

EUROBANK CYPRUS LTD

Report and Financial Statements

For the year ended 31 December 2022

Report and financial statements for the year ended 31 December 2022

Contents

	Page
Board of Directors and Other Officers	1
Management Report	2 – 11
Independent Auditors' Report	12 – 17
Income Statement	18
Statement of Comprehensive Income	19
Balance Sheet	20
Statement of Changes in Equity	21
Cash Flow Statement	22
Notes to the Financial Statements	23 – 169
Appendix - Definition of financial ratios included in the Management Report	170

Board of Directors and Other Officers

Board of Directors

O. Ellingham

S. loannou

M. Louis

D. Shacallis

R. Kyprianou

A. Soteriou

T. Phidia

C. Kitti

A. Pittas

E. Murray

M. Redferne

C. McAnulty

N. Karamouzis

Chair, Non Executive

Vice Chair, Non Executive (since 1 November 2022)

Executive

Executive

Non Executive (appointed on 3 March 2023)

Non Executive (appointed on 13 March 2023)

Vice Chair, Non Executive (resigned on 31 October 2022)

Executive Committee

M. Louis

D. Shacallis

A. Petsas

A. Malliotis

A. Antoniou

S. Kassianides

D. Eliades

N. Panayi

M. Hadjikyriakos

D. Kolkas

Company Secretary

D. Shacallis

Registered office

41 Arch. Makariou III Avenue

5th floor

CY-1065 Nicosia

Cyprus

Management Report

The Board of Directors presents its report together with the audited financial statements of Eurobank Cyprus Ltd (the "Bank") for the year ended 31 December 2022.

Principal activity

The principal activity of the Bank, which is unchanged from last year, is the provision of banking and financial services.

Branches

The Bank did not operate through any branches outside Cyprus during the year.

Review of developments, position and performance of the Bank's business

The main financial highlights for the year are as follows:

	2022	2021
Key Financial Results	€′000	€′000
Net interest income	127,280	80.705
Operating income	164.484	112.008
Operating expenses	47.307	41.899
Profit from operations before impairments and provisions	117.177	70.109
Impairment allowances	1.440	3.378
Profit before income tax and government levies	115.737	66.731
Net profit	94.336	52.277
	34.330	32.277
Balance Sheet Highlights	€′000	€′000
Customer deposits	7.202.822	6.619.640
Loans and advances to customers	2.729.918	2.600.550
Total assets	8.930.915	8.156.866
Equity	636.316	571.473
		371.473
Financial Ratios ¹	%	%
Cost to income	28,8	37,4
Return on equity	15,6	9,5
Loans to deposits	37,9	39,3
Cost of risk	0,1	0,2
NPE provisions coverage	77,0	83,1
Credit-impaired loans/gross loans	2,5	2,4
Capital adequacy ratio (all CET 1)	27,3	25,4
MREL ratio	28,6	25,4
Leverage ratio	7,2	7,1

¹ Definitions of the selected financial ratios are provided in the Appendix.

Management Report (continued)

Review of developments, position and performance of the Bank's business (continued)

The Bank managed to produce satisfactory financial performance during 2022 despite the effects of the Russia-Ukraine war, disruptions in the supply chains and rising inflation in the local as well as the global economy. Costs were maintained within the Bank's expectations as well as cost of risk and asset quality. Balance Sheet expansion was mainly led by increased deposits which fueled the expansion of the Bank's loan book as well as the Bank's bond portfolio.

Profit after tax for the year amounted to €94,3 million recording a 80% or €42,1 million increase in comparison to 2021's profit which amounted to €52,3 million. The main drivers for this year's profitability include increased net interest income ("NII"), net commission income, management of operating expenses and lower than expected credit losses ("ECL") as a result of the Bank's good quality of its loan book and the high provisions coverage ratio.

NII supported by the increase in interest rates, as a result of the rising interest rates environment especially during the second half of 2022, reported a 58% or €46,6 million increase in 2022 vs 2021. Main contributors include interest income from loans & advances to customers resulting from €265 million higher average balance of loans & advances vs 2021, interest income from the bond portfolio due to the expansion of the portfolio by €165 million on average vs 2021, the effective usage of excess liquidity and deposit cost containment.

Net banking fee and commission income for the year reported a 19% increase in comparison to the prior year and amounted to €36,4 million. All banking fee and commission income streams reported positive deltas vs 2021 mainly driven by transactional, wealth management and lending related fees.

The increase in operating expenses was mainly due to the increase in headcount, regulatory costs and maintenance costs in relation to the Bank's information technology systems. Cost discipline was sustained in line with expectations. This is supported by the low cost/income ratio of 28,8% reported for 2022 recording a further improvement vs last year's ratio of 37,4%, which is significantly better vs the Bank's local peers as well as the EU Bank average of 60,6% as reported for the 4Q'22 by the European Banking Authority ("EBA") quarterly risk dashboard. With the expected digital transformation of the Bank more economies of scale are expected in this area in the years to come.

ECL on loans and advances reported a ~67% decrease in comparison to the previous year. This was due to the healthy loan book of the Bank as well as proactive actions taken by the Bank for effective risk management. The quality of the Bank's loan portfolio remained strong in 2022 as depicted by the creditimpaired loans/gross loans ratio of 2,5% at the end of 2022. The Bank is continuously monitoring the quality of the loan book due to the possible effects to the Cyprus economy of the Russia-Ukraine crisis and rising interest rates. In addition, the provisions coverage ratio remains at a healthy level and amounts to 77% as at the end of 2022.

As a result of the increased profitability, return on equity improved to 15,6% in 2022 vs 9,5% in 2021. This compares favourably with the EU bank average of 8% as reported for the 4Q'22 by the EBA quarterly risk dashboard.

Management Report (continued)

Review of developments, position and performance of the Bank's business (continued)

Customer deposits supported by strong relationships across all customer business pillars the Bank operates, maintained a pace of growth reporting an increase of 9% or ~€0,6 billion during year and amounted to €7,2 billion. As such, the Bank managed to increase its market share in the Cyprus deposits market to 13,8% from 12,9% as at last year end. As a result of the rising interest rates, the Bank's overall cost of deposits increased by 0,56%, from 0,03% in December 2021 to 0,59% in December 2022.

The Bank's liquid assets continue to exceed the minimum regulatory requirements of 100% in relation to the Liquidity Coverage Ratio ("LCR") which as at 31 December 2022 stood at 246% vs 303% of last yearend. The liquidity surplus in LCR amounted to €4,1 billion at 31 December 2022 compared to €3,7 billion surplus as at 31 December 2021, mainly driven by the increase in customer deposits.

At 31 December 2022, the Net Stable Funding Ratio ("NSFR") stood at 197% compared to 191% at 31 December 2021, above the minimum regulatory requirement of 100%.

Loans & advances to customers amounted to €2,7 billion reporting €130 million or 5% increase vs 2021. Total loans granted during 2022 amounted to ~€550 million gross of scheduled and unscheduled repayments. The loan credit expansion covered all of the Bank's main pillars with Corporate Banking Division reporting the highest loans delta followed by Shipping. The Bank's market share in the Cyprus loans market increased to 10,7% vs 8,9% of 2021.

The Bank has maintained its strong liquidity position with a Loans to Deposits ratio of 37,9% largely driven by a higher increase in deposits vs loans.

The Bond portfolio increased by €0,3 billion during 2022 as the Bank sought to utilise large liquidity surpluses and follow a conservative NII enhancement strategy through acquisitions of short- and medium-term high quality debt securities.

Total assets amounted to €8,9 billion reporting an increase of €0,77 billion during the year supported mainly by the increase in deposits. Despite the increase in total assets, Risk Weighted Assets ("RWAs") only increased by €57 million and reached €2,2 billion at the end of 2022 as a result of the performance of a RWAs optimisation process by the Bank during the year.

Total equity as at 31 December 2022 reported a 11% increase and amounted to €636,3 million mainly driven by this year's profitability. The strengthening of the Bank's capital base coupled by the active management of the RWAs resulted in the increase of the Bank's Capital adequacy and CET1 ratios as at the end of 2022 by 190bps to 27,3%.

Similarly, the Bank's MREL ratio improved by 320bps vs the 2021 position and amounted to 28,6% supported by the increase in equity and the issuance by the Bank's Parent Eurobank S.A. of a €30 million 3-year non-callable in 2, senior non-preferred loan during 1H'22.

The financial position, development and performance of the Bank as presented in these financial statements are considered satisfactory.

Management Report (continued)

Review of developments, position and performance of the Bank's business (continued)

Over the past 3 years, the Bank has been engaged in a major transformation project, to adapt to the changing needs of the market. A material component of this initiative is the changing of the Bank's technology landscape and business process re-engineering and exposure to digital banking. The project includes the replacement of the Bank's core banking system along with a new wealth management system, digital channels, an ERP system, data analytics and compliance modules. With its implementation we expect to bring our Bank at the forefront of technology, improve efficiency and more importantly, improve the client journey and service.

Business outlook and risks

The Cypriot economy proved remarkably resilient in 2022, even in the face of growing economic and geopolitical uncertainties, mainly supported by strong private consumption, healthy employment, and increased savings during the pandemic, as well as robust investment on the back of the implementation of the Recovery and Resilience Plan (RRP).

According to the Statistical Service of Cyprus (CYSTAT), the GDP for the year 2022 is provisionally estimated at €27,01 billion at current prices compared to €24,02 billion in 2021 and €24,23 billion at volume measures (constant prices) for the year 2022, compared to €22,94 billion in 2021. The growth rate in real terms is estimated at 5,6% in 2022, compared to 6,6% in 2021 and -4,4% in 2020.

Downward pressures are expected to intensify causing economic activity to decelerate in 2023 due to the global economic slowdown, rising interest rates, high energy prices and inflation. Increasing interest rates and weaker purchasing power due to inflation are expected to negatively affect consumption, corporate investments, and residential construction. In its latest macroeconomic forecasts, published March 2023, the Central Bank of Cyprus ("CBC") projects that the economy will grow by 2,6% in 2023. For 2024 and 2025 the CBC expects Cyprus' GDP to increase by 3,0% and 3,1% respectively. According to the winter European Commission economic forecasts for Cyprus, elevated prices and tightening monetary policy are expected to weigh on real GDP growth, which is forecast to slow down to 1,6% in 2023, before accelerating to 2,1% in 2024.

