

Alpha Services and Holdings S.A.
Pillar III Disclosures
Report for June 30, 2021



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List of Abbreviations

Abbreviation	Definition
ACM	Ambit Capital Manager
ALCo	Assets-Liabilities Management Committee
BoD	Board of Directors
BoG	Bank of Greece
Bps	Basis Point
BRRD	Bank Recovery and Resolution Directive
CAR	Capital Adequacy Ratios
CBR	Combined Buffers Requirements
CCF	Credit Conversion Factor
CCP	Code of Civil Procedure
CCR	Counterparty Credit Risk
CCyB	Countercyclical Capital Buffer
CDS	Credit Default Swaps
CET1	Common Equity Tier 1
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CRD	Capital Requirements Directive
CRE	Commercial Real Estate
CRM	Credit Risk Mitigation
CRO	Chief Risk Officer
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Valuation Adjustment
DTA	Deferred Tax Assets
EAD	Exposure at Default
EBA	European Banking Authority
ECAI	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
ELA	Emergency Liquidity Assistance
EU	European Union
FRTB	Fundamental Review of the Trading Book
FTP	Fund Transfer Pricing mechanism
FVTOCI	Fair Value Through Other Comprehensive Income
FVTPL	Fair Value Through Profit or Loss
FX	Foreign Exchange
GDP	Gross Domestic product
GL	Guidelines
GMRA	Global Master Repurchase Agreement
KPI	Key Performance Indicator
KRI	Key Risk Indicator
LAS	Liquidity Adequacy Statements
LCR	Liquidity Coverage Ratio
LGD	Loss given default
LTV	Loan to Value
HDIGF	Hellenic Deposit and Investment Guarantee Fund
IAS	International Accounting Standards
ICAAP	Internal Capital Adequacy Assessment Process
ICS	Internal Control System
ILAAP	Internal Liquidity Adequacy Assessment Process



Abbreviation	Definition
IFRS	International Financial Reporting Standards
IMA	Internal Model Approach
IRB	Internal Ratings Based (approach)
IRRBB	Interest Rate Risk in the Banking Book
ISDA	International Swap and Derivatives Association
IT	Information Technology
MREL	Minimum Requirement for Eligible Liabilities
NCA	National Competent Authorities
NPE	Non-Performing Exposure
NPL	Non-Performing Loan
NRA	National Resolution Authorities
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
O-SII	Other Systemically Important Institution
OTC	Over the Counter
P2R	Pillar 2 Requirement
PD	Probability of default
POCI	Purchased or Originated Credit Impaired
RAF	Risk Appetite Framework
RAS	Risk Appetite Statement
RCSA	Risk Control Self – Assessment
RRE	Residential Real Estate
RemCo	Remuneration Committee
RWA	Risk Weighted Assets
SA	Standardized Approach
SFTs	Securities Financing Transactions
SME	Small & Medium Enterprises
SPPI	Solely Payments of Principle and Interest
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRM	Single Resolution Mechanism
SSM	Single Supervisory Mechanism
STA	Standardized Approach
SVaR	Stressed Value at Risk
TAC	Troubled Assets Committee
TC	Total Capital
TSCR	Total SREP Capital Requirements
UTP	Unlikely to Pay
VaR	Value at Risk



1 Introduction

1.1 General Information

Alpha Bank is one of the leading banks of the Greek privately owned banking sector and constitutes a consistent point of reference for over 140 years. The Bank offers a wide range of high-quality financial products and services, including retail banking, SMEs and corporate banking, asset management and private banking, distribution of insurance products, investment banking, brokerage and real estate management.

Alpha Bank, which was founded in 1879 by John F. Kostopoulos, has its headquarters at 40 Stadiou Street, Athens, and is registered in the Register of Companies with number 6066/06/B/86/05. The Bank is subject to the Greek banking law and is supervised by the European Central Bank (ECB) and the Single Supervisory Mechanism (SSM).

On 12.3.2021, the Bank's Board of Directors decided the convening of the Extraordinary General Meeting of the Shareholders on 2.4.2021, with agenda items, among others the approval of the demerger of the société anonyme under the corporate name "Alpha Bank S.A." by way of hive down of its banking business sector with the incorporation of a new entity.

On 16 April 2021, the demerger of the former Alpha Bank S.A., then authorized to operate as a credit institution (under G.E.MI. number 223701000 and Tax Identification Number 094014249), which has been already renamed to "Alpha Services and Holdings S.A.", ("Group") was announced pursuant to the Decision of the Ministry of Development and Investments under protocol no 45089/16.4.2021 by way of hive-down of the banking business sector with the incorporation of a new company, which was licensed to operate as a credit institution under the name "Alpha Bank S.A." (under G.E.MI. number 159029160000 and Tax Identification Number 996807331) (the "Bank"), in accordance to the provisions of Article 16 of Greek law 2515/1997, as well as Articles 54 paragraph 3, 57 paragraph 3, 59-74 and 140 paragraph 3 of Greek law 4601/2019 and Article 145 of Greek law 4261/2014, as in force (the "Hive Down"). As a consequence of the Hive Down, the Bank substituted Alpha Holdings by operation of Greek law, as universal successor, in all of its assets and liabilities, rights and obligations and in general its legal relationships within the banking business sector.

Following the demerger, "Alpha Services and Holdings S.A.", is supervised on a consolidated basis and "Alpha Bank S.A" is supervised on a standalone basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

The Group is active in the Greek and international banking market, with presence in the United Kingdom, Cyprus, Romania, Albania and Luxembourg



2 Pillar III Disclosures Overview

2.1 Background

Group's Pillar III Report is prepared in accordance with disclosure requirements as laid down in Part Eight of the "Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms" (Capital Requirements Regulation, or CRR) and the "Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms" (Capital Requirements Directive IV, or CRD IV).

2.1.1 Disclosure enhancements

In January 2015, the Basel Committee on Banking Supervision (BCBS) published the Revised Pillar III Disclosure Requirements, followed by the publication, in December 2016, of the EBA Final Guidelines on disclosure requirements. These Guidelines provide banks with guidance in attaining compliance with the CRR and with the Basel Committee, and are effective from 31 December 2017.

In December 2018 EBA published guidelines that specify the common content and uniform disclosure formats for the information on NPEs, forbore exposures and foreclosed assets that credit institutions should disclose. Proportionality is embedded in the guidelines based on two criteria – the significance of the credit institution and the level of NPEs – and there is a set of templates that needs to be disclosed only by significant credit institutions with a gross NPL ratio of 5% or above.

Starting from 30 June 2021, institutions should align their disclosures with the changes introduced by the revised Regulation (EU) No 2019/876 (CRR2), amending Regulation (EU) No 575/2013 (CRR). The new regulation, combined with the implementation of the EBA's new policy strategy on institutions' Pillar III disclosures, seek to increase efficiency, consistency and comparability between institutions' disclosures and promote market discipline, in alignment with Basel Standards.

The new framework introduces the following updates:

- New quantitative and qualitative information regarding:
 - ✓ Disclosure of liquidity requirements
 - ✓ Disclosure of exposures to securitisation positions
- Amendments in the disclosure of existing information (quantitative or/and the qualitative), such as:
 - ✓ Disclosure of the leverage ratio
 - ✓ Disclosure of exposures to counterparty credit risk (revised in order to align them with CRR2 and with the revised Basel standards)

Following the outbreak of the COVID-19 pandemic and the response of governments across the globe and in the EU states by implementing measures to support borrowers, additional reporting and disclosures requirements were introduced on 2 June 2020 for the purposes of market discipline and transparency. The specific requirements take into account the Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (date of publication 2 April 2020).

EBA published on 1 March 2021, a consultation paper on draft implementing technical standards (ITS) on Pillar 3 disclosures on Environmental, Social and Governance (ESG) risks. The draft ITS put forward comparable disclosures that show how climate change may exacerbate other risks within institutions' balance sheets, how institutions are mitigating those risks, and their green asset ratio on exposures financing taxonomy-aligned activities, such as those consistent with the Paris agreement goals.



On 28 May 2021, EBA launched a public consultation on draft implementing technical standards (ITS) on Pillar 3 disclosures regarding exposures to interest rate risk on positions not held in the trading book (IRRBB). The draft ITS put forward comparable disclosures that would allow stakeholders to assess institutions' IRRBB risk management framework as well as the sensitivity of institutions' economic value of equity and net interest income to changes in interest rates. The proposed standards will amend the comprehensive ITS on institutions' public disclosures, in line with the strategic objective of developing a single and comprehensive Pillar 3 package that should facilitate implementation by institutions and further promote market discipline.

2.1.2 Approval and publication

In accordance with the Group's internal governance framework, a "Pillar III Disclosures Policy" has been developed and implemented that ensures consistent and continuous compliance with the disclosure requirements of the regulatory framework and best practices.

The adopted policy sets the minimum content of public disclosures presented.

The Bank with the aim to apply, at all times, best practices and cover any new regulatory requirements, revises its disclosure policy on an annual basis or when deemed necessary and updates the extent and type of information provided at each disclosure date accordingly.

The Bank publishes the Pillar III report via its website, within the applicable deadlines. The data included in this report may be different than the respective accounting data, mainly due to differences between the regulatory consolidation and the accounting consolidation and/or differences in the definitions used. However, the Group's financial statements, used together with Pillar III disclosures, complement market participants' information and enhance transparency.

The disclosures included within this report were verified and approved internally in line with the Disclosures policy which is approved by the Board. Business units attest to the accuracy and of their data submissions. Consistency checks and reconciliations are performed with accounting and regulatory data. The information in this report is subject to the same level of internal control processes as the information provided by the Group for its financial reporting.

2.2 Supervision and Regulatory Framework

Single Supervisory Mechanism (SSM)

Since November 2014, Alpha Bank has been assessed as "Other Systemically Important Institution" (O-SII) and, as such, is directly supervised by the ECB in accordance with the SSM framework.

The Single Supervisory Mechanism (SSM) refers to the system of banking supervision in Europe and it comprises the ECB and the national supervisory authorities of the participating countries.

The applicable banking regulatory framework in the European Union (EU), the Basel 3 capital framework, is effective from January 1, 2014. It was implemented by the "Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms" (Capital Requirements Regulation, or CRR) published on June 27, 2013, in combination with the "Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms" (Capital Requirements Directive IV, or CRD IV) published on June 27, 2013 that has been transposed into the Greek legislative framework by the Law 4261/2014. The framework has been amended by the Regulation (EU) 2019/876 (CRR II) of 20 May 2019 and the Directive (EU) 2019/878 (CRD V) of 20 May 2019. The latter has been transposed into the Greek legislative framework by the Law 4799/2021

For the calculation of capital adequacy ratio the above framework is followed.

Regarding the capital ratios the following minimums apply:

- 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 the Combined Buffer Requirement (CBR) consisting of:
 - The Capital conservation buffer stands at 2.5%.
 - The capital buffers set by the Bank of Greece through Executive Committee Acts:
 - Other systemically important institutions (O-SII) buffer, which will gradually rise to “one percent” (1%) from 1.1.2019 to 1.1.2023. For 2021, the O-SII buffer stands at 0.5%.
 - Countercyclical capital buffer equal to “zero percent” (0%) for 2021

Supervisory Review and Evaluation Process (SREP)

According to Council Regulation 1024/2013, ECB conducts annually a Supervisory Review and Evaluation Process (SREP) to assess the risk profiles of the institutions under its remit.

This process evaluates the:

- Sustainability and viability of business model
- Adequacy of governance and risk management
- Assessment of risk to capital and
- Assessment of risks to liquidity and funding

Following the assessment the ECB determines the minimum capital requirements and sets qualitative requirements to each of the banking institutions.

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.

Measures taken for the banks in order to tackle Covid-19 pandemic

As the economic effects of the coronavirus (COVID-19) started becoming apparent, the ECB, the European Banking Authority (EBA) and the European Commission (EC), announced a number of measures to ensure that the banks they supervise will continue to fulfil their role in funding the real economy. Specifically, starting from March 2020, 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 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 change expected in 2021 under CRD V regarding the composition of the Pillar 2 requirement (P2R) buffer was brought forward allowing the (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.



- In parallel ECB issued a recommendation to banks to limit the payment of dividends and share buy-backs. According to a press release issued by the ECB on 23 July 2021 this recommendation remains applicable until 30 September 2021. In addition, on 23 July 2021, the ECB announced that it expects that banks will adopt a prudent and forward-looking approach when deciding on remuneration policies.

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 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.

In 22 December 2020, the Commission Delegated Regulation (EU) 2020/2176 of 12 November 2020, amending Delegated Regulation (EU) 241/2014 concerning the deduction of software assets from CET1 items, was published in the Official Journal of the European Union.

2.3 Significant Developments

2.3.1 Capital Issuances

As part of the strategic capital management during 2021, Alpha Services and Holdings S.A. has successfully completed:

- On March 4th 2021, Alpha Bank S.A. 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.
- On July 2nd 2021, the offer of € 800 million of new common shares further strengthening its capital ratios.

