙΔΗΣΕΙΣ Μ ΙΚΕ	11,000.00
ΕΡΩΤΙΚΟΣ ΡΑΔΙΟ ΑΕ	1,529.64
ΕΣΤΙΑ ΕΠΕΝΔΥΤΙΚΗ ΜΜΕ ΑΕ	35,000.00
ΕΦΗΜΕΡΙΣ ΕΣΤΙΑ ΑΝΩΝΥΜΗ ΕΚΔΟΤΙΚΗ ΕΤΑΙΡΕΙΑ	50,832.19
ΖΟΥΓΚΛΑ ΤΖΙ ΑΡ ΑΕ	90,000.00
ΖΩΗ ΛΕΥΚΟΦΡΥΔΟΥ ΙΚΕ	290.32
Η ΑΥΓΗ ΑΕ	2,112.93
Η ΘΕΣΣΑΛΙΑ	249.81

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581 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Η ΚΑΘΗΜΕΡΙΝΗ Α.Ε.	3,861.60
Η ΝΑΥΤΕΜΠΟΡΙΚΗ - Π. ΑΘΑΝΑΣΙΑΔΗΣ & ΣΙΑ ΑΕ	40,801.42
ΗΛΙΑΣ ΚΑΝΕΛΛΗΣ & ΣΙΑ ΕΕ	1,800.00
HT PRESS ONLINE ΜΟΝΟΠΡΟΣΩΠΗ ΙΚΕ	11,000.00
ΗΧΟΣ ΚΑΙ ΡΥΘΜΟΣ ΑΕ	17,181.00
ΘΕΜΑ ΡΑΔΙΟ Α.Ε.	1,566.29
ΘΕΟΔΩΡΑ ΣΙΜΙΤΣΗ ΜΟΝΟΠΡΟΣΩΠΗ ΙΚΕ	3,000.00
ΘΕΟΧΑΡΗΣ ΣΠΥΡ.ΓΕΩΡΓΙΟΣ	6,499.23
Ι & Ε ΚΟΥΤΣΟΛΙΟΝΤΟΥ ΟΕ	3,000.00
Ι.ΤΟΜΕΛΙΤΟΥ - ΚΑΣΤΟΡΙΝΗ	1,556.60
ΙΚΑΡΟΣ ΡΑΔΙΟΤΗΛΕΟΠΤΙΚΕΣ ΕΠΙΧ/ΣΕΙΣ Α.Ε.	22,472.00
ΙΝΣΤΙΤΟΥΤΟ ΕΡΕΥΝΩΝ & ΜΕΛ. ΤΗΣ ΚΕΝΤ.ΕΝ.ΕΠΙΜ.ΕΛΛ/ΔΟΣ	4,000.00
ΙΟΝΙΑΝ ΡΑΔΙΟΤΗΛΕΟΠΤΙΚΕΣ ΕΠΙΧΕΙΡΗΣΕΙΣ ΑΕ	3,960.00
ΙΩΑΝΝΙΔΗΣ Α.ΝΙΚΟΛΑΟΣ	254.70
ΚΑΘΗΜΕΡΙΝΕΣ ΕΚΔΟΣΕΙΣ ΑΕ	397,129.32
ΚΑΛΟΠΟΥΛΟΥ ΓΕΩ.ΜΑΡΙΑ (WOMANIDOL)	1,800.00
ΚΑΠΙΤΑΛ.GR Α.Ε.	98,450.50
ΚΙΜΩΝ ΦΡΑΓΚΑΚΗΣ ΜΟΝΟΠΡΟΣΩΠΗ Ι.Κ.Ε. SOPHISTICATED	600.00
ΚΟΣΜΟΡΑΔΙΟ ΕΕ	800.00
ΚΩΝΣΤΑΝΤΑΚΟΣ ΑΝΤΩΝΙΟΣ ΜΟΝΟΠΡΟΣΩΠΗ ΙΚΕ	4,000.00
ΚΩΝΣΤΑΝΤΟΠΟΥΛΟΣ ΠΑΝΟΣ GRAMMA BOOKS	3,800.00
ΚΩΣΤΑΡΕΛΛΑΣ Ν. ΙΩΑΝΝΗΣ	328.00
ΛΑΜΨΗ ΕΚΔΟΤΙΚΕΣ & ΡΑΔ/ΚΕΣ ΕΠΙΧΕΙΡΗΣΕΙΣ Α.Ε.	17,355.04
ΛΥΚΑΒΗΤΟΣ ΕΚΔΟΣΕΙΣ ΜΟΝΟΠΡΟΣΩΠΗ Ι.Κ.Ε.	6,000.00
ΜΑΚΕΔΟΝΙΑ ΕΝΗΜΕΡΩΣΗ ΑΕ	7,000.00
ΜΑΚΕΔΟΝΙΑ TV ΑΕ	9,913.44
ΜΑΝΕΣΙΩΤΗΣ ΝΙΚ - ΨΩΜΙΑΔΗΣ ΚΩΝ ΟΕ FMVOICEGR	29,000.00
ΜΑΡΙΑ ΒΑΣΙΛΑΚΗ ΜΟΝΟΠΡΟΣΩΠΗ ΕΠΕ	8,000.00
ΜΑΡΙΝΑ Γ.ΤΟΥΛΑ & ΣΙΑ ΟΕ	1,200.00
ΜΕΤΡΟΝΤΗΛ ΜΟΝ. ΙΚΕ	285.60
ΜΙΧΑΛΗΣ ΦΑΝ.ΠΑΠΑΡΟΥΝΗΣ	250.00
ΜΠΟΥΣΙΑΣ ΕΠΙΚΟΙΝΩΝΙΕΣ ΕΠΕ	4,034.40
ΝΕΑ ΤΗΛΕΟΡΑΣΗ Α.Ε.	282,511.79
ΝΕΑ ΤΗΣ ΒΟΙΩΤΙΑΣ ΙΩΑΝΝΗΣ Η. ΚΑΝΤΑΣ	495.00
ΝΕΟ ΡΑΔΙΟΦΩΝΟ ΤΩΝ ΔΗΜΟΣΙΟΓΡΑΦΩΝ ΕΠΕ	50,781.62
ΝΕΟΤΥΠΟΓΡΑΦΙΚΗ ΜΟΝΟΠΡΟΣΩΠΗ ΕΠΕ Ο ΛΟΓΟΣ	12,590.02
ΝΙΚΟΛΑΟΣ ΣΤΑΣΙΝΟΣ & ΣΙΑ Ο.Ε.	1,200.00
ΝΟΗΣΙΣ ΙΚΕ	6,912.00
ΞΑΝΘΗΣ ΧΡΥΣΑΝΘΟΣ	400.00
ΞΑΝΘΟΠΟΥΛΟΣ - ΟΜΗΡΟΥ - ΕΥΑΓΓΕΛΟΠΟΥΛΟΣ Ο.Ε (KITCHEN	800.00
ΟΚΤΑΣ MEDIA ΙΚΕ	27,000.00
ΟΜΙΛΟΣ ΤΟΤΣΗ	169.82
ΟΡΓΑΝΙΣΜΟΣ ΜΕΣΩΝ ΜΑΖΙΚΗΣ ΕΠΙΚ/ΝΙΑΣ Α.Ε.	2,750.00
ΟΡΘΟΔΟΞΗ ΚΙΒΩΤΟΣ ΕΚΔΟΣΕΙΣ ΑΕ	2,500.00
ΟΡΙΖΟΝΤΕΣ ΕΠΕ	900.00
ΟΤΕ Α.Ε	47,868.05
Π. ΔΕΛΗΓΙΑΝΝΗΣ & ΣΙΑ Ε.Ε.	2,000.00
Π.Δ. ΕΚΔΟΣΕΙΣ ΕΠΕ	18,750.00
ΠΑΛΟ ΕΠΕ ΨΗΦΙΑΚΕΣ ΤΕΧΝΟΛΟΓΙΕΣ	9,889.00
ΠΑΝΑΓΙΩΤΗΣ Α. ΙΣΜΑΗΛΟΣ ΟΚΤΑΠΟΥΣ ΕΦΑΡΜΟΓΕΣ	1,500.00
ΠΑΠΑΛΙΟΣ ΚΩΝΣΤΑΝΤΙΝΟΣ & ΣΙΑ ΕΕ DIRECTION BNETW	2,175.86
ΠΑΠΟΥΛΙΔΗΣ ΘΕΟΔΩΡΟΣ Μ.ΙΚΕ	6,480.66
ΠΑΡΑΕΝΑ Μ. ΕΠΕ	114,006.13
ΠΑΡΑΠΟΛΙΤΙΚΑ ΕΚΔΟΣΕΙΣ ΑΕ	56,800.15
ΠΕΛΟΠΟΝΝΗΣΟΣ ΠΑΤΡΩΝ ΕΚΔΟΣΕΙΣ ΑΕ	12,080.00
ΠΕΡΙΟΔΙΚΟ BEAUTE ΙΚΕ	2,000.00