One of the main contributors for the better-than-expected GDP growth in 2022 was the tourism sector. Arrivals and revenues from tourism reached more than 80%, and 91% of the 2019 pre-pandemic levels, respectively in comparable 2019 periods. For the 12 month period of January − December 2022, arrivals of tourists totaled 3,2 million compared to 1,94 million in the corresponding period of 2021, 0,63 million in the period of January − December 2020 and 3,98 million arrivals in the period of January − December 2019. For the period of January − December 2022, revenue from tourism is estimated at €2,44 billion compared to €1,51 billion in the corresponding period of 2021, €392 million during the period of January − December 2020 and to €2,68 billion in the same period of 2019.

Inflation remains high even though price pressures show some signs of abating. In February 2023 the Harmonised Index of Consumer Prices (HICP) rose by 6,7% YoY and 0,8% MoM. For the period January – February 2023 the HICP rose by 6,8% compared to the corresponding period of the previous year.

Management Report (continued)

Business outlook and risks (continued)

In February 2023, the Consumer Price Index (CPI) inflation stood at 6,7%. Inflation is expected to decrease further, as falling gas and oil prices reduce energy inflation and supply disruptions ease. According to CBC forecasts, inflation is forecasted to decline to 3,3% in 2023, 2,3% in 2024 and 1,9% in 2025.

Employment conditions appear softer amid the international uncertainty. According to Eurostat, in January 2023 the seasonally adjusted unemployment rate in Cyprus stood at 7,4% compared to 6% in January 2022. The CBC expects the unemployment rate to reduce to 6,6% in 2023, 5,9% in 2024 and 5,5% in 2025.

Cyprus' fiscal performance came in stronger than expected over 2021 and 2022, supported by the robust economic performance. According to CYSTAT's preliminary fiscal results, the General Government fiscal balance presented a surplus of €609,5 million (2,3% of GDP) for the period of January – December 2022, as compared to a deficit of €402,8 million (1,7% of GDP) that was recorded during the period of January – December 2021. The strong performance for 2022, was a result of robust revenues, which increased by 14,5% to €11,4 billion and a slower increase in expenditure, which rose by 4,1% to €10,8 billion.

Central Government total debt amounted to €23,1 billion in December 2022 recording a 3,9% decrease compared to December 2021. The Government Debt/GDP ratio is seen at 85% as of the end of 2022, recording a significant improvement from the 104% recorded in 2021 and the 115% in 2020, on the back of stronger than expected fiscal performance and high reserves. According to the Public Debt Management Office's Annual Funding Plan, €1,52 billion of new debt is expected to be issued in 2023, including a €1 billion new bond issuance through the EMTN program. The new issue will replace €1 billion million of debt which will mature in July 2023 and has a coupon of 3,75%.

According to the European Commission economic forecasts for Cyprus (published in November 2022), the budget surplus is expected to reach around 1,1% of GDP in 2023, and 1,6% in 2024. The debt-to-GDP ratio is expected to decrease over the coming years, supported by positive expected nominal GDP growth and primary surpluses.

Cyprus credit outlook continued improving. Early 2023, Fitch upgraded Cyprus to BBB from BBB-, with a stable outlook. In July 2022 Standard and Poor upgraded the rating of Cyprus to BBB from BBB-, maintaining a stable outlook, while in August 2022 Moody's affirmed Ba1 rating but upgraded the outlook to positive from stable. Moody's also raised the macro profile of Cyprus to "Moderate-", from "Weak+". In their decisions, rating agencies cite the resiliency of Cypriot economy to external shocks, the improved asset quality in the banking sector, institutional strength and policy credibility backed by the country's Eurozone membership and the improving fiscal position with general government debt expected to decline considerably in the coming years on fiscal consolidation and dynamic economic activity.

The reduction in the total NPEs in the banking industry continued in the last months of 2022, albeit with a slower pace. Data published by the CBC showed that in December 2022 the non-performing loans in Cyprus decreased by €376,5 million MoM to €2,31 billion (NPL ratio at 9,47%) from €2,68 billion (NPL ratio at 10,50%) in November 2022. NPEs stood at €2,96 billion (NPL ratio at 10,99%) as at the end of 2021 and at €5,11 billion (NPL ratio at 17,70%) as at the end of 2020.

Management Report (continued)

Business outlook and risks (continued)

The Global as well as the Cypriot economy faces headwinds in the coming years. The outlook remains uncertain with risks from a volatile geopolitical environment, rising inflation and restrictive monetary policy threatening to push the global economy to recession. Eurobank Cyprus continues to monitor closely the different risks and the shifts in the macroeconomic and geopolitical outlook so that they are effectively and timely managed. In addition, the Bank complies with the coordinated sanctions imposed by the USA, EU, UK and other countries against Russia, Belarus and to specific legal entities and physical persons.

Environmental sustainability, social responsibility and governance

Our approach towards sustainable development

Eurobank Cyprus is committed to investing in sustainable development and in designing its actions to improve its impact on environmental sustainability, social responsibility and corporate governance. Among its strategic objectives is to adapt its business and operation in a way that addresses climate change challenges, to accommodate social needs within its business model, and to safeguard prudent governance for itself and its counterparties, in accordance with supervisory initiatives and following international best practices.

The Bank is in close communication with the Eurobank Group for the development of its ESG program in order to ensure alignment with the latest regulatory requirements/guidelines on Environmental, Social and Governance ("ESG") related issues as the environment surrounding ESG is dynamic with a number of frameworks and standards in place.

In line with the United Nations Sustainable Development Goals and the 2030 Agenda goals, Eurobank Cyprus develops its approach across the ESG spectrum and business objectives across two distinct levels of impact:

- i. Financed impact: Impact resulting from the Bank's lending and investing activities to specific sectors and clients;
- ii. Operational impact: Impact arising from the Bank's operational activities and footprint.

In 2022, the Bank initiated a number of activities on environmental impact (operational net zero, paperless banking, circular economy) as well as on employer impact (diversity and inclusion, wellbeing, innovative environment), and social/business impact (socio-economic effect, transparency). The Bank's aim is to support its operational impact strategy through a set of actions with measurable targets and Key Performance Indicators ("KPIs"), indicating the Bank's vision for the forthcoming decade in relation to environment, its social footprint, with focus on its people, and the ESG impact in the market.

In parallel, in 2022 the Bank has undertaken a number of actions in relation to the Financed Impact, aiming to support customers and society in their transition efforts towards a more ESG-friendly economic environment.

Management Report (continued)

Environmental sustainability, social responsibility and governance (continued)

Protection of environment

Eurobank Cyprus is committed to minimizing its environmental footprint and to promoting a green economy.

In this context, the Bank has adopted and promoted environmentally friendly practices during 2022 on energy consumption, renewable energy sources, greenhouse gases emissions, paper and water consumption. Indicatively, the Bank has proceeded during 2022 with the following actions:

- Installation of Photovoltaic and other Energy Saving Systems;
- Transfer of basic services to Cloud thus improving the environmental imprint of the Organisation;
- Replacement of hardcopy paper statement by e-statements / e-Banking;
- Reduction of average monthly paper consumption by 10% (2022 vs 2019);
- Recycling of papers, PMD, inks/toner cartridges, lamps/batteries and e-waste (electrical and electronic equipment waste);
- Replacement of consumables with reusable, recyclable and biodegradable materials;
- Dissemination of informative materials to staff about recycling, efficiency, energy, water saving, rational use of energy, electrical and IT equipment creating a cultivating and environmental culture.

The Bank is also in the process to implement a) targets and KPIs in order to measure and monitor the Bank's performance over time on the ESG themes, including on the environmental issues, b) an Environmental Management System (ISO 14001, EMAS) and c) an Energy Management System (ISO 50001).

Lastly, the upgrading of the Bank's infrastructure and further digitisation of its services through a large-scale IT project, expected to be completed within 2023, will significantly contribute in minimizing its environmental footprint.

EU Taxonomy Regulation

The EU Taxonomy (Regulation (EU) 2020/852 of the European Parliament and of the Council) was adopted in 2020 by the European Parliament and represents an important step for the EU to achieve the Paris Agreement climate neutrality goals. It sets out the criteria to establish a common classification system for sustainable economic activities.

The EU Taxonomy Regulation determines whether an economic activity is environmentally sustainable and obligates financial and non-financial entities subject to the Non-Financial Reporting Directive ("NFRD") to disclose the alignment of their activities. Separate reporting requirements and extensive criteria are established for financial and non-financial undertakings under the Art.8 Delegated Act of EU Taxonomy Regulation.

Management Report (continued)

Environmental sustainability, social responsibility and governance (continued)

The key indicator of alignment for Credit Institutions is the Green Asset Ratio ("GAR"), which companies will be required to publish starting in 2024. It determines the extent to which activities comply with the criteria of Taxonomy. It is the ratio of a company's taxonomy-aligned assets to covered assets (total assets excluding exposure to sovereigns, central banks and the trading portfolio).

Integration of Taxonomy in the Bank's business strategy, operating model, products and customers

The Bank recognises the significance of the impact of its activities to the society and the environment. It places high importance on the effective integration of Sustainability principles and ESG aspects throughout the activities of the organisation, the governance model and related commitments.

The Bank established its Governance Model on ESG issues in September 2022 with the establishment of a new ESG Management Committee, chaired by the Bank's CEO, while responsibilities have been assigned to all 3 lines of defence. Moreover, the Bank's Board of Directors monitors on a regular basis the ESG developments including the Bank's actions to address climate-related and environmental risks.

A project was initiated by the Bank in 2022 focusing on the development of the Bank's Sustainable Finance Framework and on ensuring full compliance with the ECB expectations as stated in the relevant ECB guide on climate and environmental risks.

Through the Sustainable Finance Framework, the Bank classifies sustainable lending solutions offered to its customers, specifying the applied classification approach and the activities defined as eligible to access sustainable financing (eligible green and social assets). The Framework's scope encompasses a wide range of ESG lending sustainable financial products and services covering the portfolios of the Bank. Conditions for granting lending sustainable financial products apply, according to the eligibility and exclusionary criteria which are laid down in the relevant framework. The Bank aims to fully integrate the Sustainable Finance Framework into its core operations within 2023.

The project on climate and environmental risks is a 2-year project and the Bank is expected to be fully aligned with the ECB's supervisory expectations by the end of 2024 at the latest in line with deadlines set by ECB. Through the activities that will be performed in the context of this project, the Bank is expected among others to i) categorise climate and environmental risks as drivers of existing risk categories within their risk management framework, and to conduct a full assessment of their impact on the Bank's activities, ii) include climate and environmental risks in their governance, strategy and risk management and iii) integrate climate and environmental risks in the Internal Capital Adequacy Process ("ICAAP") and stress testing.