2.3.2 Stress Test

Following the postponement of the 2020 Stress Test due to the outbreak of COVID – 19 (Coronavirus) and its global spread, the European Banking Authority (EBA) launched the 2021 EU-wide Stress Test on 29 January 2021. The Stress Test was conducted based on a static balance sheet approach under a baseline and an adverse macro scenario with a 3-year forecasting horizon (2020-2023). The exercise will be used as an input in the Supervisory Evaluation Process (SREP). The results of the exercise were published on 30 July 2021. According to the results the Group concluded successfully the 2021 EU-wide Stress Test under both scenarios. More specifically:

- Under the baseline scenario, the capital generation for the 3-year period was 2.8% fully absorbing 2.4% IFRS 9 phase-in, resulting in 2023 to a CET1 fully loaded ratio of 17.3% while the 2023 Leverage ratio (fully loaded) came to 13.0%.
- Under the adverse scenario, the 2023 CET1 transitional ratio stood at 8.3%, largely driven by the negative impact of Credit Risk, with the lowest point of CET1 fully loaded at 8.1%, in 2022. The 2023 Leverage ratio (fully loaded) resulted in 6.1%.



- The Stress Test methodology does not take into account capital strengthening (i.e. Tier II issuance, Share Capital Increase) and balance sheet de-risking (i.e. Galaxy transaction), events post December 31st, 2020. Pro-forma with the Share Capital Increase for the baseline scenario, the 2023 CET1 fully loaded ratio reached 19.1%, while the 2023 Leverage ratio (fully loaded) came to 14.4%. Under the adverse scenario, the 2023 CET1 fully loaded ratio stood at 10.2%, while the 2023 Leverage ratio (fully loaded) came to 7.6%.

2.3.3 Minimum Requirement of Own Funds and Eligible Liabilities

On 15 April 2021, Alpha Bank received a communication from the Single Resolution Board (SRB) regarding the binding Minimum Requirement of Own Funds and Eligible Liabilities (MREL). The requirements are based on the Bank Recovery and Resolution Directive (“BRRD2”), which was transposed under Greek law 4799/2021 on 18.5.2021.

The SRB decision is based on a single point of entry resolution strategy.

According to the SRB decision, Alpha Bank needs to meet from 1 January 2026 on a consolidated basis the following MREL requirements, namely 22.76% of Total Risk Exposure Amount (TREA) and 5.91% of Leverage Exposure (LRE). The communication also sets out the interim MREL requirements that must be met from 1 January 2022, namely 14.02% of TREA and 5.91% of LRE.

The MREL ratio expressed as a percentage of RWAs does not include the Combined Buffer Requirement (CBR), currently at 3% and expected to increase to 3.25% on 1 January 2022. With regard to the requirement for a minimum amount of own funds and subordinated eligible liabilities (“the Subordinated MREL Requirement”), the SRB has decided that no subordination requirement applies to Alpha Bank.

The MREL requirements, including the multi-year transitional period, are in line with Alpha Bank’s expectations. Alpha Bank’s long-term funding plan foresees further MREL strengthening so that these requirements can be met when applicable.

On September 16th, Alpha Bank successfully completed its inaugural Senior Preferred offering to continue to build its MREL basket. In this respect, Alpha Bank launched its inaugural EUR 500m Senior Preferred bond. The issuance has a 6.5-year maturity and is callable in year 5.5 with a coupon of 2.5% and a yield of 2.625%. The bond is listed on the Luxembourg Stock Exchange – EuroMTF Market. This transaction, fully aligned with Alpha Bank’s MREL strategy communicated earlier in the year, significantly enhances the Bank’s presence in the international capital markets, diversifies its investor base and improves its funding profile.

2.3.4 NPE Plan & NPE initiatives

NPE Plan (Update)

On April 2021, the Bank submitted an updated NPE Business Plan for the period 2021 - 2023 incorporating Covid-19 impact in its projections according to the latest requirement from SSM.

The NPE plan is based on a Covid-19 pandemic scenario under which the economic activity is expected to pick up as we progress in 2021.

The Group’s total NPE portfolio as of Q4 2020 amounted to c. Euro 20.9 billion with a corresponding NPE ratio of 43%. The target group NPE ratio for end of 2023 was set at 6% translated to a Euro 18.4 billion reduction when compared to Q4 2020.

NPE initiatives

One of the key pillars of the Bank's Strategy is the de-risking of its balance sheet, putting capital to work with a view to improve its asset quality and normalize the cost of risk.

Alpha Bank planned a frontloading of its efforts through a large securitization transaction of c. Euro 10.8 billion GBV, of both retail and wholesale NPEs, known as project Galaxy, making use of the Hellenic Asset Protection Scheme for the retained senior tranche of Euro 3.8 billion. Despite the difficulties faced due to the persistence of the COVID-19 pandemic, the transaction was concluded in Q2 2021.

Along with the securitization transaction, Alpha Bank also concluded the sale of its servicing platform, supporting Project Galaxy and enhancing business model efficiency. The servicer, new CEPAL, is expected to manage a total of Euro 28 billion of NPEs from Alpha Bank and third parties, including an exclusivity agreement with Alpha Bank to manage its remaining NPEs.

Finally, the Hive Down, which is a key enabler to this whole endeavor, which entailed a corporate reorganization structure allowing for a much better risk profile in terms of asset quality, was completed in April 2021.

Following the delivery of Project Galaxy, the largest NPE securitization in Greece and second largest in Europe, Alpha Bank, within its Q1 2021 results announcement, guided for an acceleration of the NPE reduction targets by committing to delivering a further clean-up of Euro 8.1 billion of NPE volumes in 2021-2022, contained within four distinct projects and smaller initiatives which have already been initiated:

- Project Cosmos (for which application will be submitted under the HAPS scheme extension) - mainly secured portfolio of Euro 3.5 billion GBV majority consisting of mortgage and SBL NPEs
- Project Solar – an SME portfolio of Euro 0.4 billion GBV that has been assigned by all systemic banks for management to DoValue
- Project Orbit – sale of a domestic retail unsecured portfolio of Euro 1.3 billion GBV
- Project Sky – sale of a mixed portfolio of residential mortgages and corporate/SME exposures in Cyprus, of a total GBV of Euro 2.2 billion
- Other transactions - selected wholesale and leasing exposures of up to Euro 0.7 billion GBV, for which the Bank is currently working with Cepal to identify the optimal transaction structure

After the completion of project Galaxy, the Group NPE and NPL ratio stands at 26% and 16%, respectively, and it is expected to be reduced to c.7% and c.5% respectively by the end of 2022, as a result of the above series of NPE transactions, as well as considering the expected organic evolution of the remaining book. This would entail reduction of total stock of NPEs by approximately 75% until the end of 2022 allowing to reduce NPE stock to c. Euro 2.9 billion

2.3.5 Updated Strategic Plan

During its Q1 2021 results, Alpha Bank shared the latest strategy update based on four main pillars:

- Decisively conclude NPE initiatives (as described above), reducing NPE ratio to average European levels; following project Galaxy delivery, NPE reduction targets will be accelerated by delivering a further clean-up of EUR 8.1 billion of NPE volumes contained within four distinct projects and other smaller initiatives that have already been initiated



- Continue progress in delivery on ambitious targets of the cost reduction and transformational plans; cost reduction will be achieved through a) reduction of NPEs that will drive down the respective costs along with b) the transformation effort put together in our operations transformation plan which aims at modernizing the Bank, increasing speed and quality of processes while also optimizing third party spend throughout spend categories
- Leverage partnerships in driving the growth of fee and commission income; the increase will be mainly driven a) by the higher business activity and improvement in lending volumes (in light of higher RRF driven lending), b) the increase in bancassurance fees on the back of the exclusive partnership signed with Generali, c) the significant growth in Asset Management related fees and d) the international fee income that is mostly related to Romania fee growth
- Strategic deployment of excess capital in Romania to accelerate lending growth and increase profitability

The updated Strategic Plan suggested a capital raise of Euro 800 million to be in position to fully reap the benefits from the RRF growth potential. Securing this growth capital, would allow Alpha Bank to reach the profitability target sooner and provide the Bank with the flexibility needed to commit in financing high-value projects.

Alpha Bank successfully concluded the share capital increase in July 2021, positioning the Group to be one of the key banking pillars that will unlock RRF funds for its customers.

3 Capital Management

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 Capital Strategy of the Group commits to maintain sound capital adequacy both from economic and regulatory perspective. It aims at monitoring and adjusting the 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 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.

The Group remains committed to the implementation of its strategy, re-calibrating its approach in order to reflect changes in the market environment. The Bank has consistently delivered on its targets to clean-up its balance sheet and is on track with the execution of its NPE plan. It also has successfully addressed the challenges and risks that the outbreak of COVID-19 posed to banks. Following the announcement of the project "Tomorrow" and the recent successful share capital increase the Bank is well positioned to look ahead, towards a period of strong growth for the economy and the banking system, and deliver on the targets of its Strategic Plan.

Main elements impacting Asset Quality, Capital and Liquidity

- The Group completed a Euro 0.8 billion Share Capital Increase in July 2021. Post completion of Galaxy and equity raise, Group's capital position remains solid with Total Capital Ratio at 17.4% and Fully loaded CET1 at 15.4%.
- The Group NPE cash coverage increased to 54% and in Greece to 49%. The NPL coverage ratio stands at 84%, while total coverage including collateral came to 126%.
- The Group's Loan to Deposit Ratio materially improved to 83% at the end of June 2021 versus 96% the year prior and the Group's Liquidity Coverage Ratio (LCR) stands at 169%, far exceeding the regulatory minimum of 100%.
- ECB funding stood at Euro 12.9 billion or 18% over Total Assets, with a significant positive contribution on Net Interest Income from the benefit of 1.00% TLTRO cost.

3.1 Capital Ratios

The Capital Adequacy Ratio is calculated as the result of the Group's regulatory capital (own funds) to its RWAs. Regulatory capital includes Common Equity Tier 1 (CET1) capital (share capital, reserves, and minority interests), additional Tier 1 capital (AT1) (hybrid securities) and Tier 2 capital (subordinated debt). RWAs include the credit risk of the banking book, the market risk of the trading book, the operational risk, the counterparty credit risk/CCR and credit valuation adjustment/CVA.

As shown in the following table, on 30.6.2021, Alpha Bank's CET1 stood at Euro4.9 billion and the total Regulatory Capital at 5.9 billion, while the total RWAs amounted to Euro 38.1billion resulting in a CET1 ratio of 12.8%, and total Capital Adequacy Ratio of 15.5% decreased by 283 bps versus 31.03.2021, mainly due to the completion of the Galaxy transaction.

The Deferred Tax Assets (DTAs) stood at Euro 5.3 billion with the eligible amount to be converted to tax credit claims at Euro 2.97 billion.

Template 1: Capital Adequacy Ratios (%)

(Amounts in millions of Euro)

	a	b
	30.6.2021	31.3.2021
Capital Type		
CET1	4.877	7.086
Tier 1 Capital	4.878	7.087
Tier 2 Capital	1.013	1.013
Total Regulatory Capital for C.A.R. calculation	5.892	8.100
Risk Weighted Assets	38.109	44.296
Capital Ratios		
CET1 Ratio	12.8%	16.0%
Tier 1 Ratio	12.8%	16.0%
Capital Adequacy Ratio (Tier 1 + Tier 2)	15.5%	18.3%

3.1.1 Key metrics

In the following table EU KM1 key regulatory metrics and ratios are provided as well as related input components as defined by the amended versions of CRR and CRD. They comprise own funds, RWAs, capital ratios, additional requirements based on SREP, capital buffer requirements, leverage ratio, liquidity coverage ratio and net stable funding ratio.