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582 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ΠΡΟΤΑΓΚΟΝ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ	20,326.00
ΠΡΩΙΝΟΣ ΤΥΠΟΣ - ΣΤΕΛΛΑ Ι. ΣΤΑΥΡΙΔΟΥ	217.32
Ρ.Η.Ε.Μ.Ε.Α.Ε Ρ/Τ ΗΛΕΚΡΟΝ. ΕΚΔΟΤΙΚΑ ΜΕΣΑ ΕΛΛ. Α.Ε	2,500.00
ΡΑΔΙΟ ΘΕΣΣΑΛΟΝΙΚΗ ΑΕ	8,097.05
ΡΑΔΙΟΤΗΛΕΟΠΤΙΚΕΣ ΕΠΙΧΕΙΡΗΣΕΙΣ ΑΕ	6,588.90
ΡΑΔΙΟΤΗΛΕΟΠΤΙΚΗ Α.Ε.	98,872.80
ΡΑΔΙΟΦΩΝΙΚΕΣ ΕΠΙΧΕΙΡΗΣΕΙΣ RADIO NORTH 98FM ΜΟΝ. ΕΠΕ	10,855.86
ΡΑΔΙΟΦΩΝΙΚΕΣ ΠΑΡΑΓΩΓΕΣ Α.Ε.	12,184.00
ΡΑΔΙΟΦΩΝΙΚΗ ΕΠΙΚΟΙΝΩΝΙΑ ΑΕ ΔΙΕΣΗ FM	4,208.24
ΣΑΡΙΣΑ ΜΟΝΟΠΡΟΣΩΠΗ ΕΠΕ	1,500.00
ΣΕΛΑΝΑ Α.Ε	6,000.00
ΣΕΡΡΑΙΚΕΣ ΕΚΔΟΣΕΙΣ ΜΟΝΟΠΡΟΣΩΠΗ Ε.Π.Ε.	315.00
ΣΙΜΟΥΣΙ ΕΕ	2,987.50
ΣΤΑΜΑΤΗ ΧΑΡΙΚΛΕΙΑ - ΒΟΙΩΤΙΚΑ ΝΕΑ	390.00
ΣΥΓΧΡΟΝΗ ΕΠΟΧΗ - ΕΚΔΟΤΙΚΗ ΑΕΒΕ ΡΙΖΟΣΠΑΣΤΗΣ	193.56
ΤΟ ΚΟΥΤΙ ΤΗΣ ΠΑΝΔΩΡΑΣ MEDIA ΕΕ	1,000.00
ΤΟΠΙΚΕΣ ΕΦΗΜΕΡΙΔΕΣ Ι.Κ.Ε.	150.00
ΤΣΙΤΑΣ Χ. ΠΡΟΔΡΟΜΟΣ	900.00
ΤΥΠΟΚΥΚΛΑΔΙΚΗ ΑΕ	149.27
ΤΥΠΟΣ ΘΕΣΣΑΛΟΝΙΚΗΣ TYPOS MEDIA ΕΠΕ	4,496.25
ΤΥΠΟΣ ΧΑΛΚΙΔΙΚΗΣ ΘΩΜΑ ΘΕΟΔΩΡΑ	202.50
ΦΕΛΝΙΚΟΣ ΗΛΕΚΤΡ. ΜΕΣΩΝ ΕΝΗΜΕΡΩΣΗΣ Μ.ΕΠΕ	9,848.00
ΦΙΛΑΘΛΟΣ ΙΚΕ	9,000.00
ΦΙΛΕΛΕΥΘΕΡΟΣ ΕΚΔΟΤΙΚΗ Α.Ε.	18,880.00
ΦΙΛΕΛΕΥΘΕΡΟΣ ΤΥΠΟΣ ΜΟΝ .Α.Ε.	52,284.79
ΦΟΞ ΝΕΤΓΟΥΟΡΚΣ ΓΚΡΟΥΠ ΕΛΛΑΣ ΑΕ	2,996.00
ΦΩΤΑΓΩΓΟΣ ΕΠΕ	3,800.00
ΦΩΤΙΟΣ ΡΑΙΣΗΣ ΚΑΙ ΣΙΑ ΕΕ Ο ΗΜΕΡΗΣΙΟΣ ΔΗΜΟΤΗΣ	260.00
Χ ΘΕΟΦΡΑΣΤΟΥ ΤΗΛΕΟΠΤΙΚΕΣ ΠΑΡΑΓΩΓΕΣ ΙΚΕ	24,000.00
ΧΡΥΣΗ ΕΥΚΑΙΡΙΑ Α.Ε.	1,100.00
	6,283,992.13

PAYMENTS TO MEDIA COMPANIES OF AMOUNTS LESS THAN €100 PER MEDIA COMPANY
Name*
LOCAL NEWS ΔΗΜΗΤΡΙΟΣ Κ. ΤΟΛΗΣ ΜΟΝΟΠΡΟΣΩΠΗ ΙΚΕ
ΑΣΗΜΕΝΙΑ Ν. ΖΗΣΙΜΟΥ
ΕΛΕΥΘΕΡΙΑ ΑΕ
ΕΛΝΑΒΙ ΙΚΕ
ΜΠΟΥΘΑΣ ΚΩΝΣΤΑΝΤΙΝΟΣ ΤΟΥ ΠΕΤΡΟΥ ΗΜΕΡΗΣΙΑ ΒΕΡΟΙΑΣ
ΝΑΥΤΙΚΑ ΧΡΟΝΙΚΑ GRATIA ΕΚΔΟΤΙΚΗ ΙΚΕ

The above table refers to Media Companies of amounts less than € 100, with total amount equal to € 367.70.

TOTAL FOR MEDIA PAYMENTS	**6,284,359.83**

	Amounts
TELEVISION TAX PAYMENTS	43,279.28
DIGITAL TAX PAYMENTS 2%	22,922.94
SPECIAL FEE PAYMENTS 0,02%	1,560.20
MUNICIPAL FEE PAYMENTS 2%	6,374.14

* Names have not been translated into english.