Management Report (continued)

Environmental sustainability, social responsibility and governance (continued)

Employee Engagement

Human capital constitutes the Bank's most valuable asset. Starting from the recruitment process, the Bank aims to establish a long-term and mutually beneficial relationship with every member of staff.

As of 31 December 2022, the Bank employed 450 (31 December 2021: 435) members of staff with an average age of $^{\sim}40$. Percentage of women and men in the workplace during the years 2020-2022 remain unchanged with women representing 62% of the Bank's total workforce.

To ensure equal and fair opportunities to all employees, the Bank implements several policies covering Compensation, Recruitment, People & Talent Development, Performance Management, Learning, Engagement & Communication, and Health & Safety. The Bank recognises the significance and the impact of its activities for its members of staff, customers and society.

Eurobank Cyprus is committed to fostering a culture of Diversity, Equity & Inclusion ("DE&I") whereby the DE&I principles are integrated throughout the everyday working practices of the Bank, its governance model and related commitments. The DE&I Policy outlines the Bank's corporate values, scope, related regulatory documents, commitments and approach to incorporating applicable regulatory requirements, initiatives as well as adopted international best practices in the formation of a diverse, equitable and inclusive working environment, responsive to different cultures and groups, where everyone can have the opportunity to flourish. The Bank welcomes and embraces multiple viewpoints and perspectives which help towards becoming more open and inclusive.

Going concern assessment

Taking into consideration the above factors as well as the Bank's capital and liquidity position and factors included in note 2, the Board of Directors is satisfied that the financial statements of the Bank are prepared on a going concern basis.

Financial risk management

The Bank is exposed to risks, the most significant of which are credit risk, liquidity risk, and market risk. The Bank monitors, manages and mitigates these risks through various control mechanisms. Detailed information relating to the Bank's risk management is set out in note 4 of the financial statements.

Future developments of the Bank

The Bank currently operates through a network of 8 Banking Centres in Nicosia, Limassol, Larnaca, Paphos and Famagusta. The Bank will continue to strengthen its operations investing in human capital, information technology and processes and procedures in various areas.

Management Report (continued)

Results

The Bank's results for the year are set out on pages 18 and 19. Net profit for the year ended 31 December 2022 is retained.

Share capital

There were no changes in the Bank's share capital during the year ended 31 December 2022.

Board of Directors

The members of the Board of Directors of the Bank as at 31 December 2022 and at the date of this report are shown on page 1. All of them were members of the Board throughout the year 2022 and up to the date of this report, with the exception of Mr. M. Redferne and Ms. C. McAnulty who were appointed on 3 March and 13 March 2023, respectively, and Mr. N. Karamouzis who resigned on 31 October 2022 following the completion of a 12 year Board tenure with the Bank.

There were no other significant changes in the distribution of responsibilities or compensation of the Board of Directors.

Bank Management

The Bank's Executive Committee as at 31 December 2022 and at the date of this report is shown on page 1.

Events after the balance sheet date

Events after the balance sheet date are described in note 33 of the financial statements.

Auditors

The Independent Auditors, KPMG Limited, have expressed their willingness to continue in office.

By Order of the Board of Directors

Michalis Louis

Chief Executive Officer

Nicosia, 21 April 2023





KPMG Limited Chartered Accountants 14 Esperidon Street, 1087 Nicosia, Cyprus P.O. Box 21121, 1502 Nicosia, Cyprus T: +357 22 209000, F: +357 22 678200

12

INDEPENDENT AUDITORS' REPORT TO THE MEMBERS OF

EUROBANK CYPRUS LTD

Report on the audit of the financial statements

Opinion

We have audited the accompanying financial statements of the parent company Eurobank Cyprus Ltd (the "Bank"), which are presented on pages 18 to 169 and comprise the balance sheet as at 31 December 2022, and the income statement, and the statements of comprehensive income, changes in equity and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Bank as at 31 December 2022, and of its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union ("IFRS-EU") and the requirements of the Cyprus Companies Law, Cap. 113, as amended from time to time (the "Companies Law, Cap.113").

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs"). Our responsibilities under those standards are further described in the "Auditors' responsibilities for the audit of the financial statements" section of our report. We remained independent of the Bank throughout the period of our appointment in accordance with the International Code of Ethics (Including International Independence Standards) for Professional Accountants of the International Ethics Standards Board for Accountants ("IESBA Code") together with the ethical requirements in Cyprus that are relevant to our audit of the financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

> Limassol P.O. Box 50161, 3601 T: +357 25 869000 F: +357 25 363842

T: +357 26 943050 F: +357 26 943062

Polis Chrysochous P.O. Box 66014, 8330 T: +357 26 322098 F: +357 26 322722

P.O. Box 40075, 6300

T: +357 24 200000 F: +357 24 200200



Key audit matters incorporating the most significant risks of material misstatements, including assessed risk of material misstatements due to fraud

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

Impairment of loans and advances to customers

Refer to note 3.1, 4.2.1.3 and 16 of the Financial statements

Key audit matter

At 31 December 2022 the Bank reported total gross loans and advances to customers of €2.775.548 thousand and €45.630 thousand of expected credit losses ("ECL").

Key judgments and estimates in respect of the timing and measurement of ECL include:

- Allocation of loans and advances to customers to stages 1, 2, or 3 using criteria in accordance with the relevant accounting standard;
- Accounting interpretations, modelling assumptions and estimations used to build the models that calculate ECL, including the determination of Probabilities of Default ('PD') which is considered the most significant judgemental aspect of the Bank's ECL modelling approach;
- Inputs and assumptions used to estimate the impact of multiple economic scenarios, along with the weightedprobabilities used; and
- Measurements of individually assessed exposures.

As a result of the significance of the amount and the judgements and estimates involved, we have determined that ECL on loans and advances to customers is a key audit matter.

How the matter was addressed in our audit

Our audit procedures in this area included, among others:

- 1. Selecting a sample of loans and advances to customers in stages 1 and 2 to assess the reasonableness of credit rating assigned and therefore determine the appropriateness of stage allocation within all three stages (stages 1, 2, and 3).
- 2. For stage 1 and stage 2 assets, with the support of our internal credit modelling specialists, we have:
- Inspected and assessed the model documentation and methodology for compliance with IFRS 9 and market practice.
- Tested the key assumptions, inputs and mathematical theory used in ECL model. This included assessing the mathematical theory of the model used, through testing that the methodology applied was appropriate including where relevant the mathematical integrity and statistical robustness of the model.
- Performed risk based substantive testing of models, including independently re-building certain assumptions and compared the calculated amount with the recognized amount.
- Performed reconciliations between the databases used to calculate ECL and the accounting data including the testing of the flow and transformation of data between source systems to the impairment calculation engine.
- For the critical data used in the year end ECL calculation, accuracy was tested by reconciling/tracing to source systems/documents.



- 3. For stage 3 assets, we performed credit assessment on a sample of loans and advances to customers, assessing the appropriateness of impairment loss allowance. This included an assessment of the main assumptions used to assess the expected recovery flows, including realizable value of collaterals.
- 4. For a sample of valuations used in ECL calculation, with the support of our internal valuation specialists, we assessed the reasonableness and appropriateness of the methodology used by the Bank's external experts to determine the fair value of the property collaterals. Additionally, we assessed the competence and independence of the Bank's external experts.
- 5. We assessed the adequacy and appropriateness of disclosures for compliance with the relevant accounting standards.

Other information

The Board of Directors is responsible for the other information. The other information comprises the management report, but does not include the financial statements and our auditors' report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon, except as required by the Companies Law, Cap.113.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

With regards to the management report, our report in this regard is presented in the "Report on other legal and regulatory requirements" section.

Responsibilities of the Board of Directors and those charged with governance for the financial statements

The Board of Directors is responsible for the preparation of financial statements that give a true and fair view in accordance with IFRS-EU and the requirements of the Companies Law, Cap. 113, and for such internal control as the Board of Directors determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.



Responsibilities of the Board of Directors and those charged with governance for the financial statements (cont.)

In preparing the financial statements, the Board of Directors is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless there is an intention to either liquidate the Bank or to cease operations, or there is no realistic alternative but to do so.

The Board of Directors and those charged with governance are responsible for overseeing the Bank's financial reporting process.

Auditors' responsibilities for the audit of the financial statements

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

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.
- Conclude on the appropriateness of the Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Bank to cease to continue as a going concern.



Auditors' responsibilities for the audit of the financial statements (cont.)

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report.

Report on other regulatory and legal requirements

Other regulatory requirements

Pursuant to the requirements of Article 10(2) of European Union (EU) Regulation 537/2014 we provide the following information in our Independent Auditors' Report, which is required in addition to the requirements of ISAs.

Date of appointment and period of engagement

We were appointed auditors on 6 July 2018 by the Annual General Meeting of the Bank's members to audit the financial statements of the Bank for the year ended 31 December 2018. Our total uninterrupted period of engagement, having been renewed annually by shareholders' resolution is 5 years covering the periods ending 31 December 2018 to 31 December 2022.

Consistency of auditors' report to the additional report to the Audit Committee We confirm that our audit opinion on the financial statements expressed in this report is consistent with the additional report presented to the Audit Committee of the Bank, which is dated 21 April 2023.

Provision of Non-audit Services ('NAS')

We have not provided any prohibited NAS referred to in Article 5 of EU Regulation 537/2014 as applied by Section 72 of the Auditors Law of 2017, L.53(I)2017, as amended from time to time ("Law L53(I)/2017").



Other legal requirements

Pursuant to the additional requirements of law L.53(I)/2017, and based on the work undertaken in the course of our audit, we report the following:

- In our opinion, the management report, the preparation of which is the responsibility of the Board of Directors, has been prepared in accordance with the requirements of the Companies Law, Cap 113, and the information given is consistent with the financial statements.
- In the light of the knowledge and understanding of the business and the Bank's environment obtained in the course of the audit, we have not identified material misstatements in the management report.

Other Matter

This report, including the opinion, has been prepared for and only for the Bank's members as a body in accordance with Article 10(1) of the EU Regulation 537/2014 and Section 69 of Law L.53(I)/2017 and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whose knowledge this report may come to.

The engagement partner on the audit resulting in this independent auditors' report is Constantinos N. Kallis.