Template 2: EU KM1 - Key metrics template

(Amounts in millions of Euro)

		a	b	c	d	e
		30.6.2021	31.3.2021	31.12.2020	30.9.2020	30.6.2020
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	4,877	7,086	7,827	7,909	7,941
2	Tier 1 capital	4,878	7,087	7,830	7,912	7,944
3	Total capital	5,892	8,100	8,342	8,424	8,456
Risk-weighted exposure amounts						
4	Total risk-weighted exposure amount	38,109	44,296	45,369	46,054	46,289
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	12.8%	16.0%	17.3%	17.2%	17.2%
6	Tier 1 ratio (%)	12.8%	16.0%	17.3%	17.2%	17.2%
7	Total capital ratio (%)	15.5%	18.3%	18.4%	18.3%	18.3%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3.00%	3.00%	3.00%	3.00%	3.00%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.25%	2.25%	2.25%	2.25%	2.25%
EU 7d	Total SREP own funds requirements (%)	11.00%	11.00%	11.00%	11.00%	11.00%
Combined buffer requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 9a	Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer	0.50%	0.50%	0.50%	0.50%	0.50%
11	Combined buffer requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
EU 11a	Overall capital requirements (%)	14.00%	14.00%	14.00%	14.00%	14.00%
12	CET1 available after meeting the total SREP own funds requirements (%)	4.55%				
Leverage ratio						
13	Leverage ratio total exposure measure	60,729	62,194	61,765	62,678	67,430
14	Leverage ratio	8.0%	11.4%	12.7%	12.6%	11.8%
Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%				
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.00%				
EU 14c	Total SREP leverage ratio requirements (%)	3.44%				
EU 14d	Leverage ratio buffer requirement (%)	0.00%				
EU 14e	Overall leverage ratio requirements (%)	3.44%				
Liquidity Coverage Ratio						



		a	b	c	d	e
		30.6.2021	31.3.2021	31.12.2020	30.9.2020	30.6.2020
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	7,309	6,508	5,820	4,817	
EU 16a	Cash outflows - Total weighted value	6,329	6,402	6,410	6,248	
EU 16b	Cash inflows - Total weighted value	1,105	1,130	1,165	1,125	
16	Total net cash outflows (adjusted value)	5,224	5,272	5,246	5,123	
17	Liquidity coverage ratio (%) (adjusted values) ⁽¹⁾	140%	124%	112%	94%	
17a	Liquidity coverage ratio (%)	169.2%	147.3%			
Net Stable Funding Ratio						
18	Total available stable funding	58,977				
19	Total required stable funding	52,936				
20	NSFR ratio (%)	111.4%				

⁽¹⁾Average figures based on previous monthly data points

3.2 IFRS 9 Capital Impact

On December 12, 2017 the EU adopted Regulation No 2395/2017 of the European Parliament and of the Council amending EU Regulation 575/2013, as regards transitional arrangements to mitigate the impact of the introduction of IFRS 9 on regulatory capital and leverage ratios. The new Regulation inserts a new article 473a in CRR 575/2013 which introduces a 5-year transitional period during which allows banks to add to the CET1 ratio the post-tax amount of the difference in provisions that resulted from the transition to the IFRS 9 in relation to the provisions that have been recognized at 31.12.2017 in accordance with IAS 39 ("Static" amount). The weighting factors were set per year at 0.95 in 2018, 0.85 in 2019, 0.7 in 2020, 0.5 in 2021 and 0.25 in 2022.

On June 24, 2020 as a response to the COVID-19 pandemic the EU adopted Regulation No 2020/873 of the European Parliament and of the Council amending Regulations (EU) No 575/2013 and (EU) 2019/876. The Regulation introduced a new 5-year transitional period for the impairment losses that occurred due to the COVID-19 pandemic. According to the revised 473a article, institutions are allowed to fully add back to their CET 1 capital any increase in the expected credit loss provisions that they recognize in 2020 and 2021 for their financial assets that are not credit-impaired and new transitional factors introduced for the remaining period. The weighting factors were set at 1.00 for the first two years (2020 and 2021), 0.75 in 2022, 0.5 in 2023 and 0.25 in 2024.

Alpha Bank has decided to make use of Article 473a of the above Regulation and applies the transitional provisions for the calculation of Capital Adequacy on both a standalone and consolidated basis.

The following table shows a comparison of own funds and capital and leverage ratios with and without the application of the transitional arrangements for IFRS 9.

Template 3: EU IFRS9-FL - Comparison of own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS

(Amounts in millions of Euro)

	a	b	c	d	e
	30.6.2021	31.3.2021	31.12.2020	30.9.2020	30.6.2020
Available capital (amounts)					
Common Equity Tier 1 (CET1) capital	4,877	7,086	7,827	7,909	7,941
CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	3,962	6,171	6,554	6,564	6,592
Tier 1 capital	4,878	7,087	7,830	7,912	7,944
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	3,962	6,171	6,554	6,564	6,592
Total capital	5,892	8,100	8,342	8,424	8,456
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4,977	7,185	7,069	7,078	7,107
Risk-weighted assets (amounts)					
Total Risk-weighted assets	38,109	44,296	45,369	46,054	46,289
Total Risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	37,312	43,499	44,254	44,866	45,098
Capital ratios					
Common Equity Tier 1 ratio (%)	12.8%	16.0%	17.3%	17.2%	17.2%
CET1 ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	10.6%	14.2%	14.8%	14.6%	14.6%
Tier 1 ratio (%)	12.8%	16.0%	17.3%	17.2%	17.2%
Tier 1 ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	10.6%	14.2%	14.8%	14.6%	14.6%
Total ratio (%)	15.5%	18.3%	18.4%	18.3%	18.3%
Total ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	13.3%	16.5%	16.0%	15.8%	15.8%
Leverage ratio					
Leverage ratio total exposure measure	60,729	62,194	61,765	62,678	67,430
Leverage ratio	8.0%	11.4%	12.7%	12.6%	11.8%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6.6%	10.1%	10.8%	10.7%	9.9%

3.3 Reconciliation of regulatory own funds to the balance sheet according to IFRS

The table below highlights the difference in the basis of consolidation for accounting and prudential purposes as it compares the carrying values as reported under IFRS with the carrying values under the scope of the regulatory consolidation. References in the last column of the table provide the mapping of regulatory balance sheet items used to calculate regulatory capital. The reference-columns presented below provides the mapping to the references-columns as presented in the template “EU CC1–Composition of regulatory own funds”.

Template 4: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		30.6.2021		
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and balances with central banks	9,393	9,393	
2	Due from banks	3,266	3,266	
3	Trading securities	18	18	
4	Derivative financial assets	1,044	1,045	
5	Loans and advances to customers	37,500	37,499	
6	Investment securities			
	- Measured at fair value through other comprehensive income	6,677	6,091	
	- Measured at amortised cost	3,502	3,502	
	- Measured at fair value through profit or loss	178	96	
7	Investments in associates and joint ventures	61	164	
8	Investment property	552	552	
9	Property, plant and equipment	765	763	
10	Goodwill and other intangible assets	471	434	(a)
11	Deferred tax assets	5,298	5,298	(b)
12	Other assets	1,644	1,621	
13	Assets classified as held for sale	99	99	
14	Total assets	70,468	69,841	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Due to banks	14,320	14,320	
2	Derivative financial liabilities	1,392	1,392	
3	Due to customers	45,032	45,055	
4	Debt securities in issue and other borrowed funds	1,684	1,709	(c)
5	Liabilities for current income tax and other taxes	104	102	
6	Deferred tax liabilities	31	17	
7	Employee defined benefit obligations	88	88	
8	Other liabilities	970	973	
9	Provisions	815	236	
10	Liabilities related to assets classified as held for sale	0	0	



		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		30.6.2021		
11	Total liabilities	64,437	63,892	
Equity				
1	Share Capital	464	464	
2	Funds received in advance of share issue	77	77	
3	Share premium	10,803	10,803	
4	Reserves	438	377	
5	Retained earnings	-5,794	-5,814	
6	Non-controlling interests	29	29	
7	Hybrid securities	15	15	(d)
8	Total equity	6,031	5,949	

The following table presents the analysis of Own funds structure.

Template 5: Own Funds Structure

(Amounts in millions of Euro)

	30.6.2021	31.3.2021
Share capital	464	464
Share premium	10,803	10,803
Retained Earnings and Other Reserves	(2,809)	(2,891)
<i>o/w FVOCI reserves</i>	111	106
Period results	(2,336)	(287)
Minority interest (transitional)	0	0
Common equity tier 1 capital before regulatory adjustments	6,122	8,089
PVA	(8)	(8)
Intangible assets	(314)	(380)
Adjustments due to IFRS 9 transitional adjustments	797	797
DTA amortization	(1,700)	(1,395)
Irrevocable payment commitment	(20)	(16)
Total regulatory adjustments to common equity tier 1	(1,245)	(1,002)
Common equity tier 1 capital (CET1) (1)	4,877	7,086
Hybrid instruments	15	15
Additional Tier I before regulatory adjustments	15	15
Hybrid instruments transitional	(13)	(13)
(-) Goodwill/Intangible investments	-	-
<i>of which deductible from Additional Tier I</i>	(13)	(13)
<i>of which deductible from CET1</i>	-	-
Total regulatory adjustments to additional Tier I	(13)	(13)
Additional Tier I	1	1
Tier I Capital (CET1 + AT1)	4,878	7,087
Subordinated loan	1,000	1,000
Hybrid instruments (transitional)	13	13
Tier II capital before regulatory adjustments	1,013	1,013
Total regulatory adjustments to Tier II	-	-
Tier II capital	1,013	1,013
Total Capital (TC = Tier I + Tier II)	5,892	8,100
Total RWA	38,109	44,296
Common equity tier 1 Ratio	12.8%	16.0%
Tier I Ratio	12.8%	16.0%
Capital Adequacy Ratio (Tier I + Tier II)	15.5%	18.3%



3.4 Capital requirements under Pillar I

The Group calculates and reports to the designated authorities its capital requirements (Pillar I RWAs) according to the provisions of the CRR and implementing the Technical Standards developed by the EBA on a solo and consolidated basis.

The approaches adopted for the calculation of the capital requirements under Pillar I (advanced or standardized methodologies) are determined by the general 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 are calculated using the following approaches:

- **Credit Risk:** The Group follows the Standardized Approach (STA). The advanced method is used for the valuation of financial collateral.
- **Operational Risk:** The Group follows the Standardized Approach (STA).
- **Market Risk:** 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.

The following template summarizes RWA and minimum capital requirements by risk type. Minimum capital requirement is calculated at 8% of RWA.

**Template 6: EU OV1 – Overview of risk weighted exposure amounts**

(Amounts in millions of Euro)

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		30.6.2021	31.3.2021	30.6.2021
1	Credit risk (excluding CCR)	32,899	39,201	2,632
2	Of which the standardised approach	32,899	39,201	2,632
3	Of which the foundation IRB (FIRB) approach		-	
4	Of which slotting approach			-
EU 4a	Of which equities under the simple riskweighted approach			-
5	Of which the advanced IRB (AIRB) approach	-	-	-
6	Counterparty credit risk - CCR	337	339	27
7	Of which the standardised approach	206	161	17
8	Of which internal model method (IMM)	-		-
EU 8a	Of which exposures to a CCP	1	2	0
EU 8b	Of which credit valuation adjustment - CVA	21	51	2
9	Of which other CCR	109	125	9
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	310	127	25
17	Of which SEC-IRBA approach			-
18	Of which SEC-ERBA (including IAA)			-
19	Of which SEC-SA approach			-
EU 19a	Of which 1250%/ deduction			-
20	Position, foreign exchange and commodities risks (Market risk)	1,358	1,423	109
21	Of which the standardised approach	22	30	2
22	Of which IMA	1,336	1,394	107
EU 22a	Large exposures	-	-	-
23	Operational risk	3,205	3,205	256
EU 23a	Of which basic indicator approach	-	-	-
EU 23b	Of which standardised approach	3,205	3,205	256
EU 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	1,494	2,101	119
29	Total	38,109	44,296	3,049

As of 30.6.2021 the total risk weighted assets reduced by Euro 6.2billion or 14.0% compared to the previous quarter, amounting to Euro 38.1billion versus Euro 44.3billion as of 31.3.2021.

The decrease is mainly driven by the derecognition of the Galaxy loan portfolio .Out of the total amount, credit risk weighted assets (incl. CCR and amounts below the thresholds for deduction) represent approximately 88.0%.



3.5 Capital Buffers

The countercyclical capital buffer (CCyB) is a CRD IV instrument, designed to help counter pro-cyclicality in the financial system. Credit institutions are required to set aside additional CET 1 capital during periods of excessive credit growth. This will help maintain the supply of credit and dampen the downswing of the financial cycle. The main purpose of the CCyB is to increase the banks' resilience in good times to absorb potential losses that could arise in a downturn and to support the continued supply of credit to the real economy. For 2021 Bank of Greece, as National Competent Authority, set the countercyclical buffer at 0%. CCyB is also set at currently 0% in all other countries in which Alpha Bank has significant exposures. Total Risk exposure amount in the following tables includes General Credit (excluding CCR) and Securitization exposures.

Template 7a: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 30.6.2021

(Amounts in millions of Euro)

	a	b	c		e	f	g			j	k	l	m	
			Relevant credit exposures – Market risk				Own fund requirements							
			General credit exposures	Sum of long and short positions of trading book exposures for SA			Value of trading book exposures for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value					Relevant credit risk exposures - Credit risk
010	Breakdown by country:													
	Bulgaria	88	-	-	-	-	88	6	-	-	6	72	0%	0.5%
	Luxembourg	334	-	-	-	-	334	3	-	-	3	37	0%	0.5%
	Norway	2	-	-	-	-	2	0	-	-	0	1	0%	1%
	Other	38,513	-	-	-	3,774	42,287	2,075	-	25	2,100	26,249	100%	
020	Total	38,937	-	-	-	3,774	42,711	2,084	-	25	2,109	26,360	100%	

Template 7b: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 31.12.2020

(Amounts in millions of Euro)

	a	b	c		d	e	f	g			h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)			
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total						
010	Breakdown by country:															
	Bulgaria	55						3					3		0%	0.5%
	Luxembourg	40						3					3		0%	0.25%
	Norway	1						0					0		0%	1%
	Other	44,662				11		2,707				10	2,717		100%	
020	Total	44,759				11		2,714				10	2,724		100%	



The following table presents an overview of institution - specific countercyclical exposure and buffer requirements.