583 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

PAYMENTS DUE TO DONATIONS, SPONSORSHIP, SUBSIDIES OR OTHER CHARITABLE REASONS (Article 6 Par. 2 of L.4374/2016)	
A) TO LEGAL ENTITIES	
Name*	**Amounts before taxes**
2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΣΑΜΟΥ	1,192.00
6η ΥΠΕ ΠΕΛΟΠΟΝΝΗΣΟΥ ΙΟΝΙΩΝ ΝΗΣΩΝ ΗΠΕΙΡΟΥ ΚΑΙ ΔΥΤΙΚΗΣ ΕΛΛΑΔΟΣ	18,600.00
6ΘΕΣΙΟ ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΔΙΚΑΙΩΝ ΔΗΜΟΥ ΟΡΕΣΤΙΑΔΑΣ Ν.ΕΒΡΟΥ	2,016.13
7ο ΓΥΜΝΑΣΙΟ ΚΟΡΥΔΑΛΛΟΥ	1,250.00
AGNA LEADERSHIP ACADEMY - ON TIME CONCEPT	2,401.94
ASOCIATIA PARINTILOR SI TUTORILOR GRECI DIN BUCURESTI	4,928.74
ASOCIATIA PENTRU CERCETAREA, DEZVOLTAREA SI IMPLEMENTAREA TEHNOLOGIILOR ÎN CONSTRUCTII BIMTECH	492.83
ASOCIATIA PENTRU PROMOVAREA PERFORMANTEI IN EDUCATIE	7,997.23
ASOCIATIA ROMANA A BANCILOR	8,026.53
ASOCIATIA SOCIETATEA PENTRU MUZICA CLASICA	1,000.00
ASOCIATIA TRIADA	4,107.28
CAMERA DE COMERT SI INDUSTRIE ELENO-ROMANA	1,500.00
CAPITAL LINK INC	10,000.00
COLENTINA CLINICAL HOSPITAL	35,778.61
CYCLOPOLIS IKE	15,000.00
CYPRUS FIDUCIARY ASSOCIATION	7,000.00
DIBER HOSPITAL	727.57
DOWN SYNDROME ALBANIA	2,005.01
EBEN GR ΕΛΛΗΝΙΚΟ ΙΝΣΤΙΤΟΥΤΟ ΕΠΙΧΕΙΡΗΜΑΤΙΚΗΣ ΗΘΙΚΗΣ	1,000.00
EIMN LLC	18,000.00
ELIAS UNIVERSITY EMERGENCY HOSPITAL	64,746.80
EMBASSY OF GREEECE IN ALBANIA	5,645.65
ETHOS MEDIA ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ ΕΚΔΟΤΙΚΗ ΣΥΝΕΔΡΙΑΚΗ	11,000.00
EUROPA DONNA ΚΥΠΡΟΥ	2,500.00
EXPONENTIAL IMPACT AMKE	80,000.00
ΕΘΝΙΚΗ ΠΙΝΑΚΟΘΗΚΗ- ΜΟΥΣΕΙΟ ΑΛΕΞΑΝΔΡΟΥ ΣΟΥΤΣΟΥ	42,000.00
GALLERY 70	1,000.40
GEOROUTES ΙΝΣΤΙΤΟΥΤΟ ΠΟΛΙΤΙΣΤΙΚΩΝ ΠΕΡΙΒΑΛΛΟΝΤΙΚΩΝ ΚΑΙ ΤΟΥΡΙΣΤΙΚΩΝ ΔΙΑΔΡΟΜΩΝ	2,000.00
GLOBAL SUSTAIN A.E.	1,500.00
GREEK BLESSING DONATION	109.60
ΙΜΗ ΣΥΝΕΔΡΙΟ - 10TH NICOSIA ECONOMIC CONGRESS	8,000.00
JONATHAN CENTRE	2,220.70
KONTRIBUTE VULLNETARE EMERGJENCA ALPHA BANK ALBANIA	15,000.00
P & J VERITAS IKE	6,000.00
PALLADIAN COMUNICATION SPECIALISTS	1,000.00
POGRADEC MUNICIPALITY	1,692.87
RED CROSS ALBANIA	4,021.23
S.S.A. SOLDOUT LTD	540.00
SAFE WATER SPORTS ΝΠΙΔ ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΟ ΣΩΜΑΤΕΙΟ	37,000.00
SAFER INTERNET HELLAS AMKE	1,000.00
SOLIDARITY NOW ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΟ ΣΩΜΑΤΕΙΟ	5,000.00
ST. DEMETRIOS & ST. NIKITAS CHURCH	111.23
TAF (THE ART FOUNDATION)	600.00
THE AMERICAN COLLEGE OF GREECE	4,000.00
THE TIPPING POINT	10,000.00
THE TWELVE APOSTLES CHURCH	219.19
WORLD VISION ALBANIA	6,106.16
ΑΓΟΡΑ ΜΑΣΚΩΝ ΚΑΤΑ ΤΟΥ COVID-19 ΓΙΑΤΡΟΙ ΤΟΥ ΚΟΣΜΟΥ / ΜΗΤΡΟΠΟΛΗ ΠΕΙΡΑΙΑ	4,000.00
ΑΘΗΝΑΪΚΗ ΞΕΝΟΔΟΧΕΙΑΚΗ ΑΕ ΞΕΝΟΔΟΧΕΙΟ ΑΜΑΛΙΑ ΑΘΗΝΩΝ	3,500.00
ΑΝΘΡΩΠΙΣΤΙΚΗ ΑΠΟΣΤΟΛΗ ΥΠΕΞ ΣΤΟ ΛΙΒΑΝΟ	5,390.00
ΑΝΝΑ ΚΟΡΑΚΑΚΗ ΙΚΕ ΥΠΗΡΕΣΙΕΣ ΑΘΛΗΤΩΝ	30,000.00
ΑΝΤΙΚΑΡΚΙΝΙΚΟΣ ΣΥΝΔΕΣΜΟΣ ΚΥΠΡΟΥ	300.00