Constantinos N. Kallis, FCA Certified Public Accountant and Registered Auditor for and on behalf of

KPMG Limited Certified Public Accountants and Registered Auditors 14 Esperidon Street 1087 Nicosia Cyprus

21 April 2023

Income Statement for the year ended 31 December 2022

		2022	2021
	Note	€′000	€′000
Interest income calculated using the effective interest method	5	137.881	85.812
Other interest income	5	17.886	6.681
Interest expense calculated using the effective interest method	5	(21.345)	(10.992)
Other interest expense	5	(7.142)	(796)
Net interest income		127.280	80.705
Banking fee and commission income	6	43.330	36.129
Banking fee and commission expense	6	(6.888)	(5.421)
Net banking fee and commission income		36.442	30.708
Net trading income	7	444	49
Net gains from other financial instruments	8	310	531
Other income		8	15
Net other operating income		762	595
Operating income		164.484	112.008
Staff costs	9	(26.017)	(23.610)
Depreciation and amortisation	19,20	(4.740)	(4.291)
Other operating expenses	10	(16.550)	(13.998)

Profit from operations before impairments and provisions		117.177	70.109
Impairment allowance on loans and advances (Impairment)/reversal of other impairment allowances and	4.2.1.3	(1.233)	(3.737)
provisions	11	(207)	359
provisions			
Profit before income tax and government levies		115.737	66.731
Government levy on customer deposits	24	(6.992)	(5.952)
Income tax expense	12	(14.409)	(8.502)
Net profit		94.336	52.277
Her profit			

Statement of Comprehensive Income for the year ended 31 December 2022

	2022 €′000		2021 €′000	
Net profit		94.336		52.277
Other comprehensive income:				
Items that are or may be subsequently reclassified to income statement:				
Debt securities at FVOCI (note 17) - net changes in fair value, net of tax - reclassified to income statement, net of tax	(29.333) (160)	(29.493)	(7.084) (422)	(7.506)
Other comprehensive loss for the year, net of tax		(29.493)		(7.506)
Total comprehensive income for the year		64.843		44.771

The notes on pages 23 to 169 form an integral part of these financial statements.

Balance Sheet at 31 December 2022

	Note	2022 €′000	2021 €′000
Assets			
Cash and balances with central banks	13	3.266.706	2.843.751
Due from credit institutions	14	1.526.920	1.626.798
Derivative financial instruments	15	23.938	18.539
Loans and advances to customers	16	2.729.918	2.600.550
Investment securities	17	1.324.683	1.016.938
Investments in subsidiaries	18	10	10
Property and equipment	19	27.029	27.728
Intangible assets	20	27.595	18.851
Deferred tax assets	12	2.171	1.779
Other assets	21	1.945	1.922
Total assets		8.930.915	8.156.866
	,		
Liabilities			
Due to central banks	22	605.322	607.747
Due to credit institutions	23	361.643	268.465
Derivative financial instruments	15	26.887	9.265
Due to customers	24	7.202.822	6.619.640
Current tax liabilities	12	1.225	2.424
Deferred tax liabilities	12	2.046	363
Other liabilities	25	94.654	77.489
Total liabilities		8.294.599	7.585.393
Equity			
Share capital	26	12.010	12.010
Share premium	26	245.384	245.384
Other reserves	17	(29.619)	(126)
Retained earnings		408.541	314.205
Total equity		636.316	571.473
Total equity and liabilities		8.930.915	8.156.866

On 21 April 2023 the Board of Directors of Eurobank Cyprus Ltd authorised the issuance of these financial statements.

Oliver Ellingham, Chair of the Board of Directors

Michalis Louis, Chief Executive Officer

Demetris Shacallis, Chief Financial Officer

The notes on pages 23 to 169 form an integral part of these financial statements.

Statement of Changes in Equity for the year ended 31 December 2022

	Share capital €'000	Share premium €'000	Fair value reserve €'000	Retained earnings €'000	Total equity €'000
Balance at 1 January 2021	12.010	245.384	7.380	261.928	526.702
Net profit Other comprehensive loss	<u>.</u>	-	- (7.506)	52.277	52.277 (7.506)
Total comprehensive income for the year			(7.506)	52.277	44.771
Balance at 31 December 2021	12.010	245.384	(126)	314.205	571.473
Balance at 1 January 2022	12.010	245.384	(126)	314.205	571.473
Net profit Other comprehensive loss		<u>.</u>	- (29.493)	94.336	94.336 (29.493)
Total comprehensive income for the year	_	_	(29.493)	94.336	64.843
Balance at 31 December 2022	12.010	245.384	(29.619)	408.541	636.316

Cash Flow Statement for the year ended 31 December 2022

•		2022	2021
	Note	€′000	€,000
Cash flows from operating activities			66.704
Profit before income tax and government levies		115.737	66.731
Adjustments for:	20	74.4	F00
Amortisation of intangible assets	20	714	509 3.782
Depreciation of property and equipment	19 19	4.026 10	3.762 25
Loss on disposal/write-offs of property and equipment	19	10	25
(Reversal of impairment allowance)/impairment allowance on loans and advances	4.2.1.3	(1.637)	1.090
to customers	13	(1.037)	(1)
Reversal of impairment allowance on balances with central banks Reversal of impairment allowance on due from credit institutions	14	(27)	(19)
Impairment allowance on credit related commitments and contingent liabilities	4.2.1.3	2.870	2.636
Foreign exchange differences on impairment allowance on loans and advances			
to customers	4.2.1.3	(67)	(203)
Foreign exchange differences on impairment allowance on due from credit institutions		3	-
Foreign exchange differences on right-of-use assets		(8)	(5)
Gain on disposal of investments in subsidiaries	18	₩	(6)
Net gains on revaluation of loans and advances to customers at FVTPL	16	•	45
Other income on investment securities	31	(56.657)	(38.588)
		64.951	35.996
Changes in operating assets and liabilities		4	(7.4.0)
Net increase in cash and balances with central banks	13	(11.288)	(7.140)
Net decrease in due from credit institutions	14	24	19
Net decrease/(increase) in derivative financial instruments	15	12.223	(62.251) (401.871)
Net increase in loans and advances to customers	16	(127.664)	(401.871)
Disposals, write-offs and adjustments to right-of-use assets	19 21	(2.271) (23)	(619)
Net increase in other assets	22	(2.425)	59,206
Net (decrease)/increase in due to central banks Net increase in due to credit institutions	23	93.178	126.116
Net increase in due to credit institutions Net increase in due to customers	24	583.182	1.135.511
Net increase in ode to customers Net increase in other liabilities	25	16.751	12.994
Met Metegge III other Habilities	•	561.687	861.261
Government levy on customer deposits paid	24	(6.992)	(5.952)
Income tax paid	12	(14.317)	(8.380)
Net cash flows from operating activities ¹		605.329	882.925
Met cast trong between activities	•		
Cash flows from investing activities			~
Proceeds from disposal of investments in subsidiaries	18	-	7
Purchases of intangible assets	20	(9.458)	(5.450)
Purchases of property and equipment	19 17	(1.058) 255.077	(1.063) 494.836
Proceeds from disposals, maturities and redemptions of investment securities	17	(560.868)	(507.300)
Payments for acquisition of investment securities	17	25.210	21.578
Interest received on investment securities	1,	(291.097)	2.608
Net cash flows (used in)/from investing activities		(231.037)	2.000
Cash flows from financing activities		,	[a.a.=1
Payment of lease liabilities ²	28	(2.456)	(2.415)
Net cash flows used in financing activities		(2.456)	(2.415)
Net increase in cash and cash equivalents		311.776	883.118
Cash and cash equivalents at beginning of year	31	4.408.819	3.525.701
Cash and cash equivalents at end of year	31	4.720.595	4.408.819

¹Includes interest received of €139.460 thousand (2021: €82.915 thousand) and interest paid of €22.600 thousand (2021: €17.969 thousand).

The notes on pages 23 to 169 form an integral part of these financial statements.

²The Bank has classified cash payments for the principal portion of lease payments as financing activities and cash payments for the interest portion amounting to €261 thousand (2021: €262 thousand) as operating activities.

Notes to the financial statements

1 General information

Country of incorporation

Eurobank Cyprus Ltd ("the Bank") is a company domiciled and incorporated in Cyprus as a private limited liability company in accordance with the provisions of the Cyprus Companies Law, Cap. 113. Its registered office and business address is at 41 Arch. Makariou III Avenue, 5th floor, 1065 Nicosia, Cyprus.

Principal activity

The principal activity of the Bank, which is unchanged from last year, is the provision of banking and financial services.

2 Basis of preparation and significant accounting policies

2.1 Basis of preparation

The financial statements of the Bank have been prepared in accordance with International Financial Reporting Standards ("IFRS") issued by the International Accounting Standards Board ("IASB"), as endorsed by the European Union ("EU"), and in particular with those standards and interpretations, issued and effective for annual periods beginning on 1 January 2022. The financial statements of the Bank have also been prepared in accordance with the requirements of the Cyprus Companies Law, Cap. 113.

The financial statements have been prepared under the historical cost basis, except for financial assets measured at fair value through other comprehensive income, financial assets and financial liabilities (including derivative instruments) measured at fair value through profit or loss and recognised financial assets and financial liabilities designated as hedged items in qualifying fair value hedging relationships measured at amortised cost adjusted for hedging gain or loss.

The accounting policies for the preparation of the financial statements have been consistently applied to the years 2022 and 2021, after taking into account the amendments in IFRSs as described in note 2.1.1 "New and amended standards and interpretations" and the amendments in the Bank's accounting policies as described in note 2.2 "Principal accounting policies". Where necessary, comparative figures have been adjusted to conform to changes in presentation in the current year.

The preparation of financial statements in accordance with IFRS requires the use of estimates and judgments that affect the reported amounts of assets and liabilities and disclosure of contingent liabilities at the date of the financial statements, as well as the reported amounts of revenues and expenses during the reporting period. Although these estimates are based on management's best knowledge of current events and actions, actual results ultimately may differ from those estimates. The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in note 3.

These separate financial statements contain information about Eurobank Cyprus Ltd as an individual company and do not contain consolidated financial information as the parent of a group.

Notes to the financial statements

2 Basis of preparation and significant accounting policies (continued)

2.1 Basis of preparation (continued)

The Bank is not required by the Cyprus Companies Law, Cap. 113, to prepare consolidated financial statements because the ultimate parent company, Eurobank Ergasias Services and Holdings S.A., publishes consolidated financial statements in accordance with Generally Accepted Accounting Principles in Greece and the Bank does not intend to issue consolidated financial statements for the year ended 31 December 2022.