Template 8a: EU CCyB2 - Amount of institution-specific countercyclical capital buffer

(Amounts in millions of Euro)

		a
		30.6.2021
1	Total risk exposure amount	38,109
2	Institution specific countercyclical capital buffer rate	0.00%
3	Institution specific countercyclical capital buffer requirement	0.8

Template 8b: EU CCyB2 - Amount of institution-specific countercyclical capital buffer

(Amounts in millions of Euro)

		a
		31.12.2020
1	Total risk exposure amount	45,369
2	Institution specific countercyclical capital buffer rate	0.00%
3	Institution specific countercyclical capital buffer requirement	0.4



4 Leverage

The leverage ratio, which is defined as Tier 1 capital divided by total exposure, is a binding requirement with the application of the CRR II package, as of June 2021. The “risk of excessive leverage” means the risk that results from an institution's vulnerability due to leverage or contingent leverage that may require unintended corrective measures to its business plan, including distressed selling of assets which might result in losses or in valuation adjustments to its remaining assets.

The level of the leverage ratio with reference date 30.6.2021 on consolidated basis was 8.0%, according to the transitional definition of Tier 1 capital, exceeding by 2,6x the 3% minimum threshold applied by the competent authorities, implying that the Bank is not taking on excessive leverage risk.

The Bank submits to the regulatory authorities the leverage ratio on a quarterly basis and monitors the level and the factors that affect the ratio.

The table below provides a reconciliation of the total exposure measure with the total assets disclosed in published financial statements.

Template 9a: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 30.6.2021

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	70,468
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(627)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	(9,007)
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	253
9	Adjustment for securities financing transactions (SFTs)	218
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	1,361
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(1,937)
13	Total exposure measure	60,730



Template 9b: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 31.12.2020

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	70,057
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(579)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	(7,077)
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	(161)
9	Adjustment for securities financing transactions (SFTs)	62
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	1,429
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(1,966)
13	Total exposure measure	61,765

The following template presents a breakdown of the components of the leverage exposure, the minimum requirements and buffers.



Template 10: EU LR2 - LRCom: Leverage ratio common disclosure

(Amounts in millions of Euro)

		CRR leverage ratio exposures	
		a	b
		30.6.2021	31.12.2020
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	56,933	59,405
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	19	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(1,125)	(1,582)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	784	1,104
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	56,611	58,927
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	1,153	883
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	163	224
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original exposure method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	1,316	1,107
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1,224	240
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	218	63
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures	1,442	303
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	7,554	7,964
20	(Adjustments for conversion to credit equivalent amounts)	(6,192)	(6,535)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	Off-balance sheet exposures	1,361	1,429
Excluded exposures			
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-



		CRR leverage ratio exposures	
		a	b
		30.6.2021	31.12.2020
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
Capital and total exposure measure			
23	Tier 1 capital	4,878	7,830
24	Total exposure measure	60,730	61,765
Leverage ratio			
25	Leverage ratio	8.03%	12.68%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8.03%	12.68%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	7.00%	11.37%
26	Regulatory minimum leverage ratio requirement (%)	3.44%	3.34%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.44%	3.34%
Choice on transitional arrangements and relevant exposures			
EU-27	Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional



Template 11a: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 30.6.2021

(Amounts in millions of Euro)

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	55,827
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	55,827
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	10,943
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	655
EU-7	Institutions	2,811
EU-8	Secured by mortgages of immovable properties	13,965
EU-9	Retail exposures	3,750
EU-10	Corporates	10,889
EU-11	Exposures in default	5,688
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	7,125

Template 11b: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 31.12.2020

(Amounts in millions of Euro)

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	57,823
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	57,823
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	11,934
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	1,213
EU-7	Institutions	3,187
EU-8	Secured by mortgages of immovable properties	13,996
EU-9	Retail exposures	3,860
EU-10	Corporates	10,264
EU-11	Exposures in default	11,616
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	1,752

5 Credit Risk

Credit risk arises from the potential weakness of borrowers or counterparties to repay their debts as they arise from their loan obligations to the Group. The primary objective of the Group's strategy for the credit risk management in order to achieve the maximization of the adjusted return relative to the performance risk is the continuous, timely and systematic monitoring of the loan portfolio and the maintenance of the credit risks within the framework of acceptable overall risk limits. 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.

In order to effectively manage credit risk, the Group has developed specific methodologies and credit risk measurement systems in accordance with regulatory and Basel III requirements while incorporating banking industry best practices. These methodologies and systems are continuously evolving to provide the Business Units with timely and effective support in the decision-making process and to avoid possible adverse consequences for the Group.

The Group identifies and assesses existing and potential risks inherent in any product or activity as the basis for effective credit risk management.

The table below presents the net credit exposures by maturities.

Template 12a: EU CR1-A: Maturity of exposures as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	231	5,634	17,255	14,380	-	37,500
2	Debt securities	-	1,389	3,443	4,764	-	9,596
3	Total	231	7,023	20,699	19,143	-	47,096

The following tables show the total exposure amounts broken down by significant industry of counterparty as of 30.6.2021 and 31.12.2020.

Template 13a: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 30.6.2021

(Amounts in millions of Euro)

		a	c	e	f
		Gross carrying amount	Of which defaulted	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	Agriculture, forestry and fishing	344	88	(59)	-
020	Mining and quarrying	85	28	(17)	-
030	Manufacturing	4,216	873	(462)	-
040	Electricity, gas, steam and air conditioning supply	1,052	4	(4)	-
050	Water supply	43	3	(2)	-
060	Construction	2,134	966	(657)	-
070	Wholesale and retail trade	4,867	1,705	(873)	(23)
080	Transport and storage	3,409	344	(106)	(68)
090	Accommodation and food service activities	2,318	299	(101)	-
100	Information and communication	239	65	(36)	-
110	Financial and insurance activities	-	-	-	-
120	Real estate activities	1,672	364	(121)	(24)
130	Professional, scientific and technical activities	472	47	(24)	-
140	Administrative and support service activities	407	60	(35)	-
150	Public administration and defense, compulsory social security	3	0	(0)	-
160	Education	82	31	(11)	-
170	Human health services and social work activities	231	25	(15)	-
180	Arts, entertainment and recreation	255	68	(50)	-
190	Other services	437	105	(103)	(0)
200	Total	22,266	5,074	(2,674)	(115)



Template 13b: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 31.12.2020

(Amounts in millions of Euro)

	a	c	e	f	
	Gross carrying amount	Of which defaulted	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures	
010	Agriculture, forestry and fishing	488	238	(98)	-
020	Mining and quarrying	109	51	(32)	-
030	Manufacturing	5,364	2,087	(1,083)	-
040	Electricity, gas, steam and air conditioning supply	1,228	7	(9)	-
050	Water supply	45	8	(5)	-
060	Construction	2,513	1,374	(791)	-
070	Wholesale and retail trade	6,548	3,435	(1,786)	(19)
080	Transport and storage	3,235	445	(162)	(43)
090	Accommodation and food service activities	2,668	690	(261)	-
100	Information and communication	284	141	(80)	(1)
110	Financial and insurance activities	0	-	-	-
120	Real estate activities	1,817	472	(148)	(24)
130	Professional, scientific and technical activities	445	109	(53)	-
140	Administrative and support service activities	489	156	(85)	-
150	Public administration and defense, compulsory social security	1	0	(0)	-
160	Education	89	41	(14)	-
170	Human health services and social work activities	203	63	(36)	-
180	Arts, entertainment and recreation	326	137	(81)	-
190	Other services	547	196	(149)	(3)
200	Total	26,401	9,649	(4,872)	(90)

The tables below present the credit quality of the Group's exposures broken down by significant geographical area as of 30.6.2021 and 31.12.2020

Template 14a: EU CQ4: Quality of non-performing exposures by geography as of 30.6.2021

(Amounts in millions of Euro)

	a	c	e	f	g
	Gross carrying/nominal amount		Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which defaulted			
010 On-balance-sheet exposures	53,141	11,364	(5,948)		(116)
020 <i>Greece</i>	40,178	8,545	(4,175)		(40)
030 <i>United Kingdom</i>	1,594	699	(536)		-
040 <i>Romania</i>	2,976	186	(119)		(21)
050 <i>Cyprus</i>	2,628	1,523	(947)		-
070 <i>Other countries</i>	5,764	411	(172)		(55)
080 Off-balance-sheet exposures	7,628	347		48	
090 <i>Greece</i>	6,817	316		35	
100 <i>United Kingdom</i>	79	1		0	
110 <i>Romania</i>	472	17		5	
120 <i>Cyprus</i>	213	13		8	
140 <i>Other countries</i>	46	0		0	
150 Total	60,769	11,711	(5,948)	48	(116)

Template 14b: EU CQ4: Quality of non-performing exposures by geography as of 31.12.2020

(Amounts in millions of Euro)

		a	c	e	f	g
		Gross carrying/nominal amount		Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted			
010	On-balance-sheet exposures	68,359	20,971	(9,752)		(91)
020	<i>Greece</i>	52,091	18,010	(8,172)		(37)
030	<i>United Kingdom</i>	2,751	741	(471)		-
040	<i>Romania</i>	3,383	186	(126)		(21)
050	<i>Cyprus</i>	2,982	1,592	(806)		-
070	<i>Other countries</i>	7,151	443	(177)		(33)
080	Off-balance-sheet exposures	7,970	336		91	
090	<i>Greece</i>	7,172	319		78	
100	<i>United Kingdom</i>	54	3		0	
110	<i>Romania</i>	494	4		5	
120	<i>Cyprus</i>	209	10		8	
140	<i>Other countries</i>	41	0		0	
150	Total	76,329	21,308	(9,752)	91	(91)

Amounts shown by country in this table are based on the country of residence of the counterparty.

The following tables provide an overview of the credit quality of forborne exposures.

Template 15a: EU CQ1: Credit quality of forborne exposures as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d	e		f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures		
		Performing forborne	Non-performing forborne		Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-	-
010	Loans and advances	4,261	7,678	7,678	7,497	(205)	(3,444)	6,758	3,465	
020	Central banks	-	-	-	-	-	-	-	-	
030	General governments	0	1	1	1	(0)	(0)	0	0	
040	Credit institutions	-	-	-	-	-	-	-	-	
050	Other financial corporations	2	4	4	4	(0)	(2)	2	1	
060	Non-financial corporations	1,329	2,988	2,988	2,808	(48)	(1,309)	2,420	1,440	
070	Households	2,930	4,686	4,686	4,686	(158)	(2,133)	4,336	2,023	
080	Debt Securities	-	-	-	-	-	-	-	-	
090	Loan commitments given	4	1	1	1	0	0	0	0	
100	Total	4,265	7,678	7,678	7,498	(205)	(3,444)	6,759	3,465	

Template 15b: EU CQ1: Credit quality of forborne exposures as of 31.12.2020

(Amounts in millions of Euro)

		a	b	c	d	e		f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures		
		Performing forborne	Non-performing forborne		Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-	-
010	Loans and advances	4,038	12,708	12,708	12,526	(293)	(4,874)	9,496	6,458	
020	Central banks	-	-	-	-	-	-	-	-	
030	General governments	-	1	1	1	-	(0)	0	0	
040	Credit institutions	-	-	-	-	-	-	-	-	
050	Other financial corporations	2	7	7	7	(0)	(3)	5	4	
060	Non-financial corporations	1,075	5,169	5,169	4,986	(67)	(2,118)	3,256	2,486	
070	Households	2,960	7,531	7,531	7,531	(227)	(2,753)	6,235	3,968	
080	Debt Securities	-	-	-	-	-	-	-	-	
090	Loan commitments given	9	3	3	3	0	-	0	0	
100	Total	4,046	12,711	12,711	12,529	(293)	(4,874)	9,497	6,458	

Template 16a: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
005	Cash balances at central banks and other demand deposits	12,274	12,274	-	70	-	-	-	-	-	-	70	70
010	Loans and advances	32,168	31,996	172	11,364	4,085	606	464	846	2,136	715	2,513	11,364
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	64	64	-	1	1	0	-	0	0	-	0	1
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	4,095	4,095	-	10	3	1	0	0	1	0	6	10
060	Non-financial corporations	17,192	17,151	41	5,074	2,165	192	114	306	707	253	1,338	5,074
070	Of which SMEs	7,343	7,303	40	3,193	1,182	110	86	133	446	140	1,096	3,193
080	Households	10,817	10,685	132	6,278	1,916	413	350	540	1,428	462	1,169	6,278
090	Debt securities	9,609	9,609	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	7,955	7,955	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	807	807	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	33	33	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	814	814	-	-	-	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	7,282			347								347
160	Central banks	-			-								-
170	General governments	192			-								-
180	Credit institutions	642			-								-
190	Other financial corporations	42			4								4
200	Non-financial corporations	4,670			342								342
210	Households	1,735			1								1
220	Total	61,332	53,878	172	11,780	4,085	606	464	846	2,136	715	2,583	11,780