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584 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ΑΝΩΤΑΤΗ ΣΧΟΛΗ ΚΑΛΩΝ ΤΕΧΝΩΝ	2,387.31
ΑΣΥΛΟ ΤΟΥ ΠΑΙΔΙΟΥ	300.00
ΑΤΤΙΚΟΣ ΟΜΙΛΟΣ ΑΝΤΙΣΦΑΙΡΙΣΗΣ	2,480.00
ΒΑΓΟΝΙ ΑΓΑΠΗΣ	1,000.00
ΒΕΡΤΙΚΑΛ ΣΟΛΟΥΣΙΟΝΣ ΑΕ	10,000.00
Γ.Ν.Ν.Θ.Α. Η ΣΩΤΗΡΙΑ	83,000.00
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΑΓΙΟΣ ΔΗΜΗΤΡΙΟΣ / Γ. ΓΕΝΝΗΜΑΤΑΣ	4,000.00
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΑΘΗΝΩΝ Γ.ΓΕΝΝΗΜΑΤΑΣ	2,603.17
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΛΕΥΚΩΣΙΑΣ	50,000.00
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΝΟΣΗΜΑΤΩΝ ΘΩΡΑΚΟΣ ΑΘΗΝΩΝ Η ΣΩΤΗΡΙΑ	224,380.13
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΠΑΙΔΩΝ ΠΑΤΡΩΝ ΚΑΡΑΜΑΝΔΑΝΕΙΟ	10,394.00
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΠΑΙΔΩΝ ΠΕΝΤΕΛΗΣ	4,876.00
ΓΕΩΠΟΝΙΚΟ ΠΑΝΕΠΙΣΤΗΜΙΟ ΑΘΗΝΩΝ	500.00
ΓΙΑΤΡΟΙ ΤΟΥ ΚΟΣΜΟΥ	4,273.92
ΔΗΜΟΣ ΔΙΣΤΟΜΟΥ - ΑΡΑΧΩΒΑΣ - ΑΝΤΙΚΥΡΑΣ	900.00
ΔΗΜΟΣ ΝΑΥΠΛΙΕΩΝ	1,338.18
ΔΗΜΟΣ ΣΑΛΑΜΙΝΟΣ Α.ΚΟΙ.ΠΟΠ.	200.00
ΔΙΕΘΝΕΣ ΙΝΣΤΙΤΟΥΤΟ ΓΙΑ ΤΗΝ ΚΥΒΕΡΝΟΑΣΦΑΛΕΙΑ ΣΩΜΑΤΕΙΟ	12,000.00
ΔΙΕΘΝΗΣ ΑΜΝΗΣΤΙΑ	4,830.06
ΔΙΕΠΑΓΓΕΛΜΑΤΙΚΗ ΟΡΓΑΝΩΣΗ ΒΑΜΒΑΚΟΣ	2,000.00
ΔΙΕΥΘΥΝΣΗ ΔΗΜΟΤΙΚΗΣ ΑΣΤΥΝΟΜΙΑΣ	175.00
ΕΘΝΙΚΗ ΛΥΡΙΚΗ ΣΚΗΝΗ	150,000.00
ΕΘΝΙΚΟ ΚΑΠΟΔΙΣΤΡΙΑΚΟ ΠΑΝΕΠΙΣΤΗΜΙΟ ΑΘΗΝΩΝ	13,904.41
ΕΘΝΙΚΟ ΝΗΠΙΟΤΡΟΦΕΙΟ ΚΑΛΛΙΘΕΑΣ	470.75
ΕΙΔΙΚΗ ΕΚΔΟΣΗ ΚΑΘΗΜΕΡΙΝΗΣ 'ΑΜΜΟΧΩΣΤΟΣ'	3,000.00
ΕΙΔΙΚΟ ΣΧΟΛΕΙΟ ΚΩΦΩΝ ΚΑΙ ΒΑΡΥΚΟΩΝ ΑΡΓΥΡΟΥΠΟΛΗΣ	167.50
ΕΛΕΠΑΠ	3,000.00
ΕΛΚΕ ΠΑΝΕΠΙΣΤΗΜΙΟ ΔΥΤΙΚΗΣ ΑΤΤΙΚΗΣ	40,000.00
ΕΛΚΕ ΠΑΝΕΠΙΣΤΗΜΙΟΥ ΠΑΤΡΩΝ	4,000.00
ΕΛΛΗΝΙΚΑ ΧΡΗΜΑΤΙΣΤΗΡΙΑ - ΧΡΗΜΑΤΙΣΤΗΡΙΟ ΑΘΗΝΩΝ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ ΣΥΜΜΕΤΟΧΩΝ ATHEX	34,300.00
ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ ΥΠΟΥΡΓΕΙΟ ΕΣΩΤΕΡΙΚΩΝ κ' ΔΙΟΙΚΗΤΙΚΗΣ ΑΝΑΣΥΓΚΡΟΤΗΣΗΣ ΑΡΧΗΓΕΙΟ ΕΛΛΗΝΙΚΗΣ ΑΣΤΥΝΟΜΙΑΣ	26,011.88
ΕΛΛΗΝΙΚΗ ΕΝΩΣΗ ΤΡΑΠΕΖΩΝ	12,191.00
ΕΛΛΗΝΙΚΗ ΕΤΑΙΡΙΑ ΠΕΡΙΒΑΛΛΟΝΤΟΣ ΚΑΙ ΠΟΛΙΤΙΣΜΟΥ	30,000.00
ΕΛΛΗΝΙΚΗ ΣΧΟΛΗ ΣΚΥΛΩΝ ΟΔΗΓΩΝ ΛΑΡΑ	7,500.00
ΕΛΛΗΝΙΚΟΣ ΣΥΝΔΕΣΜΟΣ ΗΛΕΚΤΡΟΝΙΚΟΥ ΕΜΠΟΡΙΟΥ ΕΣΗΕ	12,000.00
ΕΛΛΗΝΟΑΜΕΡΙΚΑΝΙΚΟ ΕΜΠΟΡΙΚΟ ΕΠΙΜΕΛΗΤΗΡΙΟ	6,000.00
ΕΛΛΗΝΟΓΑΛΛΙΚΗ ΣΧΟΛΗ ΟΥΡΣΟΥΛΙΝΩΝ	600.00
ΕΛΛΗΝΟΓΕΡΜΑΝΙΚΟ ΕΜΠΟΡΙΚΟ ΚΑΙ ΒΙΟΜΗΧΑΝΙΚΟ ΕΠΙΜΕΛΗΤΗΡΙΟ	27,000.00
ΕΜΠΟΡΙΚΟΣ ΕΙΣΑΓΩΓΙΚΟΣ ΣΥΛΛΟΓΟΣ ΠΑΤΡΩΝ	800.00
ΕΝΕΡΓΕΙΑΚΗ ΚΑΜΠΟΥ ΔΗΜΟΥ ΚΑΡΔΙΤΣΑΣ	3,500.00
ΕΝΩΣΗ ΑΣΤΥΝΟΜΙΚΩΝ ΥΠΑΛΛΗΛΩΝ ΦΘΙΩΤΙΔΑΣ	977.48
ΕΝΩΣΗ ΑΣΤΥΝΟΜΙΚΩΝ ΥΠΑΛΛΗΛΩΝ ΦΩΚΙΔΟΣ	2,000.00
ΕΝΩΣΗ ΔΙΠΛΩΜΑΤΟΥΧΩΝ ΞΕΝΑΓΩΝ ΙΟΝΙΩΝ ΝΗΣΩΝ ΚΑΙ ΔΥΤΙΚΗΣ ΕΛΛΑΔΑΣ	300.00
ΕΝΩΣΗ ΚΥΠΡΙΩΝ ΣΥΝΤΑΞΙΟΥΧΩΝ "Ε.ΚΥ.ΣΥ"	100.00
ΕΡΕΥΝΗΤΙΚΟ ΚΕΝΤΡΟ ΣΤΡΑΤΗΓΙΚΗΣ ΔΙΟΙΚΗΣΗΣ ΕΠΙΧΕΙΡΗΣΕΩΝ ΚΑΙ ΕΠΙΧΕΙΡΗΜΑΤΙΚΟΤΗΤΑΣ ΝΠΙΔ ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΟ	3,000.00
ΕΣΤΙΑ ΑΓΙΟΣ ΝΙΚΟΛΑΟΣ	3,000.00
ΕΤΑΙΡΙΑ ΑΡΧΙΠΕΛΑΓΟΣ ΑΣΤΙΚΗ ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΗ	20,000.00
ΕΤΑΙΡΙΑ ΜΑΚΕΔΟΝΙΚΩΝ ΣΠΟΥΔΩΝ	4,000.00
ΕΤΑΙΡΙΑ ΠΡΟΣΤΑΣΙΑΣ ΣΠΑΣΤΙΚΩΝ	3,800.00
ΕΥΡΩΠΑΪΚΟ ΠΑΝΕΠΙΣΤΗΜΙΟ ΚΥΠΡΟΥ	10,000.00
Η ΕΝ ΑΘΗΝΑΙΣ ΦΙΛΕΚΠΑΙΔΕΥΤΙΚΗ ΕΤΑΙΡΕΙΑ ΑΡΣΑΚΕΙΑ ΤΟΣΙΤΣΕΙΑ ΣΧΟΛΕΙΑ	6,000.00
Η ΚΙΒΩΤΟΣ ΤΟΥ ΚΟΣΜΟΥ	1,400.00
ΙΔΡΥΜΑ ΕΥΣΤΑΘΙΑΣ Ι. ΚΩΣΤΟΠΟΥΛΟΥ	200,000.00
ΙΔΡΥΜΑ Ι.Φ. ΚΩΣΤΟΠΟΥΛΟΥ	150.00
ΙΔΡΥΜΑ ΜΟΥΣΕΙΟΥ ΜΑΚΕΔΟΝΙΚΟΥ ΑΓΩΝΑ	7,000.00

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585 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