The European Commission has concluded that since parent companies are required by the EU Accounting (2013/34/EU) Directive to prepare separate financial statements and since the Cyprus Companies Law, Cap. 113, requires the preparation of such financial statements in accordance with IFRS as adopted by the EU, the provisions in IFRS 10 'Consolidated Financial Statements' requiring the preparation of consolidated financial statements in accordance with IFRS do not apply. The consolidated financial statements of Eurobank Ergasias Services and Holdings S.A. are available at its website (www.eurobankholdings.gr).

The Bank's presentation currency is the Euro (€) being its functional currency. Except as indicated, financial information presented in Euro has been rounded to the nearest thousand.

Going concern considerations

The annual financial statements have been prepared on a going concern basis, as the Board of Directors considered as appropriate, taking into consideration the following:

a) Position of the Group

2022 was marked by the war in Ukraine, which gave rise to a global, but predominantly European, energy crisis, added to the mounting inflationary pressures, and led to widespread economic uncertainty and increased volatility in the global economy and financial markets. Nevertheless, the post-pandemic recovery continued for a second consecutive year in Greece, with its GDP growth overperforming that of most of its EU peers. According to the Hellenic Statistical Authority ("ELSTAT") provisional data, the Greek economy expanded by 5,9% on an annual basis in 2022. The inflation rate, as measured by the change in the 12-month average Harmonised Index of Consumer Prices ("HICP"), increased to 9,3% in 2022 according to ELSTAT, Provisional ELSTAT data shows that the average monthly unemployment in 2022 decreased to 12,4% from 14,8% in 2021.

A significant boost to growth in Greece and in other countries of presence is expected from European Union funding, mainly under the Next Generation EU ("NGEU") instrument and the Multiannual Financial Framework ("MFF") 2021–2027, EU's long-term budget.

On the monetary policy front, although net bond purchases under the temporary Pandemic Emergency Purchase Programme ("PEPP") ended in March 2022, as scheduled, the European Central Bank ("ECB") will continue to reinvest principal from maturing securities at least until the end of 2024, including purchases of Greek Government Bonds ("GGBs") over and above rollovers of redemptions.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)

Going concern considerations (continued)

a) Position of the Group (continued)

Furthermore, the Governing Council of the ECB, in line with its strong commitment to its price stability mandate, has proceeded with six rounds of interest rate hikes (in July, September, October, December 2022, and February and March 2023), raising the three key ECB interest rates by 300 basis points in aggregate, and approved a new instrument (the "Transmission Protection Instrument" – TPI) aimed at preventing fragmentation in the sovereign bonds market.

Regarding the outlook for the next 12 months the major macroeconomic risks and uncertainties in Greece and the region are as follows: (a) the ongoing Russia — Ukraine war and its ramifications on regional and global stability and security, as well as the European and Greek economy, (b) a potential prolongation of the ongoing inflationary wave, and its impact on economic growth (c) the ongoing and potential upcoming central bank interest rate hikes worldwide, and in the euro area in particular, that may exert upward pressures on sovereign and private borrowing costs, especially those of highly indebted borrowers, deter investments, increase volatility in the financial markets and lead economies to slow down, (d) the recent banking sector turmoil to continue and expand in the euro area, affecting customers' confidence, (e) the persistently large current account deficits and the prospect of them becoming once again a structural feature of the country's growth model, (f) the absorption capacity of the NGEU and MFF funds and the attraction of new investments in the country, (g) a delay in the implementation of planned reforms, projects and the budget's fiscal agenda due to the possibility of the 2023 national elections resulting in an inability or delay to form a governmentwith solid Parliament majority, (h) the geopolitical developments in the near region, and (i) the evolution of the pandemic, and the probability of emergence of new Covid-19 variants that could further impact economic growth.

Materialisation of the above risks, would have potentially adverse effects on the fiscal planning of the Greek government, as it could decelerate the pace of expected growth, asset quality, solvency and profitability of the Greek banking sector. The Group Management and Board, mindful of the recent banking turmoil across some markets, has done a proactive internal review to re-assure itself of the continued resilience of Eurobank business model to such possible external shocks and is pleased that this model is well supported by sound business practices, diversified activities and prudent risk management approaches.

The resulting stability of the Group's business operating model is also further well-reflected by, among others, its financial position and performance as analysed below and supported by the ECB's capacity to provide credit institutions with liquidity through the established Eurosystem's operations, if this is needed. In this context, the Group is continuously monitoring the developments on the macroeconomic, financial and geopolitical fronts as well as the evolution of its asset quality and liquidity KPIs and has increased its level of readiness, so as to accommodate decisions, initiatives and policies to protect its capital and liquidity standing as well as the fulfilment, to the maximum possible degree, of its strategic and business goals in accordance with the business plan for 2023–2025.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)

Going concern considerations (continued)

b) The Cyprus economy

The Cypriot economy proved remarkably resilient in 2022, even in the face of growing economic and geopolitical uncertainties, mainly supported by strong private consumption, healthy employment, and increased savings during the pandemic, as well as robust investment on the back of the implementation of the Recovery and Resilience Plan (RRP).

According to the Statistical Service of Cyprus (CYSTAT), the GDP for the year 2022 is provisionally estimated at €27,01 billion at current prices compared to €24,02 billion in 2021 and €24,23 billion at volume measures (constant prices) for the year 2022, compared to €22,94 billion in 2021. The growth rate in real terms is estimated at 5,6% in 2022, compared to 6,6% in 2021 and -4,4% in 2020.

Downward pressures are expected to intensify causing economic activity to decelerate in 2023 due to the global economic slowdown, rising interest rates, high prices and inflation. Increasing interest rates and weaker purchasing power due to inflation are expected to negatively affect consumption, corporate investments, and residential construction. In its latest macroeconomic forecasts, published March 2023, the Central Bank of Cyprus ("CBC") projects that the economy will grow by 2,6% in 2023. For 2024 and 2025 the CBC expects Cyprus' GDP to increase by 3,0% and 3,1% respectively. According to the winter European Commission economic forecasts for Cyprus, elevated prices and tightening monetary policy are expected to weigh on real GDP growth, which is forecast to slow down to 1,6% in 2023, before accelerating to 2,1% in 2024.

One of the main contributors for the better-than-expected growth in 2022 was the tourism sector. Arrivals and revenues from tourism reached more than 80%, and 91% of the 2019 pre-pandemic levels, respectively in comparable 2019 periods. For the 12 month period of January — December 2022, arrivals of tourists totaled 3,2 million compared to 1,94 million in the corresponding period of 2021, 0,63 million in the period of January — December 2020 and 3,98 million arrivals in the period of January — December 2019. For the period of January — December 2022, revenue from tourism is estimated at €2,44 billion compared to €1,51 billion in the corresponding period of 2021, €392 million during the period of January — December 2020 and to €2,68 billion in the same period of 2019.

Inflation remains high even though price pressures show some signs of abating. In February 2023 the HICP rose by 6,7% YoY and 0,8% MoM. For the period January – February 2023 the HICP rose by 6,8% compared to the corresponding period of the previous year. In February 2023, the Consumer Price Index inflation stood at 6,7%. Inflation is expected to decrease further, as falling gas and oil prices reduce energy inflation and supply disruptions ease. According to CBC forecasts, inflation is forecasted to decline to 3,3% in 2023, 2,3% in 2024 and 1,9% in 2025.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)

Going concern considerations (continued)

b) The Cyprus economy (continued)

Employment conditions appear softer amid the international uncertainty. According to Eurostat, in January 2023 the seasonally adjusted unemployment rate in Cyprus stood at 7,4% compared to 6% in January 2022. The CBC expects the unemployment rate to reduce to 6,6% in 2023, 5,9% in 2024 and 5,5% in 2025.

Cyprus' fiscal performance came in stronger than expected over 2021 and 2022, supported by the robust economic performance. According to CYSTAT's preliminary fiscal results, the General Government fiscal balance presented a surplus of €609,5 million (2,3% of GDP) for the period of January – December 2022, as compared to a deficit of €402,8 million (1,7% of GDP) that was recorded during the period of January – December 2021. The strong performance for 2012, was a result of robust revenues, which increased by 14,5% to €11,4 billion and a slower increase in expenditure, which rose by 4,1% to €10,8 billion.

Central Government total debt amounted to €23,1 billion in December 2022 recording a 3,9% decrease compared to December 2021. The Government Debt/GDP ratio is seen at 85% as of the end of 2022, recording a significant improvement from the 104% recorded in 2021 and the 115% in 2020, on the back of stronger than expected fiscal performance and high reserves. According to the Public Debt Management Office's Annual Funding Plan, €1,52 billion of new debt is expected to be issued in 2023, including a €1 billion new bond issuance through the EMTN program. The new issue will replace €1 billion million of debt which will mature in July 2023 and has a coupon of 3,75%.

According to the European Commission economic forecasts for Cyprus (published in November 2022), the budget surplus is expected to reach around 1,1% of GDP in 2023, and 1,6% in 2024. The debt-to-GDP ratio is expected to decrease over the coming years, supported by positive expected nominal GDP growth and primary surpluses.

Cyprus credit outlook continued improving. Early 2023, Fitch upgraded Cyprus to BBB from BBB-, with a stable outlook. In July 2022 Standard and Poor upgraded the rating of Cyprus to BBB from BBB-, maintaining a stable outlook, while in August 2022 Moody's affirmed Ba1 rating but upgraded the outlook to positive from stable. Moody's also raised the macro profile of Cyprus to "Moderate-", from "Weak+". In their decisions, rating agencies cite the resiliency of Cypriot economy to external shocks, the improved asset quality in the banking sector, institutional strength and policy credibility backed by the country's Eurozone membership and the improving fiscal position with general government debt expected to decline considerably in the coming years on fiscal consolidation and dynamic economic activity.

The reduction in the total NPEs in the banking industry continued in the last months of 2022, albeit with a slower pace. Data published by the CBC showed that in December 2022 the non-performing loans in Cyprus decreased by €376,5 million MoM to €2,31 billion (NPL ratio at 9,47%) from €2,68 billion (NPL ratio at 10,50%) in November 2022. NPEs stood at €2,96 billion (NPL ratio at 10,99%) as at the end of 2021 and at €5,11 billion (NPL ratio at 17,70%) as at the end of 2020.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)

Going concern considerations (continued)

b) The Cyprus economy (continued)

The Global as well as the Cypriot economy faces headwinds in the coming years. The outlook remains uncertain with risks from a volatile geopolitical environment, rising inflation and restrictive monetary policy threatening to push the global economy to recession. Eurobank Cyprus continues to monitor closely the different risks and the shifts in the macroeconomic and geopolitical outlook so that they are effectively and timely managed. In addition, the Bank complies with the coordinated sanctions imposed by the USA, EU, UK and other countries against Russia, Belarus and to specific legal entities and physical persons.

c) Going concern assessment

Taking into consideration the factors mentioned earlier on, as well as the Bank's financial, capital and liquidity position as described in the Management Report, the Board of Directors has been satisfied that the financial statements of the Bank can be prepared on a going concern basis.