Template 16b: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 31.12.2020

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures				Non-performing exposures							
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
005	Cash balances at central banks and other demand deposits	9,819	9,819	-	70	-	-	-	-	-	-	70	70
010	Loans and advances	28,228	27,886	342	20,901	6,280	335	622	2,057	3,363	1,204	7,041	20,901
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	79	79	0	2	1	-	-	0	0	-	1	2
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	160	159	0	36	15	0	0	1	5	0	14	36
060	Non-financial corporations	16,752	16,707	45	9,649	3,207	125	288	868	1,295	416	3,451	9,649
070	Of which SMEs	7,125	7,107	18	6,784	1,923	104	87	455	739	288	3,187	6,784
080	Households	11,237	10,940	297	11,215	3,058	210	335	1,187	2,062	788	3,575	11,215
090	Debt securities	9,341	9,341	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	7,950	7,950	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	689	689	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	15	15	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	686	686	-	-	-	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	7,634			336								336
160	Central banks	-			-								-
170	General governments	194			-								-
180	Credit institutions	623			-								-
190	Other financial corporations	52			4								4
200	Non-financial corporations	5,062			332								332
210	Households	1,703			1								1
220	Total	55,021	47,046	342	21,308	6,280	335	622	2,057	3,363	1,204	7,111	21,308

Template 17a: EU CR1: Performing and non-performing exposures and related provisions as of 30.6.2021

(Amounts in millions of Euro)

	a		b		c		D		e		f		g		h		i		j		k		l		m		n		o	
	Gross carrying amount/nominal amount								Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								Accumulated partial write-off		Collateral and financial guarantees received											
	Performing exposures				Non-performing exposures				Performing exposures – accumulated impairment and provisions				Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						On performing exposures	On non-performing exposures										
	Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3			Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3																
005	Cash balances at central banks and other demand deposits	12,274	12,274	-	70	-	70	(1)	(1)	-	(70)	-	(70)																	
010	Loans and advances	32,168	25,577	5,367	11,364	-	8,922	(414)	(125)	(231)	(5,619)	-	(4,412)	(5,292)	24,496	4,788														
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-														
030	General governments	64	64	1	1	-	1	(0)	(0)	(0)	(0)	-	(0)	(0)	56	1														
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-														
050	Other financial corporations	4,095	4,086	7	10	-	8	(2)	(1)	(0)	(7)	-	(6)	(10)	3,905	3														
060	Non-financial corporations	17,192	14,559	2,207	5,074	-	4,041	(189)	(106)	(72)	(2,601)	-	(2,009)	(3,511)	12,126	2,122														
070	Of which SMEs	7,343	6,033	1,186	3,193	-	2,642	(66)	(18)	(42)	(1,660)	-	(1,315)	(2,096)	5,015	1,282														
080	Households	10,817	6,869	3,152	6,278	-	4,872	(223)	(18)	(159)	(3,011)	-	(2,396)	(1,771)	8,409	2,663														
090	Debt securities	9,609	9,554	24	-	-	-	(31)	(31)	(0)	-	-	-	-	-	-														
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-														
110	General governments	7,955	7,955	-	-	-	-	(17)	(17)	-	-	-	-	-	-	-														
120	Credit institutions	807	805	-	-	-	-	(11)	(11)	-	-	-	-	-	-	-														
130	Other financial corporations	33	5	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-														
140	Non-financial corporations	814	790	24	-	-	-	(3)	(3)	(0)	-	-	-	-	-	-														
150	Off-balance-sheet exposures	7,282	6,889	391	347	-	347	(13)	(5)	(8)	(35)	-	(35)																	
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-														
170	General governments	192	192	1	-	-	-	(0)	(0)	(0)	-	-	-	-	0	-														
180	Credit institutions	642	641	1	-	-	-	(1)	(1)	(0)	-	-	-	-	-	-														
190	Other financial corporations	42	42	0	4	-	4	(0)	(0)	(0)	(0)	-	(0)																	
200	Non-financial corporations	4,670	4,339	331	342	-	342	(11)	(3)	(8)	(35)	-	(35)																	
210	Households	1,735	1,676	59	1	-	0	(1)	(1)	(0)	(0)	-	(0)																	
220	Total	61,332	54,294	5,782	11,780	-	9,339	(459)	(161)	(239)	(5,724)	-	(4,517)	(5,292)	25,602	4,851														

Template 17b: EU CR1: Performing and non-performing exposures and related provisions as of 31.12.2020

(Amounts in millions of Euro)

		a		b		c		D		e		f		g		h		i		j		k		l		m		n		o	
		Gross carrying amount/nominal amount								Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								Accumulated partial write-off		Collateral and financial guarantees received											
		Performing exposures				Non-performing exposures				Performing exposures – accumulated impairment and provisions				Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions																	
		Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3			Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3			On performing exposures	On non-performing exposures												
005	Cash balances at central banks and other demand deposits	9,819	9,819	-	70	-	70	(0)	(0)	-	(70)	-	(70)																		
010	Loans and advances	28,228	20,810	7,237	20,901	-	20,671	(562)	(143)	(419)	(9,187)	-	(9,096)	(11,419)														20,552	9,951		
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
030	General governments	79	79	0	2	-	2	(0)	(0)	(0)	(1)	-	(1)	(1)													72	1			
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
050	Other financial corporations	160	149	10	36	-	36	(2)	(1)	(0)	(16)	-	(16)	(101)													81	18			
060	Non-financial corporations	16,752	13,744	2,826	9,649	-	9,419	(239)	(119)	(120)	(4,724)	-	(4,634)	(7,780)													11,809	4,088			
070	Of which SMEs	7,125	5,587	1,538	6,784	-	6,758	(104)	(23)	(81)	(3,448)	-	(3,427)	(5,640)													4,891	2,735			
080	Households	11,237	6,838	4,400	11,215	-	11,214	(321)	(22)	(299)	(4,446)	-	(4,446)	(3,537)													8,590	5,845			
090	Debt securities	9,341	9,300	28	-	-	-	(23)	(23)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
110	General governments	7,950	7,950	-	-	-	-	(16)	(16)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
120	Credit institutions	689	687	-	-	-	-	(5)	(5)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
130	Other financial corporations	15	5	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
140	Non-financial corporations	686	657	28	-	-	-	(3)	(2)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
150	Off-balance-sheet exposures	7,634	7,150	484	336	-	336	(17)	(8)	(9)	(75)	-	(75)														1,252	59			
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
170	General governments	194	194	0	-	-	-	(0)	(0)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-			
180	Credit institutions	623	608	15	-	-	-	(1)	(1)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
190	Other financial corporations	52	51	0	4	-	4	0	0	0	(0)	-	(0)														3	0			
200	Non-financial corporations	5,062	4,643	419	332	-	332	(15)	(6)	(9)	(74)	-	(74)														1,222	59			
210	Households	1,703	1,653	50	1	-	1	(1)	1	0	0	-	0														28	0			
220	Total	55,021	47,079	7,749	21,308	-	21,078	(602)	(173)	(429)	(9,331)	-	(9,241)	(11,419)													21,805	10,010			

The reported amounts for Stage 2 and Stage 3 as at 31.12.2020 are not comparable to those of 30.6.2021 as the latter do not include POCI exposures according to the amended supervisory reporting requirements.



Templates 18a and 18b show the changes in stock of non-performing loans and advances.

Template 18a: EU CR2: Changes in the stock of non-performing loans and advances as of 30.6.2021

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	20,901
020	Inflows to non-performing portfolios	1,723
030	Outflows from non-performing portfolios	(11,260)
040	Outflows due to write-offs	(251)
050	Outflow due to other situations	(11,009)
060	Final stock of non-performing loans and advances	11,364

Template 18b: EU CR2: Changes in the stock of non-performing loans and advances as of 31.12.2020

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	21,827
020	Inflows to non-performing portfolios	2,018
030	Outflows from non-performing portfolios	(2,944)
040	Outflows due to write-offs	(709)
050	Outflow due to other situations	(2,235)
060	Final stock of non-performing loans and advances	20,901

Under the Standardised Approach, credit risk is measured by applying risk weights outlined in CRD IV, based on the exposure class to which the exposure is allocated. The following tables outline the Standardised exposure classes by CRD IV prescribed risk weight. Exposures subject to counterparty credit risk are not included in the table.

Template 19a EU CR5: Standardised approach as of 30.6.2021

(Amounts in millions of Euro)

	Exposure classes	Risk weight														Total	Of which unrated	
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%			Others
		a	b	c	d	e	f	g	h	i	j	k	l	m	n			o
1	Central governments or central banks	17,685	-	-	-	12	-	-	-	-	3,125	-	504	-	-	-	21,326	
2	Regional government or local authorities	-	-	-	-	11	-	-	-	-	-	-	-	-	-	-	11	
3	Public sector entities	1,036	-	-	-	0	-	-	-	645	-	-	-	-	-	-	1,680	
4	Multilateral development banks	404	-	-	-	-	-	-	-	-	-	-	-	-	-	-	404	
5	International organisations	209	-	-	-	-	-	-	-	-	-	-	-	-	-	-	209	
6	Institutions	1,198	-	-	-	728	-	483	-	37	163	-	-	-	-	-	2,610	
7	Corporates	-	-	-	-	10	-	79	-	10,141	75	-	-	-	-	-	10,305	
8	Retail exposures	-	-	-	-	-	-	-	-	3,155	-	-	-	-	-	-	3,155	
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	7,346	4,018	-	1,151	1,253	-	-	-	-	-	13,768	
10	Exposures in default	-	-	-	-	-	-	-	-	4,683	833	-	-	-	-	-	5,516	
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	176	-	-	-	-	-	176	
12	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Units or shares in collective investment undertakings	0	-	-	-	-	-	-	-	7	-	-	-	-	-	-	7	
15	Equity exposures	-	-	-	-	-	-	-	-	233	-	94	-	-	-	-	327	
16	Other items	410	-	-	-	-	-	-	-	3,042	-	-	-	-	-	-	3,452	
17	TOTAL	20,942	-	-	-	761	7,346	4,580	-	4,306	23,165	1,247	597	-	-	-	62,944	

Template 19b: EU CR5: Standardised approach as of 31.12.2020

(Amounts in millions of Euro)

	Exposure classes	Risk weight															Total	Of which unrated	
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others			
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o			p
1	Central governments or central banks	15,605	-	-	-	3	-	0	-	-	3,169	-	800	-	-	-	-	19,577	
2	Regional government or local authorities	-	-	-	-	27	-	-	-	-	-	-	-	-	-	-	-	27	
3	Public sector entities	799	-	-	-	0	-	-	-	-	636	-	-	-	-	-	-	1,435	
4	Multilateral development banks	428	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	428	
5	International organisations	341	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	341	
6	Institutions	51	-	-	-	817	-	390	-	-	57	62	-	-	-	-	-	1,377	
7	Corporates	-	-	-	-	-	-	61	-	-	9,791	48	-	-	-	-	-	9,900	
8	Retail exposures	-	-	-	-	-	-	-	-	3,360	-	-	-	-	-	-	-	3,360	
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	7,295	4,117	-	1,239	1,128	-	-	-	-	-	-	13,778	
10	Exposures in default	-	-	-	-	-	-	-	-	-	10,294	1,162	-	-	-	-	-	11,456	
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	200	-	-	-	-	-	200	
12	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	7	
15	Equity exposures	-	-	-	-	-	-	-	-	-	192	-	68	-	-	-	-	260	
16	Other items	410	-	-	-	-	-	-	-	-	3,550	-	-	-	-	-	-	3,960	
17	TOTAL	17,634	-	-	-	848	7,295	4,567	-	4,599	28,824	1,471	868	-	-	-	-	66,106	



5.1 Credit risk mitigation

Credit risk mitigation techniques reduce exposure value and expected loss. According to CRR 575/2013, only specific types of credit risk mitigation are eligible for capital adequacy calculation purposes.

Moreover, the Bank of Greece sets additional criteria which should be satisfied during the collateral management process (market value monitoring, insurance, legal validity) and the terms and conditions of the relevant agreements.

Collateral can be used in order to mitigate the credit risk created in case a customer or counterparty to a financial instrument fails to meet their contractual obligations.

Collaterals are holdings or rights of every type provided to the Bank by its debtors or third parties to be used as additional funding sources in case of claim liquidation.

The main collateral types are mortgages, cash, mutual funds and sovereign securities (repos, bonds).

5.1.1 Description of the main collateral types

Collateral used to mitigate risk, both for mortgage and other lending is diversified. The main types of guarantors are corporates, individuals, financial institutions and sovereigns. Their creditworthiness is assessed on a case by-case basis.

There are two broad categories of collateral: Contractual collaterals – guarantees and tangible collaterals.

Guarantees are the most common collateral type of the first category. A guarantee is a legally enforceable relationship between the Bank and the borrower, through which the guarantor assumes the responsibility of paying the debt. It is documented and presupposes the existence of another legally enforceable relationship between the Bank and the borrower (loan).

The most common types of tangible collateral are mortgages on real estate properties and pledges on commodities, deposits and cheques or claims and receivables.



The table below covers all CRM techniques recognised under the applicable accounting framework regardless of whether these techniques are recognised under CRR.

Template 20a: EU CR3: CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 30.6.2021

(Amounts in millions of Euro)

		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives	
		a				b
1	Loans and advances	26,592	29,284	22,761	6,522	-
2	Debt securities	9,609	-	-	-	-
3	Total	36,201	29,284	22,761	6,522	-
4	<i>Of which non-performing exposures</i>	6,576	4,788	4,478	309	-
EU-5	<i>Of which defaulted</i>	6,576	4,788			

Based on relevant guidelines, the unsecured carrying amount is calculated by subtracting the amount of collateral/ financial guarantees (capped at the net carrying amount of exposures) from the gross carrying amount of the exposure. This results in an overestimation of unsecured exposures in the sense that it does not consider both accumulated provisions and also any collateral in excess of the carrying amount. Consequently, secured exposures are underestimated.