ΙΔΡΥΜΑ ΥΠΟΤΡΟΦΙΩΝ ΑΝΩΤΑΤΩΝ ΣΠΟΥΔΩΝ ΛΑΡΝΑΚΑΣ	300.00
ΙΕΡΑ ΜΟΝΗ ΖΩΟΔΟΧΟΥ ΠΗΓΗΣ ΜΠΑΤΣΙ ΑΝΔΡΟΥ	395.16
ΙΕΡΟΣ ΝΑΟΣ ΑΓΙΟΥ ΓΕΩΡΓΙΟΥ ΑΓΛΑΝΤΖΙΑΣ	500.00
ΙΝΣΤΙΤΟΥΤΟ PROLEPSIS ΠΡΟΛΗΨΙΣ ΑΣΤΙΚΗ ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΗ ΕΤΑΙΡΕΙΑ	3,000.00
ΚΑΝΕ ΜΙΑ ΕΥΧΗ ΕΛΛΑΔΟΣ ΑΜΚΕ	5,600.00
ΚΑΠΙΤΑΛ ΛΙΝΚ ΕΛΛΑΣ ΜΟΝ ΕΠΕ	5,000.00
ΚΕΝΤΡΟ ΕΚΠΑΙΔΕΥΤΙΚΗΣ ΡΟΜΠΟΤΙΚΗΣ ΚΑΙ ΕΠΙΣΤΗΜΩΝ ΚΡΗΤΗΣ	491.82
ΚΕΝΤΡΟ ΕΝΗΜΕΡΩΣΗΣ ΚΑΙ ΘΕΡΑΠΕΙΑΣ ΕΞΑΡΤΗΜΕΝΩΝ ΑΤΟΜΩΝ "ΚΕΝΘΕΑ"	200.00
ΚΕΝΤΡΟ ΕΡΕΥΝΩΝ ΠΑΝΕΠΙΣΤΗΜΙΟΥ ΠΕΙΡΑΙΩΣ	3,000.00
ΚΕΠ ΦΙΛΟΘΕΗΣ	1,102.48
ΚΟΙΝΩΝΙΚΗ ΜΕΡΙΜΝΑ ΑΓΙΩΝ ΟΜΟΛΟΓΗΤΩΝ	1,500.00
ΚΟΙΝΩΝΙΚΟ ΠΑΝΤΟΠΩΛΕΙΟ ΔΗΜΟΥ ΚΑΡΔΙΤΣΑΣ	1,250.18
ΚΟΙΝΩΦΕΛΗΣ ΕΠΙΧΕΙΡΗΣΗ ΔΗΜΟΥ ΚΑΛΑΜΑΤΑΣ ΦΑΡΙΣ	10,000.00
ΚΟΙΝΩΦΕΛΗΣ ΕΠΙΧΕΙΡΗΣΗ ΔΗΜΟΥ ΥΔΡΑΣ	800.00
ΚΥΠΡΙΑΚΟΣ ΕΡΥΘΡΟΣ ΣΤΑΥΡΟΣ	300.00
ΛΑΪΚΟ ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΑΘΗΝΩΝ	59,200.00
ΛΥΚΕΙΟ ΑΚΡΟΠΟΛΕΩΣ	200.00
ΛΥΚΕΙΟ ΕΘΝΟΜΑΡΤΥΡΑ ΚΥΠΡΙΑΝΟΥ	200.00
ΜΑΖΙ ΓΙΑ ΤΟ ΠΑΙΔΙ	400.00
ΜΑΡΓΑΡΙΤΑ-ΕΡΓΑΣΤΗΡΙ ΕΙΔΙΚΗΣ ΑΓΩΓΗΣ	400.00
ΜΕΛΑΘΡΟΝ ΑΓΩΝΙΣΤΩΝ ΤΗΣ ΕΟΚΑ	400.00
ΜΟΡΦΩΤΙΚΟ ΙΔΡΥΜΑ ΕΝΩΣΗΣ ΣΥΝΤΑΚΤΩΝ ΗΜΕΡΗΣΙΩΝ ΕΦΗΜΕΡΙΔΩΝ ΜΑΚΕΔΟΝΙΑΣ -ΘΡΑΚΗΣ	1,500.00
ΜΟΥΣΕΙΟ ΓΟΥΛΑΝΔΡΗ ΦΥΣΙΚΗΣ ΙΣΤΟΡΙΑΣ	10,000.00
ΜΟΥΣΕΙΟ ΜΠΕΝΑΚΗ	48,360.00
ΜΟΥΣΙΚΟΣ ΠΟΛΙΤΙΣΤΙΚΟΣ ΣΥΛΛΟΓΟΣ ΟΙ ΦΙΛΟΙ ΤΗΣ ΧΟΡΩΔΙΑΚΗΣ ΜΟΥΣΙΚΗΣ	10,000.00
ΝΟΜΙΚΗ ΒΙΒΛΙΟΘΗΚΗ ΑΕΕΤΕ	3,000.00
ΟΙΚΟΝΟΜΙΚΟ ΣΥΝΕΔΡΙΟ ΔΕΛΦΩΝ ΑΜΚΕ	7,200.00
ΟΜΙΛΟΣ ΓΙΑ ΤΗΝ UNESCO ΠΕΙΡΑΙΩΣ ΚΑΙ ΝΗΣΩΝ	810.56
ΟΡΓΑΝΙΣΜΟΣ ΜΕΓΑΡΟΥ ΜΟΥΣΙΚΗΣ ΘΕΣΣΑΛΟΝΙΚΗΣ	25,000.00
ΟΦΘΑΛΜΙΑΤΡΕΙΟ ΑΘΗΝΩΝ	977.11
Π.Γ.Ν.Θ. ΑΧΕΠΑ	99,990.00
ΠΑΓΚΥΠΡΙΑ ΟΡΓΑΝΩΣΗ ΑΠΟΚΑΣΤΑΣΗΣ ΑΝΑΠΗΡΩΝ ΛΕΜΕΣΟΥ	200.00
ΠΑΓΚΥΠΡΙΟ ΣΥΝΤΟΝΙΣΤΙΚΟ ΣΥΜΒΟΥΛΙΟ ΕΘΕΛΟΝΤΙΣΜΟΥ (ΠΣΣΕ)	1,500.00
ΠΑΓΚΥΠΡΙΟΣ ΣΥΝΔΕΣΜΟΣ ΓΙΑ ΚΑΤΑΠΟΛΕΜΗΣΗ ΤΗΣ ΜΑΣΤΙΓΑΣ ΤΗΣ ΠΕΙΝΑΣ	500.00
ΠΑΓΚΥΠΡΙΟΣ ΣΥΝΔΕΣΜΟΣ 'ΕΝΑ ΟΝΕΙΡΟ ΜΙΑ ΕΥΧΗ'	1,500.00
ΠΑΓΚΥΠΡΙΟΣ ΣΥΝΔΕΣΜΟΣ ΚΑΡΚΙΝΟΠΑΘΩΝ ΚΑΙ ΦΙΛΩΝ	400.00
ΠΑΓΚΥΠΡΙΟΣ ΣΥΝΔΕΣΜΟΣ ΦΙΛΩΝ ΝΕΦΡΟΠΑΘΩΝ	4,500.00
ΠΑΙΔΙΚΗ ΕΞΟΧΗ ΛΑΡΝΑΚΑΣ	200.00
ΠΑΝΕΠΙΣΤΗΜΙΑΚΟ ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΑΛΕΞΑΝΔΡΟΥΠΟΛΗΣ	27,621.24
ΠΑΝΕΠΙΣΤΗΜΙΑΚΟ ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΙΩΑΝΝΙΝΩΝ	168.00
ΠΑΝΕΠΙΣΤΗΜΙΑΚΟ ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΛΑΡΙΣΗΣ	172,762.61
ΠΑΝΕΠΙΣΤΗΜΙΑΚΟ ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΛΑΡΙΣΗΣ - ΚΟΥΤΛΙΜΠΑΝΕΙΟ ΚΑΙ ΤΡΙΑΝΤΑΦΥΛΛΕΙΟ	16,065.16
ΠΑΝΕΠΙΣΤΗΜΙΟ ΚΥΠΡΟΥ	1,000.00
ΠΑΡΑΡΤΗΜΑ ΑΠΟΘΕΡΑΠΕΙΑΣ ΚΑΙ ΑΠΟΚΑΤΑΣΤΑΣΗΣ ΠΑΙΔΙΩΝ ΜΕ ΑΝΑΠΗΡΙΑ ΒΟΥΛΑΣ ΠΑΑΠΑΒ ΠΡΩΗΝ ΠΙΚΠΑ ΒΟΥΛΑΣ	1,504.50
ΠΕΙΡΑΪΚΗ ΕΝΩΣΗ ΓΟΝΕΩΝ ΚΗΔΕΜΟΝΩΝ ΚΑΙ ΦΙΛΩΝ ΑΜΕΑ	310.00
ΠΟΛΙΤΙΣΤΙΚΟ ΙΔΡΥΜΑ ΙΟΝΙΚΗΣ ΤΡΑΠΕΖΗΣ	15,000.00
ΠΡΟΓΡΑΜΜΑ ΚΟΙΝΩΝΙΚΗΣ ΠΡΟΣΦΟΡΑΣ	30,860.00
ΠΡΟΓΡΑΜΜΑ ΜΑΖΙ ΜΕ ΣΤΟΧΟ ΤΗΝ ΠΑΙΔΙΑ	75,000.00
ΠΡΟΓΡΑΜΜΑ ΜΑΖΙ ΜΕ ΣΤΟΧΟ ΤΗΝ ΥΓΕΙΑ	213,758.15
ΠΡΟΓΡΑΜΜΑ ΟΙ ΦΘΟΡΕΣ ΠΟΥ ΠΛΗΓΩΝΟΥΝ	20,000.00
ΣΚΑΚΙΣΤΙΚΟΣ ΟΜΙΛΟΣ ΗΡΑΚΛΕΙΟΥ	1,000.00
ΣΥΛΛΟΓΟΣ ΦΙΛΩΝ ΑΜΕΡΙΚΑΝΙΚΗΣ ΓΕΩΡΓΙΚΗΣ ΣΧΟΛΗΣ	52,000.00
ΣΥΛΛΟΓΟΣ ΦΙΛΩΝ ΤΩΝ ΠΑΙΔΙΩΝ ΜΕ ΧΡΟΝΙΕΣ ΡΕΥΜΑΤΟΠΑΘΕΙΕΣ	1,500.00
ΣΥΜΠΛΕΥΣΗ ΑΣΤΙΚΗ ΜΗ ΚΕΡΔΟΣΚΟΠΙΚΗ ΕΤΑΙΡΕΙΑ	3,000.00
ΣΥΝΔΕΣΜΟΣ ΕΠΙΧΕΙΡΗΣΕΩΝ ΚΑΙ ΒΙΟΜΗΧΑΝΙΩΝ ΣΕΒ	21,600.00
ΣΩΜΑ ΟΜΟΤΙΜΩΝ ΚΑΘΗΓΗΤΩΝ ΠΑΝΕΠΙΣΤΗΜΙΟΥ ΑΘΗΝΩΝ	140.00

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586 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