2.1.1 New and amended standards and interpretations

The Bank applied for the first time certain standards and amendments, which are effective for annual periods beginning on 1 January 2022. The Bank has not early adopted any other standard, interpretation or amendment that has been issued but is not yet effective.

(a) New and amended standards adopted by the Bank as of 1 January 2022

IFRS 3, Amendments, Reference to the Conceptual Framework

The amendments to IFRS 3 "Business Combinations" updated a reference to the current version of Conceptual Framework while added a requirement that, for obligations within the scope of IAS 37 "Provisions, Contingent Liabilities and Contingent Assets", an acquirer applies IAS 37 to determine whether at the acquisition date a present obligation exists as a result of past events. In addition, for a levy that would be within the scope of IFRIC 21 Levies, the acquirer applies IFRIC 21 to determine whether the obligating event that gives rise to a liability to pay the levy exists at the acquisition date.

Moreover, the issued amendments added a new paragraph to IFRS 3 to clarify that contingent assets do not qualify for recognition in a business combination at the acquisition date.

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

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)
- 2.1.1 New and amended standards and interpretations (continued)
- (a) New and amended standards adopted by the Bank as of 1 January 2022 (continued)

Annual improvement to IFRSs 2018-2020 cycle: IFRS1, IFRS9 and IFRS 16

The improvements introduce changes to several standards. The amendments that are relevant to the Bank's activities are set out below:

The amendment to IFRS 1 "First-time Adoption of International Financial Reporting Standards" provides additional relief to a subsidiary which becomes a first-time adopter later than its parent in respect of accounting for cumulative translation differences. As a result, the amendment allows entities that have elected to measure their assets and liabilities at carrying amounts recorded in their parent's books to also measure any cumulative translation differences using the amounts reported in the parent's consolidated financial statements. This amendment also applies to associates and joint ventures that have taken the same IFRS 1 exemption.

The amendment to IFRS 9 "Financial Instruments" clarifies which fees should be included in the 10% test for derecognition of financial liabilities. The fees to be included in the assessment are only those paid or received between the borrower (entity) and the lender, including fees paid or received by either the borrower or lender on the other's behalf. The amendment is applied prospectively to modifications and exchanges that occur on or after the date the entity first applies the amendment.

The amendment to IFRS 16 "Leases" removes the illustration of the reimbursement of leasehold improvements, in order to avoid any potential confusion about the treatment of lease incentives.

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

IAS 37, Amendments, Onerous Contracts - Costs of Fulfilling a Contract

The amendments to IAS 37 'Provisions, Contingent Liabilities and Contingent Assets' clarify which costs to include in determining the cost of fulfilling a contract when assessing whether a contract is onerous. In particular, the direct costs of fulfilling a contract include both the incremental costs and an allocation of other costs directly related to fulfilling contracts' activities. General and administrative costs do not relate directly to a contract and are excluded unless they are explicitly chargeable to the counterparty under the contract.

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

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)
- 2.1.1 New and amended standards and interpretations (continued)
- (b) New standards, amendments to standards and interpretations not yet adopted by the Bank

A number of new standards and amendments to existing standards are effective after 2022, as they have not yet been endorsed by the EU, or have not been early applied by the Bank. Those that may be relevant to the Bank are set out below:

IAS 8, Amendments, Definition of Accounting Estimates (effective 1 January 2023)

The amendments in IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors" introduced the definition of accounting estimates and include other amendments to IAS 8 which are intended to help entities distinguish changes in accounting estimates from changes in accounting policies.

The amendments clarify (a) how accounting policies and accounting estimates relate to each other by (i) explaining that accounting estimates are used in applying accounting policies and (ii) making the definition of accounting policies clearer and concise and, (b) that selecting an estimation or valuation technique and choosing the inputs to be used constitutes making an accounting estimate.

The adoption of the amendments is not expected to impact the financial statements.

Amendments to IAS 1 Presentation of Financial Statements and IFRS Practice Statement 2: Disclosure of Accounting policies (effective 1 January 2023)

IASB issued amendments to IAS 1 "Presentation of Financial Statements" that require entities to disclose their material accounting policies rather than their significant accounting policies.

According to IASB, accounting policy information is material if, when considered together with other information included in an entity's financial statements, it can reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements.

Furthermore, the amendments clarify how an entity can identify material accounting policy information, while provide examples of when accounting policy information is likely to be material. The amendments to IAS 1 also clarify that immaterial accounting policy information need not be disclosed. However, if it is disclosed, it should not obscure material accounting policy information. To support these amendments the Board has also developed guidance and examples to explain and demonstrate the application of the 'four-step materiality process' described in IFRS Practice Statement 2 Making Materiality Judgements to accounting policy disclosures, in order to support the amendments to IAS 1.

The adoption of the amendments is not expected to impact the financial statements.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.1 Basis of preparation (continued)
- 2.1.1 New and amended standards and interpretations (continued)
- (b) New standards, amendments to standards and interpretations not yet adopted by the Bank (continued)

IAS 1, Amendments, Classification of Liabilities as Current or Non-Current (effective 1 January 2024, not yet endorsed by EU)

The amendments, published in January 2020, affect only the presentation of liabilities in the balance sheet and provide clarifications over the definition of the right to defer the settlement of a liability, while they make clear that the classification of liabilities as current or non-current should be based on rights that are in existence at the end of the reporting period. In addition, it is clarified that the assessment for liabilities classification made at the end of the reporting period is not affected by the expectations about whether an entity will exercise its right to defer settlement of a liability. The Board also clarified that when classifying liabilities as current or non-current, an entity can ignore only those conversion options that are recognised as equity.

In October 2022, the IASB issued *Non-current Liabilities with Covenants (Amendments to IAS 1)* with respect to the classification (as current or non-current), presentation and disclosures of liabilities for which an entity's right to defer settlement for at least 12 months is subject to the entity complying with conditions after the reporting period. The amendments to IAS 1 specify that covenants to be complied with after the reporting date do not affect the classification of debt as current or non-current at the reporting date. Instead, the amendments require a company to disclose information about these covenants in the notes to the financial statements.

The adoption of the amendments is not expected to impact the financial statements.

IAS 12, Amendments, Deferred Tax related to Assets and Liabilities arising from a Single Transaction (effective 1 January 2023)

The amendments clarify that the exemption on initial recognition set out in IAS 12 'Income Taxes' does not apply for transactions such as leases and decommissioning obligations that, on initial recognition, give rise to equal amounts of taxable and deductible temporary differences. Accordingly, for such transactions an entity is required to recognise the related deferred tax asset and liability, with the recognition of any deferred tax asset being subject to the recoverability criteria in IAS 12. The amendments apply to transactions that occur on or after the beginning of the earliest comparative period presented.

The adoption of the amendments is not expected to impact the financial statements.

IFRS 16, Amendment, Lease Liability in a Sale and Leaseback (effective 1 January 2024, not yet endorsed by EU)

The amendment requires a seller-lessee to subsequently measure lease liabilities arising in a sale and leaseback transaction in a way that it does not recognise any amount of the gain or loss that relates to the right of use it retains. Any gains and losses relating to the full or partial termination of a lease continue to be recognised when they occur. The amendment does not change the accounting for leases unrelated to sale and leaseback transactions.

The adoption of the amendment is not expected to impact the financial statements.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies
- 2.2.1 Foreign currency translation
- (i) Functional and presentation currency

Items included in the Bank's financial statements are measured using the currency of the primary economic environment in which the entity operates ("the functional currency"). The financial statements are presented in Euro (€), which is the functional and presentation currency of the Bank.

(ii) Transactions and balances

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions are recognised in the income statement.

Monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the exchange rates prevailing at each reporting date and exchange differences are recognised in the income statement, except when deferred in equity as qualifying cash flow or net investment hedges.

Non-monetary assets and liabilities are translated into the functional currency at the exchange rates prevailing at initial recognition, except for non-monetary items denominated in foreign currencies that are measured at fair value which are translated at the rate of exchange at the date the fair value is determined. The exchange differences relating to these items are treated as part of the change in fair value and are recognised in the income statement or recorded directly in equity depending on the classification of the non-monetary item.

2.2.2 Derivative financial instruments and hedge accounting

Derivative financial instruments, that mainly include foreign exchange contracts, forward currency agreements, currency and interest rate options (both written and purchased), as well as currency and interest rate swaps, are initially recognised in the balance sheet at fair value, on the date on which the derivative contracts are entered into, and are subsequently re-measured at their fair value. All derivatives are carried as assets when fair value is positive and as liabilities when fair value is negative.

Fair values of derivatives are determined based on quoted market prices, including recent market transactions, or by using other valuation techniques, as appropriate. The principles for the fair value measurement of financial instruments, including derivative financial instruments, are described in notes 2.2.15 and 4.5.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.2 Derivative financial instruments and hedge accounting (continued)

Embedded derivatives

Embedded derivatives are components of hybrid contracts that also include non-derivative hosts with the effect that some of the cash flows of the combined instruments vary in a way similar to standalone derivatives.

Financial assets that contain embedded derivatives are recognised in the balance sheet in their entirety in the appropriate classification category, following instruments' assessment of their contractual cash flows and their business model as described in note 2.2.12.

On the other hand, derivatives embedded in financial liabilities, are treated as separate derivatives when their risks and economic characteristics are not closely related to those of the host contract and the host contract is not itself carried at fair value through profit or loss. These embedded derivatives are measured at fair value with changes in fair value recognised in the income statement.

The use of derivative financial instruments is inherent in the Bank's activities and aims principally at managing risks effectively.

Accordingly, the Bank, as part of its risk management strategy, may enter into transactions with external counterparties to hedge partially or fully interest rate, foreign currency, equity and other exposures that are generated from its activities.