Template 20b: EU CR3: CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 31.12.2020

(Amounts in millions of Euro)

		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives	
		a				b
1	Loans and advances	28,515	30,503	27,905	2,598	
2	Debt securities	9,341	-	-	-	
3	Total	37,856	30,503	27,905	2,598	
4	<i>Of which non-performing exposures</i>	10,950	9,951	9,642	309	
EU-5	<i>Of which defaulted</i>	10,950	9,951			

Based on relevant guidelines, the unsecured carrying amount is calculated by subtracting the amount of collateral/ financial guarantees (capped at the net carrying amount of exposures) from the gross carrying amount of the exposure. This results in an overestimation of unsecured exposures in the sense that it does not consider both accumulated provisions and also any collateral in excess of the carrying amount. Consequently, secured exposures are underestimated.



The tables below present Standardised exposures before Credit Conversion Factor (CCF) and Credit Risk Mitigation (CRM) and after CCF and CRM at 30.6.2021 and 31.12.2020, excluding exposures subject to counterparty credit risk.

Template 21a: EU CR4 – Standardised approach – Credit risk exposure and CRM effects as of 30.6.2021

(Amounts in millions of Euro)

	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	20,761	190	21,326	-	4,386	20.57%
2	Regional government or local authorities	11	1	11	0	2	20.00%
3	Public sector entities	644	4	1,680	1	645	38.38%
4	Multilateral development banks	105	-	404	0	-	0.00%
5	International organisations	209	-	209	-	-	0.00%
6	Institutions	2,811	573	2,608	1	669	25.63%
7	Corporates	10,889	3,462	9,690	615	9,214	89.41%
8	Retail	3,750	2,959	3,012	143	2,153	68.26%
9	Secured by mortgages on immovable property	13,965	84	13,737	31	6,116	44.42%
10	Exposures in default	5,688	281	5,441	75	5,933	107.55%
11	Exposures associated with particularly high risk	198	-	176	-	264	150.00%
12	Covered bonds	-	-	-	-	-	0.00%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0.00%
14	Collective investment undertakings	7	-	7	-	7	98.01%
15	Equity	327	-	327	-	467	143.03%
16	Other items	3,452	1	3,452	-	3,042	88.11%
17	TOTAL	62,817	7,554	62,079	865	32,899	52.27%



Template 21b: EU CR4 – Standardised approach – Credit risk exposure and CRM effects as of 31.12.2020

(Amounts in millions of Euro)

	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	19,011	191	19,577	0	5,171	26%
2	Regional government or local authorities	27	1	27	0	5	20%
3	Public sector entities	635	3	1,434	1	636	44%
4	Multilateral development banks	210	-	428	-	-	0%
5	International organisations	341	-	341	-	-	0%
6	Institutions	3,187	616	1,366	11	508	37%
7	Corporates	10,264	3,798	9,226	674	8,922	90%
8	Retail	3,860	2,900	3,276	84	2,346	70%
9	Secured by mortgages on immovable property	13,996	119	13,743	35	6,193	45%
10	Exposures in default	11,616	250	11,389	67	12,037	105%
11	Exposures associated with particularly high risk	222	-	200	-	299	150%
12	Covered bonds	-	-	-	-	-	0%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
14	Collective investment undertakings	7	-	7	-	7	100%
15	Equity	260	-	260	-	363	139%
16	Other items	3,960	-	3,960	-	3,550	90%
17	TOTAL	67,597	7,879	65,233	872	40,036	61%



The tables below provide information on the instruments that were cancelled in exchange for the collateral obtained by taking possession and on the value of the collateral obtained by taking possession as of 30.6.2021 and 31.12.2020.

Template 22a: EU CQ7: Collateral obtained by taking possession and execution processes as of 30.6.2021

(Amounts in millions of Euro)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	47	35
020	Other than PP&E	1,058	885
030	<i>Residential immovable property</i>	345	313
040	<i>Commercial Immovable property</i>	703	566
050	<i>Movable property (auto, shipping, etc.)</i>	0	0
060	<i>Equity and debt instruments</i>	11	5
070	<i>Other collateral</i>	-	-
080	Total	1,105	920

Template 22b: EU CQ7: Collateral obtained by taking possession and execution processes as of 31.12.2020

(Amounts in millions of Euro)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	48	35
020	Other than PP&E	1,137	910
030	<i>Residential immovable property</i>	333	301
040	<i>Commercial Immovable property</i>	798	603
050	<i>Movable property (auto, shipping, etc.)</i>	0	0
060	<i>Equity and debt instruments</i>	6	6
070	<i>Other collateral</i>	-	-
080	Total	1,185	946



5.2 Additional Credit Risk reporting to COVID-19

In response to the need to address negative economic consequences of COVID-19 pandemic, the European Union (EU) and Member States have introduced a wide range of mitigating measures to support the real economy and the financial sector.

On 2 April 2020, the EBA published Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis which clarifies a set of criteria and conditions under which such measures do not trigger forbearance classification of loans and advances, and sets out their further prudential treatment in this context.

The table below provides an overview of the credit quality of loans and advances subject to moratoria on loan repayments applied in the light of the COVID-19 crisis, in accordance with EBA/GL/2020/02:

Template 23a: COVID1: Information on loans and advances subject to legislative and non-legislative moratoria as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	D	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk							Gross carrying amount
		Performing			Non performing				Performing			Non performing				Inflows to non-performing exposures
Of which: exposures with forbearance measures	Of which: significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days			Of which: exposures with forbearance measures	Of which: significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days					
1	Loans and advances subject to moratorium	87	47	16	29	39	36	39	(8)	(2)	(1)	(2)	(6)	(6)	(6)	0
2	of which: Households	60	32	10	21	28	24	28	(5)	(1)	(1)	(1)	(4)	(4)	(4)	0
3	<i>of which: Collateralised by residential immovable property</i>	50	28	8	17	22	18	22	(3)	(0)	(0)	(0)	(2)	(2)	(2)	0
4	of which: Non-financial corporations	27	15	6	8	12	12	12	(3)	(1)	(0)	(0)	(2)	(2)	(2)	-
5	<i>of which: Small and Medium-sized Enterprises</i>	26	14	5	6	12	12	12	(3)	(0)	(0)	(0)	(2)	(2)	(2)	-
6	<i>of which: Collateralised by commercial immovable property</i>	19	12	5	6	7	7	7	(1)	(0)	(0)	(0)	(1)	(1)	(1)	-

The following table provides an overview of the volume of loans and advances subject to legislative and non-legislative moratoria in accordance with EBA/GL/2020/02 by residual maturity of these moratoria:

Template 24a: COVID2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria as of 30.6.2021

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i
	Number of obligors	Gross carrying amount							
		Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria					
				<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year	
Loans and advances for which moratorium was offered	186,503	10,690							
Loans and advances subject to moratorium (granted)	139,062	8,651	1,185	8,564	22	65	-	-	-
of which: Households		4,666	494	4,606	13	47	-	-	-
<i>of which: Collateralised by residential immovable property</i>		3,699	429	3,649	11	39	-	-	-
of which: Non-financial corporations		3,954	674	3,928	9	17	-	-	-
<i>of which: Small and Medium-sized Enterprises</i>		2,294	53	2,269	9	16	-	-	-
<i>of which: Collateralised by commercial immovable property</i>		2,487	591	2,468	7	12	-	-	-



Template 24b: COVID2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria as of 31.12.2020

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i
	Number of obligors	Gross carrying amount							
			Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria				
					<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
Loans and advances for which moratorium was offered	194,618	11,449							
Loans and advances subject to moratorium (granted)	148,716	9,411	1,164	9,411	-	-	-	-	-
of which: Households		5,113	512	5,113	-	-	-	-	-
<i>of which: Collateralised by residential immovable property</i>		4,065	442	4,065	-	-	-	-	-
of which: Non-financial corporations		4,266	636	4,266	-	-	-	-	-
<i>of which: Small and Medium-sized Enterprises</i>		2,627	62	2,627	-	-	-	-	-
<i>of which: Collateralised by commercial immovable property</i>		2,713	540	2,713	-	-	-	-	-

The table provides an overview of the stock of newly originated loans and advances subject to public guarantee schemes introduced in response to COVID-19 crisis:

Template 25a: COVID3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d
		Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
			of which: forborne	Public guarantees received	Inflows to non-performing exposures
1	Newly originated loans and advances subject to public guarantee schemes	1,358	-	1,092	3
2	of which: Households	-			-
3	of which: Collateralised by residential immovable property	-			-
4	of which: Non-financial corporations	1,355	-	1,089	3
5	of which: Small and Medium-sized Enterprises	1,005			3
6	of which: Collateralised by commercial immovable property	10			-

Template 25b: COVID3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis as of 31.12.2020

(Amounts in millions of Euro)

		a	b	c	d
		Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
			of which: forborne	Public guarantees received	Inflows to non-performing exposures
1	Newly originated loans and advances subject to public guarantee schemes	1,041	-	837	8
2	of which: Households	-			-
3	of which: Collateralised by residential immovable property	-			-
4	of which: Non-financial corporations	1,040	-	837	8
5	of which: Small and Medium-sized Enterprises	729			8
6	of which: Collateralised by commercial immovable property	5			-



6 Exposure to Securitisation positions

The amounts reported in the following two templates provide details of Group's securitization exposures separately for the regulatory non-trading and trading book.

The template EU SEC1 below presents the total non-trading book securitization exposure split by exposure type that is securitized as either originator or sponsor and finally positions which have been purchased through investment activities as investor.

Template 26: EU-SEC1 - Securitisation exposures in the non-trading book as of 30.6.2021

(Amounts in millions of Euro)

	a	b	c		D	e	f	g	h			i	j	k	l		m	n	o	
	Institution acts as originator							Institution acts as sponsor				Institution acts as investor								
	Traditional			Synthetic		Sub-total		Traditional		Synthetic		Sub-total		Traditional		Synthetic		Sub-total		
	STS		Non-STS		of which SRT		of which SRT		STS		Non-STS		Synthetic		STS		Non-STS		Synthetic	
	of which SRT		of which SRT		of which SRT		of which SRT		of which SRT		of which SRT		of which SRT		of which SRT		of which SRT		of which SRT	
1	Total exposures	-	-	20	20	-	-	20	-	-	-	-	-	-	-	11	-	11	-	-
2	Retail (total)	-	-	13	13	-	-	13	-	-	-	-	-	-	-	11	-	11	-	-
3	residential mortgage	-	-	13	13	-	-	13	-	-	-	-	-	-	-	11	-	11	-	-
4	credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	6	6	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-
8	loans to corporates	-	-	6	6	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Templates EU-SEC3 and EU-SEC4 include information on securitisation exposures in the non- trading book only with significant risk transfer

Template 27: EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor as of 30.6.2021

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/deductions
1	Total exposures																
2	-	-	-	20	-	-	-	20	-	-	-	180	-	-	-	14	-
3	Traditional transactions																
4	-	-	-	20	-	-	-	20	-	-	-	180	-	-	-	14	-
5	Securitisation																
6	-	-	-	13	-	-	-	13	-	-	-	136	-	-	-	11	-
7	Retail underlying																
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Of which STS																
10	-	-	-	6	-	-	-	6	-	-	-	44	-	-	-	4	-
11	Wholesale																
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Of which STS																
14	Re-securitisation																
15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Synthetic transactions																
17	Securitisation																
18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Retail underlying																
20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Wholesale																
22	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Re-securitisation																

Template 28: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 30.6.2021

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions
1	Total exposures																
2	-	-	-	11	-	-	11	-	-	-	130	-	-	-	10	-	-
3	Traditional securitisation																
4	-	-	-	11	-	-	11	-	-	-	130	-	-	-	10	-	-
5	Securitisation																
6	Retail underlying																
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Of which STS																
9	Wholesale																
10	Of which STS																
11	Re-securitisation																
12	Synthetic securitisation																
13	Securitisation																
14	Retail underlying																
15	Wholesale																
16	Re-securitisation																

Templates EU-SEC5 reflect the exposures in default and credit risk adjustments made during the period

Template 29: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 30.6.2021

(Amounts in millions of Euro)

		A	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
1	Total exposures	22,089	16,776	-
2	Retail (total)	17,832	13,634	-
3	residential mortgage	16,137	12,677	-
4	credit card	748	30	-
5	other retail exposures	947	928	-
6	re-securitisation	-	-	-
7	Wholesale (total)	4,257	3,142	-
8	loans to corporates	3,556	3,009	-
9	commercial mortgage	-	-	-
10	lease and receivables	475	133	-
11	other wholesale	227	-	-
12	re-securitisation	-	-	-



7 Counterparty credit risk (CCR)

Counterparty credit risk is the risk of default of a counterparty before the final settlement of all existing transactions' cash flows. An economic loss would occur if the portfolio of transactions with the counterparty has a positive economic value to the Group at the time of counterparty default. According to CRR 575/2013 the term transaction refers to:

- Over the counter (OTC) derivative transactions, such as FX or interest rate derivative transactions
- Repurchase transactions, securities or commodities lending or borrowing transactions or margin lending transactions
- Long settlement transactions

Alpha Bank Group has the first two types of transactions.