Τ.Ε. ΜΕΣ Α.Ε. COSTA NAVARINO	15,000.00
ΤΟ ΠΕΤΑΓΜΑ ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΓΙΑ ΤΗΝ ΥΠΟΣΤΗΡΙΖΟΜΕΝΗ ΔΙΑΒΙΩΣΗ ΑΤΟΜΩΝ ΜΕ ΝΟΗΤΙΚΗ ΣΤΕΡΗΣΗ	3,000.00
ΤΟ ΧΑΜΟΓΕΛΟ ΤΟΥ ΠΑΙΔΙΟΥ	2,650.00
ΤΟΠΙΚΗ ΔΙΟΙΚΟΥΣΑ ΕΠΙΤΡΟΠΗ ΠΑΡΑΡΤΗΜΑΤΟΣ ΕΛΕΠΑΠ ΑΓΡΙΝΙΟΥ	250.00
ΥΠΟΥΡΓΕΙΟ ΠΡΟΣΤΑΣΙΑΣ ΤΟΥ ΠΟΛΙΤΗ ΕΛ.ΑΣ	79,987.10
ΦΕΣΤΙΒΑΛ ΚΙΝΗΜΑΤΟΓΡΑΦΟΥ ΘΕΣΣΑΛΟΝΙΚΗΣ ΝΠΙΔ	50,000.00
ΦΙΛΑΝΘΡΩΠΙΚΟΣ ΣΥΝΔΕΣΜΟΣ ΣΤΗΡΙΞΗΣ ΑΤΟΜΩΝ ΜΕ ΑΝΟΙΑ - ΙΘΑΚΗ	500.00
ΦΙΛΟΙ ΚΟΙΝΩΝΙΚΗΣ ΠΑΙΔΙΑΤΡΙΚΗΣ ΙΑΤΡΙΚΗΣ ΑΝΟΙΧΤΗ ΑΓΚΑΛΙΑ	5,000.00
ΧΑΤΖΗΚΥΡΙΑΚΕΙΟ ΙΔΡΥΜΑ ΠΑΙΔΙΚΗΣ ΠΡΟΣΤΑΣΙΑΣ	402.05
ΧΡΙΣΤΙΑΝΙΚΗ ΑΔΕΛΦΟΤΗΣ ΝΕΩΝ ΘΕΣΣΑΛΟΝΙΚΗΣ	1,000.00
	2,677,994.62

PAYMENTS DUE TO DONATIONS, SPONSORSHIP, SUBSIDIES OR OTHER CHARITABLE REASONS TO LEGAL ENTITIES, OF AMOUNTS LESS THAN € 100 PER LEGAL ENTITY
Name*
ΜΠΑΝΤΑ ΔΗΜΟΥ ΑΡΤΑΙΩΝ
ΦΙΛΑΡΜΟΝΙΚΗ ΔΗΜΟΥ ΣΚΟΥΦΑ

The above table refers to donations, sponsorship, subsidies of other charitable reasons to legal entities, of amounts less than € 100, with total amount equal to € 110.

A) TO LEGAL ENTITIES	**2,678,104.62**

B) TO INDIVIDUALS - EIGHT (8) BENEFICIARIES	**15,968.21**

DONATIONS OF FIXED ASSETS
Name*
123ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΘΗΝΩΝ
12ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΖΩΓΡΑΦΟΥ
13ο ΝΗΠΙΑΓΩΓΕΙΟ ΒΟΛΟΥ
17ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΝΙΚΑΙΑΣ
180 ΜΟΙΡΑ ΚΑΤΕΥΘ/ΝΩΝ ΒΛΗΜΑΤΩΝ
1ο ΓΥΜΝΑΣΙΟ ΑΓ. ΠΑΡΑΣΚΕΥΗΣ
1ο ΓΥΜΝΑΣΙΟ ΧΑΛΑΣΤΡΑΣ
1ο ΓΥΜΝΑΣΙΟ ΧΑΝΙΩΝ
1ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΛΑΜΙΑΣ
1ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΥΜΗΤΤΟΥ
1ο ΓΥΜΝΑΣΙΟ ΚΑΛΛΙΠΟΛΗΣ
1ο ΓΥΜΝΑΣΙΟ ΣΠΑΤΩΝ
1ο ΔΗΜ.ΣΧΟΛΕΙΟ ΑΥΛΩΝΑ
1ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΙΓΙΟΥ
1ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΤΡΙΚΑΛΩΝ
1ο ΕΙΔΙΚΟ ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ
1ο ΕΠΑΛ ΚΟΡΙΝΘΟΥ
2 ΓΕΝΙΚΟ ΛΥΚΕΙΟ ΧΑΛΑΝΔΡΙΟΥ
2/Θ ΝΗΠΙΑΓΩΓΕΙΟ ΒΑΡΥΠΕΤΡΟΥ ΧΑΝΙΑ
28ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΘΕΣΣΑΛΟΝΙΚΗΣ
2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΒΡΟΝΤΑΔΟΥ
2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΝΕΑΣ ΜΑΓΝΗΣΙΑΣ
2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΠΕΙΡΑΙΑ
2ο ΝΗΠΙΑΓΩΓΕΙΟ ΑΜΑΛΙΑΔΑΣ
2η ΜΟΙΡΑ ΑΛΕΞΙΠΤΩΤΙΣΤΩΝ
2ο ΓΥΜΝΑΣΙΟ ΘΕΡΜΗΣ

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587 ANNUAL FINANCIAL REPORT The amounts are presented in thousands of Euro unless otherwise indicated