The objectives of hedging with derivative financial instruments include:

- Reduce interest rate exposure that is in excess of the Bank's interest rate appetite
- Manage efficiently interest rate risk by hedging the changes to movements of the benchmark interest rates represented by the prevailing reference rates
- Manage future variable cash flows

Hedge accounting

The Bank has elected, as a policy choice permitted under IFRS 9, to continue to apply hedge accounting in accordance with IAS 39, until the project of accounting of macro hedging activities is completed by the IASB.

For hedge accounting purposes, the Bank forms a hedging relationship between a hedging instrument or group of hedging instrument and a related item or group of items to be hedged. A hedging instrument is a designated derivative or group of derivatives, or a designated non-derivative financial asset or financial liability whose fair value or cash flows are expected to offset changes in the fair value or cash flows of a designated hedged item or group of items.

Specifically, the Bank designates certain derivatives as hedges of the exposure to changes in the fair value of recognised assets or liabilities on a single or portfolio basis or unrecognised firm commitments (fair value hedging).

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.2 Derivative financial instruments and hedge accounting (continued)

Hedge accounting (continued)

In order to apply hedge accounting specified criteria should be met. Accordingly, at the inception of the hedge accounting relationship, the Bank documents the relationship between hedging instruments and hedged items, as well as its risk management objective and strategy for undertaking various hedge transactions, together with the method that will be used to assess the effectiveness of the hedging relationship. The Bank also documents its assessment, both at inception of the hedge and on an ongoing basis, of whether the derivatives that are used in the hedging transactions are highly effective in offsetting changes in fair values or cash flows of hedged items and whether the actual results of each hedge are within a range of 80-125%. If a relationship does not meet the abovementioned hedge effectiveness criteria, the Bank discontinues hedge accounting prospectively. Similarly, if the hedging derivative expires or is sold, terminated or exercised, or the hedge designation is revoked, then hedge accounting is discontinued prospectively. In addition, the Bank uses other derivatives, not designated in qualifying hedge relationships, to manage its exposure primarily to interest rate and foreign currency risks. Non qualifying hedges are derivatives entered into as economic hedges of assets and liabilities for which hedge accounting is not applied. The said derivative instruments are classified along with those held for trading purposes.

The method of recognising the resulting fair value gain or loss depends on whether the derivatives are designated and qualify as hedging instruments, and if so, the nature of the item being hedged.

Furthermore, the Bank may designate groups of items as hedged items, by aggregating recognised assets or liabilities or unrecognised but highly probable transactions of similar risk characteristics that share the exposure for which they are hedged. Although the overall risk exposures may be different for the individual items in the group, the specific risk being hedged is inherent in each of the items in the group.

The Bank has applied the Phase 1 and Phase 2 IBOR reform amendments to IFRS 9, IAS 39 and IFRS 7, that provide temporary reliefs on hedging relationships during the period before the replacement of an existing interest rate benchmark with an alternative risk-free rate (RFR). Based on the above reliefs, for the purpose of determining whether a forecast transaction is highly probable, or a hedging relationship is expected to be highly effective, the Bank assumes that the benchmark interest rate does not change as a result of the IBOR reform. In addition, the Bank, is not required to discontinue hedge accounting if the hedge falls outside the 80–125% range during the period of uncertainty arising from the reform. Furthermore, in case of hedges where the hedged item or hedged risk is a noncontractually specified benchmark portion of interest rate risk, following the IBOR reform reliefs, it is assumed that the designated risk portion only needs to be separately identifiable at the inception of the hedging relationship and not on a going basis.

The reliefs cease to apply once certain conditions are met i.e. at the earlier of (a) when the uncertainties arising from the IBOR reform are no longer present with respect to the timing and the amount of the benchmark rate-based cash flows of the hedged items or hedging instruments and (b) when the hedging relationships to which the reliefs apply are discontinued.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.2 Derivative financial instruments and hedge accounting (continued)

Hedge accounting (continued)

Finally, the amendments introduce an exception to the existing requirements so that changes in the formal designation and documentation of a hedge accounting relationship or to the method for assessing hedge effectiveness due to modifications required by IBOR reform will not result in the discontinuation of hedge accounting or the designation of a new hedging relationship.

(i) Fair value hedging

The Bank applies fair value hedging to hedge exposures primarily to changes in the fair value attributable to interest rate risk with respect to the applicable benchmark rate and currency risk.

Hedged items

The items that qualify for fair value hedge accounting include financial assets and liabilities measured at amortised cost such as fixed rate debt securities, fixed rate term deposits, fixed rate debt securities in issue, interest rate options embedded in portfolios of floating-rate loans and debt securities (such as purchased interest rate floors), portfolios of fixed rate amortising loans (macro hedging) including securitised notes issued and held by the Group, as well as fixed rate debt securities classified as FVOCI.

Hedge effectiveness assessment

The Bank uses the dollar-offset method at inception (prospective measurement) and on an ongoing basis (retrospective measurement), in order to assess the effectiveness of fair value hedges. This is a quantitative method that involves the comparison of the change in the fair value of the hedging instrument with the change in the fair value of the hedged item attributable to the hedged risk. The above comparison constitutes the dollar-offset ratio and should be within the range of 80% -125% for the hedge to be highly effective. Even if a hedge is not expected to be highly effective in a particular period, hedge accounting is not precluded if effectiveness is expected to remain sufficiently high over the life of the hedge.

The Bank may also use the hypothetical derivative method, an approach to the dollar offset method, mainly applied in portfolio hedges that carry embedded derivatives, where the hedged risk is modelled through hypothetical derivatives, which replicate the embedded derivative. The fair value of the hypothetical derivative is used as a proxy for the net present value of the hedged future cash flows against which changes in value of the actual hedging instrument are compared to assess effectiveness and measure ineffectiveness. Hedge ineffectiveness may arise in case of potential differences in the critical terms between the hedged item and the hedging instrument such as maturity, interest rate reset frequency and discount curves as well as differences between expected and actual cash flows.

In addition, for hedging relationships where the critical terms of the hedged item match the ones of the hedging instrument such as coupon, maturity, and payment frequency, it is presumed that by construction, effectiveness is expected to be within the range of 80% to 125%.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.2 Derivative financial instruments and hedge accounting (continued)

Hedge accounting (continued)

(i) Fair value hedging (continued)

Fair value hedging adjustments and discontinuation of hedge accounting

Changes in the fair value of derivatives that are designated and qualify as fair value hedges are recorded in the income statement, under net trading income, together with the changes in the fair value of the hedged assets or liabilities that are attributable to the hedged risk (fair value hedging adjustments). Fair value hedging adjustments to the hedged items measured at amortised cost are recorded as part of their carrying value in the balance sheet, with the exception of hedging adjustments for portfolios of fixed rate assets in the context of macro-hedging (see below). If the hedged item would otherwise be measured at cost or amortised cost, then its carrying amount is adjusted accordingly.

The Bank discontinues hedge accounting prospectively in case the hedging instrument expires or is sold, terminated or exercised, the hedge no longer meets the qualifying criteria for hedge accounting, or designation is revoked. In such cases, any adjustment to the carrying amount of the hedged item, for which the effective interest method is applied, is amortised to profit or loss over the remaining period to maturity with amortisation commencing no later than when the hedged item ceases to be adjusted for changes in its fair value attributable to the risk being hedged. On hedge discontinuation, any hedging adjustment made previously to a hedged financial instrument for which the effective interest method is used is amortised to the income statement by adjusting the effective interest rate of the hedged item from the date on which amortisation begins. If the hedged item is derecognised, the unamortised fair value adjustment is recognised immediately in the income statement.

(ii) Derivatives not designated as hedging instruments for hedge accounting purposes

Changes in the fair value of derivative financial instruments that are entered into for trading purposes or as economic hedges of assets, liabilities or net positions in accordance with the Bank's hedging objectives that may not qualify for hedge accounting, are recognised in the income statement under "Net trading income".

The fair values of derivative instruments held for trading, including those entered into as economic hedges, and hedge accounting purposes are disclosed in note 15.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.3 Offsetting financial instruments

Financial assets and liabilities are offset and the net amount presented in the balance sheet when, and only when, the Bank has a legally enforceable right to set off the recognised amounts and intends either to settle them on a net basis, or to realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted under IFRS, or for gains and losses arising from a group of similar transactions such as in the Bank's trading activity.

2.2.4 Interest income and expense

Interest income and expense is recognised in the income statement for all interest bearing financial instruments on an accrual basis, using the effective interest rate (EIR) method. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the gross carrying amount of the financial asset or to the amortised cost of a financial liability. When calculating the EIR for financial instruments other than purchased or originated credit-impaired financial assets ("POCI"), the Bank estimates future cash flows considering all contractual terms of the financial instrument but does not consider expected credit losses. For POCI financial assets, the Bank calculates the credit-adjusted EIR, which is the interest rate that upon the original recognition of the POCI financial asset discounts the estimated future cash flows (including expected credit losses) to the fair value of the POCI asset.

The amortised cost of a financial asset or liability is the amount at which it is measured upon initial recognition minus principal repayments, plus or minus cumulative amortisation using the EIR (as described above) and for financial assets it is adjusted for the expected credit loss allowance ("ECL"). The gross carrying amount of a financial asset is its amortised cost before adjusting for ECL allowance.

The EIR calculation includes all fees and points paid or received that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts. Transaction costs include incremental costs that are directly attributable to the acquisition or issue of a financial asset and liability.

The Bank calculates interest income and expense by applying the EIR to the gross carrying amount of non-impaired financial assets (exposures in Stage 1 and 2) and to the amortised cost of financial liabilities respectively.

For financial assets that have become credit-impaired subsequent to initial recognition (exposures in Stage 3), the Bank calculates interest income by applying the effective interest rate to the amortised cost of the financial asset (i.e. gross carrying amount adjusted for the ECL allowance). If the asset is no longer credit-impaired, then the EIR is applied again to the gross carrying amount with the exception of POCI assets for which interest income does not revert to gross basis calculation.

For inflation-linked instruments the Bank recognises interest income and expense by adjusting the EIR on each reporting period due to changes in expected future cash flows, incorporating changes in inflation expectations over the term of the instruments. The adjusted EIR is applied in order to calculate the new gross carrying amount on each reporting period.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.4 Interest income and expense (continued)

The changes to the basis for determining the financial instruments' contractual cash flows, required in the context of IBOR reform, are accounted for as an update to the instruments' EIR.

Presentation

Interest income and expense is presented separately in the income statement for all interest bearing financial instruments within net interest income.