The exposures generating counterparty credit risk are monitored on a daily basis. The Group has set limits per counterparty group, per counterparty and per product.

In order to reduce counterparty credit risk exposure, Alpha Bank Group uses ISDA (International Swap and Derivatives Association) and GMRA (Global Master Repurchase Agreement) bilateral contracts for financial products transactions with financial institutions.

Since 30/06/2021 Alpha Bank Group has adopted the Standardised approach for counterparty credit risk (SA-CCR), the new methodology for calculating the EAD under CRR II, which is significantly different to its predecessor, the CEM under the CRR I. The SA-CCR is more risk sensitive compared to the prescribed approaches under CRR I, thus is expected to provide an EAD value which better reflects the risks to which Banks are exposed to as a result of derivative transactions.

The tables below present the Group's counterparty credit exposures, including the impact of netting and collateral. Current credit exposures consist of the replacement cost of contracts together with potential future credit exposure.

Template 30: EU CCR1 – Analysis of CCR by approach as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	163	144		1.4	431	431	431	207
2	IMM (for derivatives and SFTs)			-		-	-	-	-
2a	<i>Of which securities financing transactions netting sets</i>			-		-	-	-	-
2b	<i>Of which derivatives and long settlement transactions netting sets</i>			-		-	-	-	-
2c	<i>Of which from contractual cross-product netting sets</i>			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					1,430	-	-	-
5	VaR for SFTs					-	-	-	-
6	Total					1,861	431	431	207

According to CRR 575/2013 Article 381, financial institutions are required to calculate the own funds requirements for Credit Valuation Adjustment (CVA Risk).

The CVA reflects the current market value of the counterparty credit risk to the institution. Own Funds requirements for CVA risk, are calculated for all derivative transactions with financial institutions all OTC derivative instruments excluding credit derivatives.

In order to calculate CVA, Alpha Bank incorporates the Standardized methodology according to article 384 of CRR 575/2013.

The most important factors that influence the capital requirements of CVA are the Weight of the counterparty, the real notional-weighted maturity, the contribution of the exposures to the counterparties as well as the number of the counterparties of the portfolio.

The following tables present the CVA calculation of the Group:

Template 31a: EU CCR2 – Transactions subject to own funds requirements for CVA risk as of 30.6.2021

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method	-	-
2	(i) VaR component (including the 3× multiplier)		-
3	(ii) stressed VaR component (including the 3× multiplier)		-
4	Transactions subject to the Standardised method	26	21
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	Total transactions subject to own funds requirements for CVA risk	26	21

Template 31b: EU CCR2 – Transactions subject to own funds requirements for CVA risk as of 31.12.2020

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method		
2	(i) VaR component (including the 3× multiplier)		
3	(ii) stressed VaR component (including the 3× multiplier)		
4	Transactions subject to the Standardised method	56	55
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	Total transactions subject to own funds requirements for CVA risk	56	55

The tables below present the Group's exposures to central counterparties (CCPs) and related capital requirements.

**Template 32a: EU CCR8 – Exposures to CCPs as of 30.6.2021**

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		1
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	39	1
3	(i) OTC derivatives	39	1
4	(ii) Exchange-traded derivatives	-	-
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	-	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	Exposures to non-QCCPs (total)		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

Template 32b: EU CCR8 – Exposures to CCPs as of 31.12.2020

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		0
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	59	0
3	(i) OTC derivatives	59	0
4	(ii) Exchange-traded derivatives		
5	(iii) SFTs		
6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin		
8	Non-segregated initial margin		
9	Prefunded default fund contributions		
10	Unfunded default fund contributions		
11	Exposures to non-QCCPs (total)		0
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which		
13	(i) OTC derivatives		
14	(ii) Exchange-traded derivatives		
15	(iii) SFTs		
16	(iv) Netting sets where cross-product netting has been approved		
17	Segregated initial margin		
18	Non-segregated initial margin		
19	Prefunded default fund contributions		
20	Unfunded default fund contributions		

The tables below show the CCR exposures by regulatory portfolio and risk as of 30.6.2021 and 31.12.2020.

Template 33a: EU CCR3 – Standardised approach – CCR exposures by regulatory portfolio and risk as of 30.6.2021

(Amounts in millions of Euro)

	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
		Risk weight											Total exposure value
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1	Central governments or central banks	23	-	-	-	-	-	-	-	-	-	-	23
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	89	39	-	-	133	37	-	-	-	-	-	298
7	Corporates	-	-	-	-	-	-	-	-	321	-	-	321
8	Retail	-	-	-	-	-	-	-	7	-	-	-	7
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	0	-	-	0
11	Total exposure value	112	39	-	-	133	37	-	7	321	-	-	649

Template 33b: EU CCR3 – Standardised approach – CCR exposures by regulatory portfolio and risk as of 31.12.2020

(Amounts in millions of Euro)

	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
		Risk weight											Total exposure value
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1	Central governments or central banks	788	-	-	-	-	-	-	-	-	-	-	788
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	59	-	-	97	44	-	-	-	6	-	205
7	Corporates	-	-	-	-	-	-	-	-	250	-	-	250
8	Retail	-	-	-	-	-	-	-	1	-	-	-	1
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	Total exposure value	788	59	-	-	97	44	-	1	250	6	-	1,244

The following tables provide a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions or to securities financing transaction (SFTs) as of 30.6.2021 and 31.12.2020.

Template 34a: EU CCR5 – Composition of collateral for CCR exposures 30.6.2021

(Amounts in millions of Euro)

Collateral type	Collateral used in derivative transactions				Collateral used in SFTs				
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
1	Cash – domestic currency	28	2	174	1,045	-	4	-	973
2	Cash – other currencies	0	0	2	-	-	-	-	0
3	Domestic sovereign debt	-	900	-	-	-	600	-	-
4	Other sovereign debt	-	-	-	-	-	898	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	Total	28	902	176	1,045	-	1,503	-	973

Template 34b: EU CCR5 – Composition of collateral for CCR exposures as of 31.12.2020

(Amounts in millions of Euro)

Collateral type	Collateral used in derivative transactions				Collateral used in SFTs				
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
1	Cash – domestic currency	0	1	170	1,461	-	728	-	-
2	Cash – other currencies	-	-	-	-	-	-	-	-
3	Domestic sovereign debt	-	900	-	-	-	396	-	-
4	Other sovereign debt	-	-	-	-	-	40	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	Total	0	901	170	1,461	-	1,164	-	-

8 Market Risk

Market risk is the risk of reduction in economic value arising from unfavorable changes in the value or volatility of interest rates, foreign exchange rates, stock exchange indices, equities and commodities.

Market risk management is conducted in accordance with policies and procedures that have been developed and are implemented by all Group companies.

Alpha Bank calculates Value at Risk (VaR) for internal risk management purposes since 1999. The VaR methodology applied is historical simulation, using a 99% percentile, one tailed confidence interval, a historical observation period of 2 years un-weighted data and a 1 and 10-day holding period. 10 day VaR is calculated with a 10 day horizon and a 1 day fixed step (overlapping periods). Calculation of the value-at-risk value is performed on a daily basis using full valuation across all risk factors and positions. The Stressed VaR methodology is based on the current VaR methodology. All risk factors included in the regulatory VaR model are considered in the Stressed VaR model. The Bank computes the Stressed VaR measure on a daily basis, to coincide with the VaR periodicity. Currently, the stress period used by the Bank is January 2016 – December 2016. The selection of the stressed period is based on the assessment of the most volatile period in recent history.

8.1 IMA approach for market risk

The risk categories covered by Alpha Bank's regulatory internal model are general risk of equity instruments, general risk of debt instruments, foreign exchange risk and commodities risk.

The own fund requirements under the IMA at 30.06.2021 are displayed in the following table:

Template 35a: EU MR2-A: Market risk under the internal Model Approach (IMA) as of 30.6.2021

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	VaR (higher of values a and b)	454	36
(a)	Previous day's VaR (VaRt-1)		12
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		36
2	SVaR (higher of values a and b)	883	71
(a)	Latest available SVaR (SVaRt-1)		22
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		71
3	IRC (higher of values a and b)	-	-
(a)	Most recent IRC measure		-
(b)	12 weeks average IRC measure		-
4	Comprehensive risk measure (higher of values a, b and c)	-	-
(a)	Most recent risk measure of comprehensive risk measure		-
(b)	12 weeks average of comprehensive risk measure		-
(c)	Comprehensive risk measure Floor		-
5	Other	-	-
6	Total	1,336	107



Template 35b: EU MR2-A: Market risk under the internal Model Approach (IMA) as of 31.12.2020

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	VaR (higher of values a and b)	529	42
(a)	Previous day's VaR (VaRt-1)		11
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		42
2	SVaR (higher of values a and b)	1,030	82
(a)	Latest available SVaR (SVaRt-1)		21
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		82
3	IRC (higher of values a and b)	-	-
(a)	Most recent IRC measure		
(b)	12 weeks average IRC measure		
4	Comprehensive risk measure (higher of values a, b and c)	-	-
(a)	Most recent risk measure of comprehensive risk measure		
(b)	12 weeks average of comprehensive risk measure		
(c)	Comprehensive risk measure Floor		
5	Other	-	-
6	Total	1,559	125

A flow statement explaining the variations in the market RWAs is displayed in the following table:

Template 36a: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d	e	f	g
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
1	RWAs at previous period end	475	919	-	-	-	1,394	112
1a	Regulatory adjustment ⁽²⁾	332	660	-	-	-	993	79
1b	RWAs at the previous quarter-end (end of the day)	142	259	-	-	-	401	32
2	Movement in risk levels	7	15	-	-	-	22	2
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	1	3	-	-	-	4	0
8a	RWAs at the end of the disclosure period (end of the day)	150	277	-	-	-	427	34
8b	Regulatory adjustment ⁽²⁾	303	606	-	-	-	910	73
8	RWAs at the end of the disclosure period	454	883	-	-	-	1,336	107

Template 36b: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 31.3.2021

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
1	RWAs at previous period end						
	529	1,030	-	-	-	1,560	125
<i>1a</i>	<i>Regulatory adjustment ⁽²⁾</i>						
	395	769	-	-	-	1,164	93
<i>1b</i>	<i>RWAs at the previous quarter-end (end of the day)</i>						
	135	261	-	-	-	396	32
2	Movement in risk levels						
	6	7	-	-	-	13	1
3	Model updates/changes						
	(6)	(10)	-	-	-	(16)	(1)
4	Methodology and policy						
	-	-	-	-	-	-	-
5	Acquisitions and disposals						
	-	-	-	-	-	-	-
6	Foreign exchange movements						
	-	-	-	-	-	-	-
7	Other						
	8	-	-	-	-	8	1
<i>8a</i>	<i>RWAs at the end of the disclosure period (end of the day)</i>						
	142	259	-	-	-	401	32
<i>8b</i>	<i>Regulatory adjustment ⁽²⁾</i>						
	332	660	-	-	-	993	79
8	RWAs at the end of the disclosure period						
	475	919	-	-	-	1,394	112

⁽²⁾ The regulatory adjustment takes into account the Bank's multiplier in terms of the Internal Model which is embedded in the calculation of the RWAs.