2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΙΓΙΝΑΣ
2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΛΙΒΕΡΙΟΥ
2ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΥΜΗΤΤΟΥ
2ο ΝΗΠΙΑΓΩΓΕΙΟ ΑΓ. ΑΘΑΝΑΣΙΟΥ
30ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΒΟΛΟΥ
3ο ΣΧΟΛΕΙΟ ΔΕΥΤΕΡΗΣ ΕΥΚΑΙΡΙΑΣ
3ο ΓΥΜΝΑΣΙΟ ΚΗΦΙΣΙΑΣ
3ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΣΧΗΜΑΤΑΡΙΟΥ
3ο ΕΡΓΑΣΤΗΡΙΑΚΟ ΚΕΝΤΡΟ Γ' ΑΘΗΝΑΣ
4ο ΓΥΜΝΑΣΙΟ ΝΕΑΣ ΙΩΝΙΑΣ
4ο ΔΗΜΟΤΙΚΟ ΔΙΔΥΜΟΤΕΙΧΟΥ
4ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΛΙΒΑΔΕΙΑΣ
4ο ΓΕΝΙΚΟ ΛΥΚΕΙΟ ΠΕΝΤΕΛΗΣ
4ο ΓΥΜΝΑΣΙΟ ΝΕΑΣ ΣΜΥΡΝΗΣ
54ο ΓΥΜΝΑΣΙΟ ΑΘΗΝΩΝ
5ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΚΑΛΛΙΘΕΑΣ
5ο ΓΕΛ ΙΛΙΟΥ
5ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΡΓΥΡΟΥΠΟΛΕΩΣ
5ο ΝΗΠΙΑΓΩΓΕΙΟ ΑΧΑΡΝΩΝ
71 ΑΕΡΟΜΕΤΑΦΕΡΟΜΕΝΗ ΤΑΞΙΑΡΧΙΑ
7ο ΝΗΠΕΙΑΓΩΓΕΙΟ ΒΟΛΟΥ
7ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΚΑΛΑΜΑΤΑΣ
88 ΣΤΡΑΤΙΩΤΙΚΗ ΔΙΟΙΚΗΣΗ "ΛΗΜΝΟΣ"
98ο ΤΑΓΜΑ ΕΘΝΟΦΥΛΑΚΗΣ
9ο ΓΕΝΙΚΟ ΛΥΚΕΙΟ ΠΕΡΙΣΤΕΡΙΟΥ
9ο ΓΥΜΝΑΣΙΟ ΒΟΛΟΥ
9ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΧΑΡΝΩΝ
Α.Τ. ΑΕΡΟΠΟΛΗΣ
Α.Τ. ΚΑΛΛΙΘΕΑΣ
ΑΘΛΗΤΙΚΟΣ ΠΟΔΟΣΦΑΙΡΙΚΟΣ ΣΥΛΛΟΓΟΣ ΙΛΙΟΥ
ΑΘΛΗΤΙΚΟΣ ΣΥΛΛΟΓΟΣ ΚΑΛΛΙΘΕΑΣ
ΑΘΛΗΤΙΚΟΣ ΣΥΛΛΟΓΟΣ ΚΙΟΝΓΚ ΧΙ
ΑΣΤΥΝ.ΤΜΗΜΑ ΜΕΣΟΛΟΓΓΙΟΥ
ΑΣΤΥΝΟΜΙΑ ΤΜ ΚΤΙΡΙΟΛΟΓΙΚΗΣ ΥΠΟΔΟΜΗΣ
ΑΣΤΥΝΟΜΙΚΟ ΤΜΗΜΑ ΑΙΓΑΛΕΩ
ΑΣΤΥΝΟΜΙΚΟ ΤΜΗΜΑ ΑΚΡΟΠΟΛΕΩΣ
ΑΣΤΥΝΟΜΙΚΟ ΤΜΗΜΑ ΑΡΓΟΥΣ - ΜΥΚΗΝΩΝ
ΑΣΤΥΝΟΜΙΚΟ ΤΜΗΜΑ ΒΑΡΗΣ - ΒΟΥΛΑΣ -
ΑΣΤΥΝΟΜΙΚΟ ΤΜΗΜΑ ΣΚΙΑΘΟΥ
Β' ΑΣΤΥΝΟΜΙΚΟ ΤΜΗΜΑ ΠΕΡΙΣΤΕΡΙΟΥ
ΒΙΒΛΙΟΘΗΚΗ ΑΜΑΛΙΑΔΑΣ
Γ.Α.Δ.Α. / ΔΑΕΕΒ / ΤΜΗΜΑ 5
Γ.Ν.Α. ΕΥΑΓΓΕΛΙΣΜΟΣ
ΓΕΝΙΚΑ ΑΡΧΕΙΑ ΚΡΑΤΟΥΣ
ΓΕΝΙΚΗ ΠΕΡΙΦ. ΑΣΤΥΝ. Δ/ΝΣΗ ΗΠΕΙΡΟΥ
ΓΕΝΙΚΗ ΠΕΡΙΦΕΡΕΙΑΚΗ ΑΣΤΥΝΟΜΙΚΗ ΔΙΕΥΘΥΝΣΗ ΣΤΕΡΕΑΣ ΕΛΛΑΔΟΣ
ΓΕΝΙΚΟ ΕΠΙΤΕΛΕΙΟ ΣΤΡΑΤΟΥ - Γ2 Δ/ΝΣΗ
ΓΕΝΙΚΟ ΛΥΚΕΙΟ ΠΥΛΟΥ
ΓΕΝΙΚΟ ΝΟΣΟΚΟΜΕΙΟ ΖΑΚΥΝΘΟΥ
ΓΥΜΝΑΣΙΟ ΑΙΑΝΤΕΙΟΥ ΣΑΛΑΜΙΝΟΣ
ΓΥΜΝΑΣΙΟ ΚΑΛΗΣ
ΓΥΜΝΑΣΙΟ ΚΡΙΕΖΩΝ
ΓΥΜΝΑΣΙΟ ΝΕΑΠΟΛΕΩΣ ΛΑΚΩΝΙΑΣ
ΓΥΜΝΑΣΙΟ ΣΙΑΤΙΣΤΑΣ

* Names have not been translated into english.

ΓΥΜΝΑΣΙΟ ΣΚΙΑΘΟΥ
ΓΥΜΝΑΣΙΟ ΣΚΟΥΤΑΡΕΩΣ ΣΕΡΡΩΝ
Δ.Δ.Ε. ΠΕΙΡΑΙΑ
Δ/ΝΣΗ ΑΜΕΣΗΣ ΔΡΑΣΗΣ ΑΤΤΙΚΗΣ
Δ/ΝΣΗ ΑΣΦΑΛΕΙΑΣ ΑΤΤΙΚΗΣ
ΔΗΜΟΣ ΑΓΙΑΣ ΒΑΡΒΑΡΑΣ
ΔΗΜΟΣ ΑΓΙΩΝ ΑΝΑΡΓΥΡΩΝ-ΚΑΜΑΤΕΡΟΥ
ΔΗΜΟΣ ΑΘΗΝΩΝ
ΔΗΜΟΣ ΑΝΔΡΟΥ
ΔΗΜΟΣ ΑΡΓΟΣΤΟΛΙΟΥ
ΔΗΜΟΣ ΔΙΟΝΥΣΟΥ
ΔΗΜΟΣ ΔΙΟΝΥΣΟΥ - ΔΗΜΟΤΙΚΗ ΚΟΙΝΟΤΗΤΑ
ΔΗΜΟΣ ΕΛΑΦΟΝΗΣΟΥ
ΔΗΜΟΣ ΙΘΑΚΗΣ
ΔΗΜΟΣ ΚΡΩΠΙΑΣ ΠΡΩΤΟΒΑΘΜΙΑ
ΔΗΜΟΣ ΜΑΡΚΟΠΟΥΛΟΥ
ΔΗΜΟΣ ΝΑΞΟΥ ΚΑΙ ΜΙΚΡΩΝ ΚΥΚΛΑΔΩΝ
ΔΗΜΟΣ ΞΥΛΟΚΑΣΤΡΟΥ ΕΥΡΩΣΤΙΝΗΣ
ΔΗΜΟΣ ΠΑΠΑΓΟΥ - ΧΟΛΑΡΓΟΥ
ΔΗΜΟΣ ΠΥΛΟΥ - ΝΕΣΤΟΡΟΣ
ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΑΛΙΜΟΥ "ΚΥΒΕΛΗ"
ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΕΞΑΠΛΑΤΑΝΟΥ
ΔΙΕΥΘΥΝΣΗ ΑΣΤΥΝΟΜΙΑΣ ΑΘΗΝΩΝ
ΔΙΕΥΘΥΝΣΗ ΤΡΟΧΑΙΑΣ ΑΤΤΙΚΗΣ
ΔΙΟΙΚΗΣΗ ΠΥΡΟΣΒΕΣΤΙΚΩΝ ΥΠΗΡΕΣΙΩΝ
ΕΘΕΛΟΝΤΙΚΗ ΟΜΑΔΑ ΕΡΕΥΝΑΣ ΚΑΙ ΔΙΑΣΩΣΗΣ ΜΕΣΟΛΟΓΓΙΟΥ
ΕΘΝΙΚΟ ΚΕΝΤΡΟ ΑΜΕΣΗΣ ΒΟΗΘΕΙΑΣ
ΕΛΛΗΝΙΚΗ ΑΣΤΥΝΟΜΙΑ 2ο ΤΜΗΜΑ
ΕΛΛΗΝΙΚΗ ΟΜΟΣΠΟΝΔΙΑ ΠΕΤΟΣΦΑΙΡΙΣΗΣ
ΕΛΛΗΝΙΚΟ ΠΑΙΔΙΚΟ ΜΟΥΣΕΙΟ
ΕΝΟΤΗΤΑ ΕΡΓΑΤ/ΛΙΚΟΥ ΚΕΝΤΡΟΥ ΑΘΗΝΑΣ
ΕΝΩΣΗ ΑΘΛΗΤΙΚΩΝ ΣΩΜΑΤΕΙΩΝ ΣΕΓΑΣ
ΕΝΩΣΗ ΓΟΝΕΩΝ ΠΡΩΤ/ΜΙΑΣ ΕΚΠΑΙΔΕΥΣΗΣ
ΕΦΟΡΙΑ Ε' ΔΟΥ ΠΕΙΡΑΙΑ
Η ΦΛΟΓΑ
Ι. Ν. ΚΟΙΜΗΣΕΩΣ ΘΕΟΤΟΚΟΥ ΣΕΛΛΙΩΝ
ΙΕΡΟΣ ΝΑΟΣ ΑΓ. ΕΛΕΥΘΕΡΙΟΥ
Κ.Ε.ΔΗ.ΖΑ.Μ.
ΚΑΛΑΘΟΣΦΑΙΡΙΚΟΣ ΟΜΙΛΟΣ ΧΟΛΑΡΓΟΥ
ΚΑΠΗ ΜΟΛΑΩΝ
ΚΑΤΑΣΤΗΜΑ ΚΡΑΤΗΣΗΣ ΚΟΡΥΔΑΛΛΟΥ
ΚΕΝΤΡΟ ΕΚΠΑΙΔΕΥΣΗΣ ΤΕΧΝΙΚΟΥ
ΚΕΝΤΡΟ ΥΓΕΙΑΣ ΠΥΛΟΥ
ΚΟΙΝΟΤΗΤΑ ΛΕΥΚΑΚΙΩΝ
ΚΟΙΝΟΤΗΤΑ ΠΑΛΑΙΟΜΑΝΙΝΑΣ
ΛΙΜΕΝΑΡΧΕΙΟ ΚΑΛΥΜΝΟΥ
ΜΑΘΗΤΙΚΗ ΜΑΝΤΟΛΙΝΑΤΑ-ΧΟΡΩΔΙΑ ΖΑΚ
ΜΟΙΡΑ ΑΕΡΟΣΚΑΦΩΝ ΝΑΥΤΙΚΟΥ
ΜΟΥΣΙΚΟ ΓΥΜΝΑΣΙΟ ΙΛΙΟΥ
ΝΗΠΙΑΓΩΓΕΙΟ ΑΝΩ ΜΗΤΡΟΥΣΙΟΥ
ΝΗΠΙΑΓΩΓΕΙΟ ΜΑΥΡΟΒΟΥΝΙΟΥ
ΠΑΝΕΛΛΗΝΙΑ ΦΙΛΟΖΩΪΚΗ ΟΜΟΣΠΟΝΔΙΑ
ΠΑΝΕΛΛΗΝΙΟΣ ΣΥΝΔΕΣΜΟΣ ΤΥΦΛΩΝ
ΠΟΛΕΜΙΚΟ ΝΑΥΤΙΚΟ

* Names have not been translated into english.

ΠΟΛΙΤΙΣΤΙΚΟΣ ΛΑΟΓΡΑΦΙΚΟΣ ΣΥΛΛΟΓΟΣ ΡΙΖΑΣ
ΠΟΛΙΤΙΣΤΙΚΟΣ ΣΥΛΛΟΓΟΣ ΔΕΝΔΡΩΝ
ΠΥΡΟΣΒΕΣΤΙΚΗ ΥΠΗΡΕΣΙΑ ΚΑΡΠΕΝΗΣΙΟΥ
ΠΥΡΟΣΒΕΣΤΙΚΗ ΥΠΗΡΕΣΙΑ ΠΡΕΒΕΖΗΣ
ΠΥΡΟΣΒΕΣΤΙΚΗ ΥΠΗΡΕΣΙΑ ΣΑΜΟΥ
ΠΥΡΟΣΒΕΣΤΙΚΟ ΚΛΙΜΑΚΙΟ ΠΥΛΟΥ
ΣΤΡΑΤΟΠΕΔΟ ΚΑΡΑΙΣΚΑΚΗ Β-ΚΕΒΟΠ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ 13ου ΚΑΙ 21ου ΔΗΜΟΤ. ΣΧΟΛ. ΑΓ. ΔΗΜΗΤΡΙΟΥ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ 22ου ΛΥΚΕΙΟΥ ΑΘΗΝΩΝ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ 3ου ΔΗΜΟΤΙΚΟΥ ΣΧΟΛ. ΘΕΣΣΑΛΟΝΙΚΗΣ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ 58ο Δ.ΣΧ.ΑΘΗΝΩΝ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ 8ο ΔΗΜΟΤΙΚΟ ΣΧΟΛΕΙΟ ΚΟΡΥΔΑΛΛΟΥ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ 9ου ΔΗΜΟΤΙΚΟΥ ΣΧΟΛ. ΚΟΡΥΔΑΛΛΛΟΥ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ ΝΕΑΣ ΚΙΟΥ
ΣΥΛΛΟΓΟΣ ΓΟΝΕΩΝ ΚΑΙ ΚΗΔΕΜΟΝΩΝ ΠΕΥΚΗΣ
ΣΥΛΛΟΓΟΣ ΓΥΝΑΙΚΑ ΚΑΙ ΜΟΝΟΓΟΝΕΙΚΗ
ΣΥΛΛΟΓΟΣ ΕΚΠΑΙΔΕΥΤΙΚΩΝ ΠΡΩΤΟΒ.
ΣΥΛΛΟΓΟΣ ΣΥΝΤΑΞΙΟΥΧΩΝ ALPHA BANK
ΣΥΛΛΟΓΟΣ ΧΡΥΣΟΧΩΡΙΤΩΝ ΤΡΙΦΥΛΙΑΣ
ΤΜΗΜΑ ΑΛΛΟΔΑΠΩΝ ΑΤΤΙΚΗΣ
ΤΜΗΜΑ ΑΣΦΑΛΕΙΑΣ ΑΜΠΕΛΟΚΗΠΩΝ
ΤΜΗΜΑ ΑΣΦΑΛΕΙΑΣ ΕΛΛΗΝΙΚΟΥ
ΤΜΗΜΑ ΑΣΦΑΛΕΙΑΣ ΚΟΛΩΝΟΥ
ΤΜΗΜΑ ΑΦΑΛΕΙΑΣ ΠΑΙΑΝΙΑΣ
ΤΜΗΜΑ ΔΙΟΙΚΗΤΙΚΗΣ ΥΠΟΣΤΗΡΙΞΗΣ ΥΠ.ΕΣΩΤ.ΥΠΟΘΕΣΕΩΝ ΣΩΜ.ΑΣΦΑΛΕΙΑΣ Β.Ε.
ΤΜΗΜΣΑ ΑΣΦΑΛΕΙΑΣ ΝΕΑΣ ΙΩΝΙΑΣ
ΤΟ ΧΑΜΟΓΕΛΟ ΤΟΥ ΠΑΙΔΙΟΥ
ΤΟΠΙΚΗ ΚΟΙΝΟΤΗΤΑ ΠΑΝΤΑΝΑΣΣΑ
ΤΟΠΙΚΗ ΚΟΙΝΟΤΗΤΑ ΠΑΥΛΟΥ ΒΟΙΩΤΙΑΣ
ΥΠ.ΠΡΟΣΤΑΣΙΑΣ ΠΡΟΕΔΡΟΥ ΔΗΜΟΚΡΑΤΙΑΣ
ΥΠΗΡ.ΑΝΑΠΗΡΩΝ ΠΟΛΕΜΟΥ ΜΑΚ-ΘΡΑΚ
ΥΠΟΔΙΕΥΘΥΝΣΗ ΑΣΦΑΛΕΙΑΣ ΝΟΤ/ΚΗΣ
ΥΠΟΔΙΕΥΘΥΝΣΗ ΑΣΦΑΛΕΙΑΣ ΠΑΤΡΩΝ
ΥΠΟΥΡΓΕΙΟ ΑΝΑΠΤΥΞΗΣ ΚΑΙ ΕΠΕΝΔΥΣΕΩΝ
ΥΠΟΥΡΓΕΙΟ ΠΡΟΣΤΑΣΙΑΣ ΠΟΛΙΤΗ
ΩΚΕΑΝΟΣ Α.Τ.Ο.Ε.Ε.

The above table refers to donations of fully amortised fixed assets of the Bank with total residual value € 28.23.

TOTAL FOR MEDIA PAYMENTS	6,284,359.83
TOTAL PAYMENTS DUE TO DONATIONS, SPONSORSHIP, SUBSIDIES OR OTHER CHARITABLE REASONS TO LEGAL ENTITIES	2,678,104.62
TOTAL PAYMENTS DUE TO DONATIONS, SPONSORSHIP, SUBSIDIES OR OTHER CHARITABLE REASONS TO INDIVIDUALS	15,968.21

* Names have not been translated into english.

Availability of Annual Financial Report

The Annual Financial Report as at 31.12.2020, which includes:

- The Statement by the Members of Board of Directors
- The Board of Directors' Annual Management Report
- The Explanatory Report of the Board of Directors
- The Corporate Governance Statement
- The Independent Auditors' Report
- The Annual Financial Statements of the Bank and the Group

are available on the website address: https://www.alpha.gr/en/group/investor-relations/group-results-and-reporting/financial-statements-bank-and-group.

The Annual Financial Statements, the Independent Auditors' report and the Board of Directors' Report of consolidated companies are available on the website: https://www.alpha.gr/el/omilos/enimerosi-ependuton/oikonomika-stoixeia/oikonomikes-katastaseis-etairion-omilou.

Following the amendment dated 6.11.2020 of 815/2019 Regulation of the European Commission on the implementation of the European Single Electronic Format for the publication of the annual financial reports, and the relevant announcement of the Hellenic Capital Market Commission dated 22.1.2021, the Bank will make use of the extension of the deadline for mandatory implementation from 1.1.2020 to 1.1.2021.