VaR and SVaR values as estimated during the first semester of 2021 for the Bank trading portfolio, including the FX position due to participations, are given in the following table:

Template 37a: EU MR3 - IMA values for trading portfolios as of 30.6.2021

(Amounts in millions of Euro)

		a
		30.6.2021
VaR (10 day 99%)		
1	Maximum value	12
2	Average value	11
3	Minimum value	10
4	Period end	12
SVaR (10 day 99%)		
5	Maximum value	23
6	Average value	21
7	Minimum value	20
8	Period end	22
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (99.9%)		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

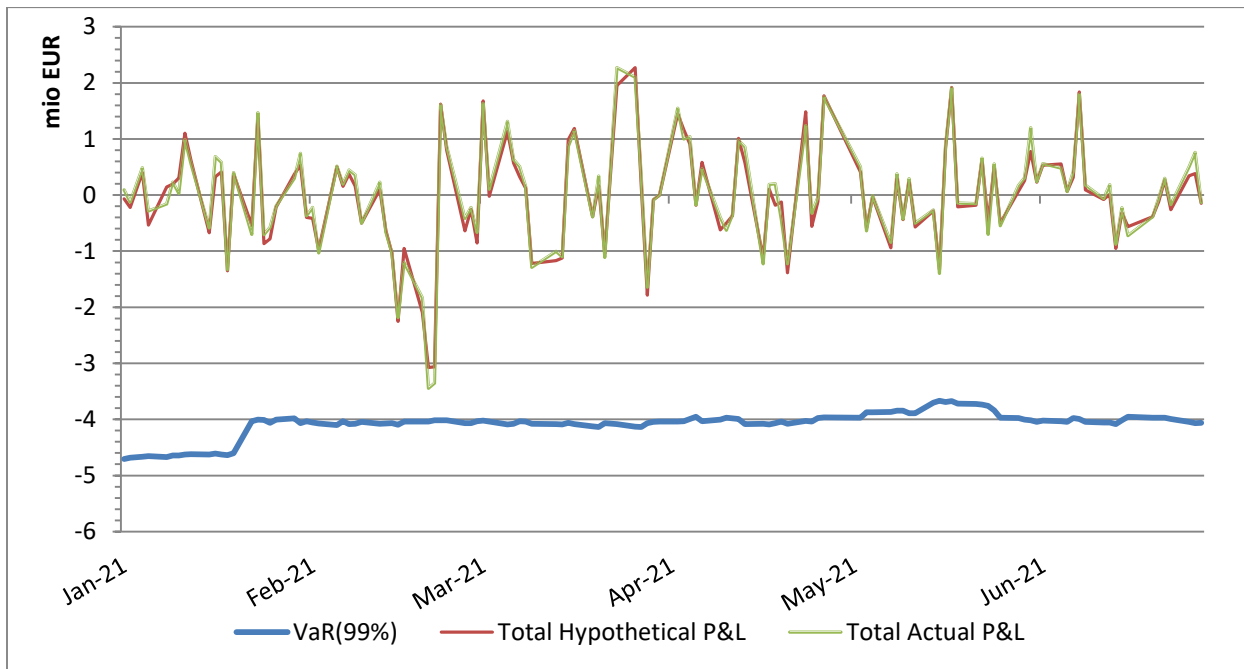
Template 37b: EU MR3 - IMA values for trading portfolios as of 31.12.2020

(Amounts in millions of Euro)

		a
		31.12.2020
VaR (10 day 99%)		
1	Maximum value	13
2	Average value	12
3	Minimum value	11
4	Period end	11
SVaR (10 day 99%)		
5	Maximum value	24
6	Average value	23
7	Minimum value	21
8	Period end	21
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (99.9%)		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

Additionally, VaR model validation (back testing) is performed on a daily basis. Both actual and hypothetical back testing is conducted in order to comply with the regulatory requirements. A comparison between the results of estimates from the regulatory VaR model with both hypothetical and actual trading outcomes is presented in the following graph:

Table 38: EU MR4 – Comparison of VaR estimates with gains/losses



Alpha Bank Group is in compliance with Bank of Greece requirements regarding the systems and controls through which the requirement for the provision of accurate and reliable valuation results is satisfied with, as described in Appendix VII of Directive 2591/20.8.2007.

8.2 Standardised approach for market risk

Capital charges for specific risk on a solo basis are calculated with the Standardized approach. Alpha Bank Group uses also the Standardized approach for the measurement of market risk exposure and capital requirements for all its subsidiaries.

The following table summarizes the Group's capital requirements for market risk per risk factor based on Standardized approach at 30.06.2021.

**Template 39a: EU MR1 - Market risk under the standardised approach as of 30.6.2021**

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	0
2	Equity risk (general and specific)	6
3	Foreign exchange risk	9
4	Commodity risk	7
	Options	
5	Simplified approach	-
6	Delta-plus approach	0
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	Total	22

Template 39b: EU MR1 - Market risk under the standardised approach as of 31.12.2020

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	-
2	Equity risk (general and specific)	5
3	Foreign exchange risk	2
4	Commodity risk	119
	Options	
5	Simplified approach	-
6	Delta-plus approach	0
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	Total	127



9 Liquidity Risk

Definition

Liquidity is the risk arising from the Group's inability to meet its obligations as they become due, or fund new business, without incurring substantial losses as well as the inability to manage unplanned contraction or changes in funding sources. Liquidity risk also arises from the Group's failure to recognize or address changes in market conditions that affect the ability to liquidate assets quickly and with minimal loss in value. Liquidity risk is also a Balance Sheet risk, since it may arise from banking book activities.

9.1 Liquidity Coverage Ratio (LCR)

The LCR refers to the proportion of the high-quality liquid assets held by financial institutions, to ensure their ability to meet their short-term net cash flows, over a 30-day stress period. The LCR became mandatory on 1 October 2015. The regulatory limit established is 100%.

The Bank monitors and reports the LCR on an individual and on consolidated basis. The LCR disclosures of the Pillar III report refer to the consolidated figures.

As of June 2021 the Group LCR stood at 169%. The liquidity buffer stood at EUR 9.4 billion on 30.06.2021, increased by EUR 1.8 billion since 31.03.2021, mainly due to increase of customer deposits by € 1.4 bn. Net outflows increased by € 390 mn, mainly due to increase of LCR retail and corporate deposit perimeter by € 2.4 bn.

The following table provides a breakdown of the LCR as of 30 June 2021, in accordance with Article 435 of the Regulation (EU) No 575/2013 and the respective guidelines on LCR disclosure (EBA/GL/2017/01).

The figures are calculated as simple averages of end-of-month observations of the Group LCR.



Template 40: EU LIQ1: Quantitative information of LCR

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (DD Month YYY)	30.6.2021	31.3.2021	31.12.2020	30.9.2020	30.6.2021	31.3.2021	31.12.2020	30.9.2020
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					7,309	6,508	5,820	4,817
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	34,071	33,374	30,225	27,028	1,904	1,810	1,661	1,532
3	<i>Stable deposits</i>	17,922	17,448	17,442	17,235	896	872	872	862
4	<i>Less stable deposits</i>	8,954	8,294	6,889	5,787	1,007	936	788	669
5	Unsecured wholesale funding	7,230	7,245	7,421	7,238	3,310	3,313	3,368	3,248
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	202	191	182	182	50	48	45	46
7	<i>Non-operational deposits (all counterparties)</i>	7,008	7,036	7,221	7,056	3,239	3,247	3,305	3,203
8	Unsecured debt	20	18	18	0	20	18	18	0
9	Secured wholesale funding					45	194	233	290
10	Additional requirements	377	379	376	371	253	254	253	253
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	242	242	242	242	242	242	242	242
12	<i>Outflows related to loss of funding on debt products</i>	0	0	0	0	0	0	0	0
13	<i>Credit and liquidity facilities</i>	135	137	133	128	11	11	11	11
14	Other contractual funding obligations	465	489	567	616	433	450	518	554
15	Other contingent funding obligations	7,424	7,392	7,305	7,209	384	382	376	371
16	TOTAL CASH OUTFLOWS					6,329	6,402	6,410	6,248
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	0	118	118	118	0	0	0	0
18	Inflows from fully performing exposures	520	541	558	525	260	270	279	263
19	Other cash inflows	1,784	1,813	1,862	1,877	844	860	886	863
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution)					0	0	0	0
20	TOTAL CASH INFLOWS	2,304	2,472	2,538	2,520	1,105	1,130	1,165	1,125
EU-20a	<i>Fully exempt inflows</i>	0	0	0	0	0	0	0	0
EU-20b	<i>Inflows subject to 90% cap</i>	0	0	0	0	0	0	0	0
EU-20c	<i>Inflows subject to 75% cap</i>	2,304	2,353	2,420	2,402	1,105	1,130	1,165	1,125
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					7,309	6,508	5,820	4,817
22	TOTAL NET CASH OUTFLOWS					5,224	5,272	5,246	5,123
23	LIQUIDITY COVERAGE RATIO					140%	124%	112%	94%



9.2 Net Stable Funding Ratio (NSFR)

The NSFR ratio relates the Bank's available stable funding to its required stable funding and it should be equal to at least 100%. The ratio is calculated in accordance with the Regulation (EU) 2019/876 of the European Parliament and of the Council and a limit of 100% became binding in June 2021.

Template 41: EU LIQ2: Net Stable Funding Ratio as of 30.6.2021

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity			Weighted value	
		No maturity < 6 months	6 months to < 1yr	≥ 1yr		
Available stable funding (ASF) Items						
1	Capital items and instruments	5,964	-	-	1,000	6,964
2	Own funds	5,964	-	-	1,000	6,964
3	Other capital instruments	-	-	-	-	-
4	Retail deposits	-	34,198	1,394	12	33,201
5	Stable deposits	-	22,353	773	8	21,978
6	Less stable deposits	-	11,845	621	4	11,223
7	Wholesale funding:	-	10,981	191	14,991	18,813
8	Operational deposits	-	239	-	-	-
9	Other wholesale funding	-	10,742	191	14,991	18,813
10	Interdependent liabilities	-	-	-	-	-
11	Other liabilities:	-	-	-	-	-
12	NSFR derivative liabilities	-	-	-	-	-
13	All other liabilities and capital instruments not included in the above categories	-	-	-	-	-
14	Total available stable funding (ASF)					58,977
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					8,224
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		4,356	1,906	22,090	23,249
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		668	13	162	235
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,375	1,678	16,318	21,925
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		111	100	1,103	4,732
22	Performing residential mortgages, of which:		161	153	4,569	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		124	129	3,810	-



		a	b	c	d	e
		Unweighted value by residual maturity			Weighted value	
		No maturity	< 6 months	6 months to < 1yr		≥ 1yr
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		152	62	1,042	1,089
25	Interdependent assets		-	-	-	-
26	Other assets:		4,773	2,045	20,363	20,846
27	<i>Physical traded commodities</i>				-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	102	87
29	<i>NSFR derivative assets</i>		747			747
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		1,141			57
31	<i>All other assets not included in the above categories</i>		2,885	157	18,475	19,956
32	Off-balance sheet items					
33	Total RSF					52,936
34	Net Stable Funding Ratio (%)					111.41%

10 Appendix

10.1 Appendix I – Own Funds structure

The following table presents the analysis of Own funds structure:

Template 42: EU CC1 - Composition of regulatory own funds

(Amounts in millions of Euro)

		a	a	b
		30.6.2021	31.12.2020	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	11,266	11,264	
2	Retained earnings	(3,367)	(3,459)	
3	Accumulated other comprehensive income (and other reserves)	342	319	
EU-3a	Funds for general banking risk	-	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1			
5	Minority interests (amount allowed in consolidated CET1)	0	0	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	89	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	8,241	8,213	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	(8)	(9)	
8	Intangible assets (net of related tax liability) (negative amount)	(314)	(413)	(a)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(49)	(11)	(b)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	216	224	
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	-	
15	Defined-benefit pension fund assets (negative amount)			
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)			

		a	a	b
		30.6.2021	31.12.2020	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative			
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c	of which: securitisation positions (negative amount)	-	-	
EU-20d	of which: free deliveries (negative amount)	-	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(1,685)	(1,433)	(b)
22	Amount exceeding the 17,65% threshold (negative amount)	(85)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	(13)		
25	of which: deferred tax assets arising from temporary differences	(71)		(b)
EU-25a	Losses for the current financial year (negative amount)	(2,336)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a	Other regulatory adjustments	895	1,257	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(3,364)	(386)	
29	Common Equity Tier 1 (CET1) capital	4,877	7,827	
Additional Tier 1 (AT1) capital: instruments				

		a	a	b
		30.6.2021	31.12.2020	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
30	Capital instruments and the related share premium accounts			
31	of which: classified as equity under applicable accounting standards			
32	of which: classified as liabilities under applicable accounting standards			
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) CRR	1	3	(d)
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1			
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1			
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties			
35	of which: instruments issued by subsidiaries subject to phase out			
36	Additional Tier 1 (AT1) capital before regulatory adjustments	1	3	
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)			
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)			
42a	Other regulatory adjustments to AT1 capital			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-	
44	Additional Tier 1 (AT1) capital	1	3	
45	Tier 1 capital (T1 = CET1 + AT1)	4,878	7,830	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	1,015	515	(c) (d)



		a	a	b
		30.6.2021	31.12.2020	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	(1)	(3)	(d)
EU-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	-	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	-	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties			
49	of which: instruments issued by subsidiaries subject to phase out			
50	Credit risk adjustments	-	-	
51	Tier 2 (T2) capital before regulatory adjustments	1,013	512	
Tier 2 (T2) capital: regulatory adjustments				
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)			
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	-	
EU-56b	Other regulatory adjustments to T2 capital			
57	Total regulatory adjustments to Tier 2 (T2) capital	-	-	
58	Tier 2 (T2) capital	1,013	512	
59	Total capital (TC = T1 + T2)	5,892	8,342	
60	Total Risk exposure amount	38,109	45,369	
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	12.8%	17.3%	

		a	a	b
		30.6.2021	31.12.2020	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
62	Tier 1 (as a percentage of total risk exposure amount)	12.8%	17.3%	
63	Total capital (as a percentage of total risk exposure amount)	15.5%	18.4%	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	9.19%	9.19%	
65	of which: capital conservation buffer requirement	2.50%	2.50%	
66	of which: countercyclical buffer requirement	0.00%	0.00%	
67	of which: systemic risk buffer requirement	0.00%	0.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	0.50%	0.50%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.69%	1.69%	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	4.55%	9.00%	
Amounts below the thresholds for deduction (before risk weighting)				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	23	21	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	94	68	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	504	800	
Applicable caps on the inclusion of provisions in Tier 2				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)			



		a	a	b
		30.6.2021	31.12.2020	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	
<i>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)</i>				
80	Current cap on CET1 instruments subject to phase out arrangements	-	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-	