Interest income calculated using the effective interest method presented in the income statement includes:

- interest on financial assets and financial liabilities measured at amortised cost;
- interest on debt instruments measured at FVOCI;
- the effective portion of fair value changes in qualifying hedging derivatives designated in cash flow hedges of variability in interest cash flows, in the same period as the hedged cash flows affect interest income/expense;
- the effective portion of fair value changes in qualifying hedging derivatives designated in fair value hedges of interest rate risk; and
- negative interest on financial liabilities measured at amortised cost.

Interest expense presented in the income statement includes:

- financial liabilities measured at amortised cost;
- the effective portion of fair value changes in qualifying hedging derivatives designated in cash flow hedges of variability in interest cash flows, in the same period as the hedged cash flows affect interest income/expense;
- negative interest on financial assets measured at amortised cost; and
- interest expense on lease liabilities.

2.2.5 Fees and commissions

Fee and commission received or paid that are integral to the EIR on a financial asset or financial liability are included in the EIR.

Other fee and commission income is recognised over time as the related services are being provided to the customer, to the extent that it is highly probable that a significant reversal of the revenue amount recognised will not occur. Transaction-based fees such as foreign exchange transactions, imports-exports, remittances and bank charges are recognised at the point in time when the transaction takes place. Other fee and commission expenses relate mainly to transaction and service fees, which are expensed as the services are received.

In the case of a contract with a customer that results in the recognition of a financial instrument in the Bank's financial statements which may be partially in the scope of IFRS 9 and partially in the scope of IFRS 15, the Bank first applies IFRS 9 to separate and measure the part of the contract that is in the scope of IFRS 9 and subsequently applies IFRS 15 to the residual part.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.6 Net trading income

"Net trading income" comprises gains less losses related to derivative financial instruments.

2.2.7 Net gains from other financial instruments

Net gains from other financial instruments relates to financial assets at FVOCI, financial assets at AC and financial assets mandatorily measured at FVTPL. The line item includes fair value changes, gains and losses on disposal and impairment allowances.

2.2.8 Income tax

Income tax comprises current and deferred tax. It is recognised in the income statement except to the extent that it relates to items recognised directly in equity or OCI.

(i) Current income tax

Current income tax comprises the expected tax payable or receivable on the taxable income or loss for the year and any adjustment to the tax payable or receivable in respect of previous years. The amount of current tax payable or receivable is the best estimate of the tax amount expected to be paid or received that reflects uncertainty related to income taxes, if any.

It is calculated using tax rates enacted or substantively enacted at the balance sheet date.

Current tax assets and liabilities are offset only if certain criteria are met.

(ii) Deferred tax

Deferred tax is provided in full, using the liability method, on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the financial statements. Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realised or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date. The principal temporary differences arise from impairments relating to loans and advances to customers, depreciation of property and equipment and amortisation of computer software.

Deferred tax assets are recognised to the extent it is probable that future taxable profit will be available against which the temporary differences can be utilised. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. Any such reduction is reversed to the extent that it becomes probable that sufficient taxable profit will be available. The Bank recognises a previously unrecognised deferred tax asset to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.8 Income tax (continued)
- (ii) Deferred tax (continued)

Deferred tax related to debt securities at FVOCI is recognised in other comprehensive income, and is subsequently recognised in the income statement together with the deferred gain or loss.

Deferred tax assets and liabilities are offset only if certain criteria are met.

(iii) Uncertain tax positions

The Bank determines and assesses all material tax positions taken, including all, if any, significant uncertain positions, in all tax years that are still subject to assessment by the tax authorities. In evaluating tax positions, the Bank examines all supporting evidence (Ministry of Finance circulars, individual rulings, case law, past administrative practices, ad hoc tax/legal opinions etc.) to the extent they are applicable to the facts and circumstances of the particular Bank's case/transaction.

In addition, judgments concerning the recognition of a provision against the possibility of losing some of the tax positions are highly dependent on advice received from internal/external legal counselors. For uncertain tax positions with a high level of uncertainty, the Bank recognises, on a transaction by transaction basis: (a) a provision against tax receivable which has been booked for the amount of income tax already paid but further pursued in courts or (b) a liability for the amount which is expected to be paid to the tax authorities. The Bank presents in its balance sheet all uncertain tax balances as current or deferred tax assets or liabilities.

2.2.9 Property and equipment

Property and equipment are stated at cost less accumulated depreciation and accumulated impairment losses. Cost includes expenditure that is directly attributable to the acquisition of the asset. Subsequent expenditure is recognised in the asset's carrying amount only when it is probable that future economic benefits will flow to the Bank and the cost of the asset can be measured reliably. All other repair and maintenance costs are recognised in the income statement as incurred.

Depreciation is calculated using the straight-line method to write down the cost of property and equipment, to their residual values, over their estimated useful life. The estimated useful economic lives are as follows:

Motor vehicles and motor cycles: 5 years

• Equipment: 5 to 12 years

Leasehold improvements: 12 years

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.9 Property and equipment (continued)

Depreciation methods, residual values and useful lives are reviewed, and adjusted if appropriate, at each balance sheet date.

An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount (note 2.2.11).

Gains and losses on disposal of property and equipment are determined by comparing proceeds with carrying amount and are included in "other operating expenses" in the income statement.

2.2.10 Intangible assets

Computer software

Acquired computer software licenses/programs are capitalised on the basis of the costs incurred to acquire and bring to use the specific software and measured at cost less accumulated amortisation and any accumulated impairment losses.

Expenditure on internally developed software is recognised as an asset when the Bank is able to demonstrate: that the product is technically and commercially feasible, its intention and ability to complete the development and use the software in a manner that will generate future economic benefits, and that it can reliably measure the costs to complete the development. The capitalised costs of internally developed software include all costs directly attributable to developing the software and capitalised borrowing costs, and are amortised over its useful life. Internally developed software is stated at capitalised cost less accumulated amortisation and any accumulated impairment losses.

Subsequent expenditure on software assets is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure is expensed as incurred.

Software is amortised on a straight-line basis in profit or loss over its estimated usefule life, from the date on which it is available for use. The annual amortisation rates used range between 8% and 33,33%. The useful life of the Bank's core system is 15 years.

Amortisation methods, residual values and useful lives are reviewed, and adjusted if appropriate, at each balance sheet date.

Gains and losses on disposal of computer software are determined by comparing proceeds with carrying amount and are included in "other operating expenses" in the income statement.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.11 Impairment of non-financial assets

Non-financial assets, including property and equipment and intangible assets, are assessed for indications of impairment at each reporting date by considering both external and internal sources of information such as a significant reduction in the asset's value and evidence that the economic performance of the asset is or will be worse than expected. When events or changes in circumstances indicate that the carrying amount may not be recoverable, an impairment loss is recognised in the income statement for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use.

For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows, where applicable. Non-financial assets for which an impairment loss was recognised in prior reporting periods, are reviewed for possible reversal of such impairment at each reporting date.

2.2.12 Financial assets

Financial assets - Classification and measurement

The Bank classifies financial assets based on the business model for managing those assets and their contractual cash flow characteristics. Accordingly, financial assets are classified into one of the following measurement categories: amortised cost, fair value through other comprehensive income or fair value through profit or loss.

Purchases and sales of financial assets are recognised on trade date, which is the date the Bank commits to purchase or sell the assets. Loans and advances originated by the Bank are recognised when cash is advanced to the borrowers.

Financial Assets measured at Amortised Cost ("AC")

The Bank classifies and measures a financial asset at AC only if both of the following conditions are met and is not designated as at FVTPL:

- (a) the financial asset is held within a business model whose objective is to collect contractual cash flows (hold-to-collect business model); and
- (b) the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding (SPPI).

These financial assets are recognised initially at fair value plus or minus direct and incremental transaction costs and fees received that are attributable to the acquisition of these assets, and are subsequently measured at amortised cost, using the EIR method (as described in note 2.2.4 above).

Interest income, realised gains and losses on derecognition, and changes in expected credit losses from assets classified at AC, are included in the income statement.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.12 Financial assets (continued)

Financial assets - Classification and measurement (continued)

Financial Assets measured at Fair Value through Other Comprehensive Income ("FVOCI")

The Bank classifies and measures a financial asset at FVOCI only if both of the following conditions are met and is not designated as at FVTPL:

- (a) the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets (hold-to-collect-and-sell business model); and
- (b) the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

Financial assets that meet these criteria are debt instruments and are measured initially at fair value, plus or minus direct and incremental transaction costs that are attributable to the acquisition of these assets.

Subsequent to initial recognition, FVOCI debt instruments are re-measured at fair value through OCI, except for interest income, related foreign exchange gains or losses and expected credit losses, which are recognised in the income statement. Cumulative gains and losses previously recognised in OCI are transferred from OCI to the income statement when the debt instrument is derecognised.

Equity Instruments designated at FVOCI

The Bank may make an irrevocable election to designate an equity instrument that is not held for trading at FVOCI. This designation, if elected, is made at initial recognition and on an instrument-by-instrument basis. Gains and losses on these instruments, including when derecognised, are recorded in OCI and are not subsequently reclassified to the income statement. Dividends received are recorded in the income statement.

Financial Assets measured at Fair Value through Profit and Loss ("FVTPL")

The Bank classifies and measures all other financial assets that are not classified at AC or FVOCI, at FVTPL. Accordingly, this measurement category includes debt instruments such as loans and debt securities that are held within the hold—to-collect ("HTC") or hold-to-collect-and-sell models ("HTCS"), but fail the SPPI assessment, equities that are not designated at FVOCI and financial assets held for trading. Derivative financial instruments are measured at FVTPL, with changes in fair value recognised in the income statement, unless they are designated as effective hedging instrumentswhere hedge accounting requirements under IAS 39 apply.

Furthermore, a financial asset that meets the above conditions to be classified at AC or FVOCI, may be irrevocably designated by the Bank at FVTPL at initial recognition, if doing so eliminates, or significantly reduces an accounting mismatch that would otherwise arise.

Financial assets measured at FVTPL are initially recorded at fair value and any unrealised gains or losses arising due to changes in fair value are included in the income statement.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.12 Financial assets (continued)

Financial assets - Classification and measurement (continued)

Business model and contractual characteristics assessment

The business model assessment determines how the Bank manages a group of assets to generate cash flows. That is, whether the Bank's objective is solely to collect contractual cash flows from the asset, to realise cash flows from the sale of assets, or both to collect contractual cash flows and cash flows from the sale of assets. In addition, the business model is determined after aggregating the financial assets into groups (business lines) which are managed similarly rather than at an individual instrument's level.

The business model is determined by the Bank's Executive Committee consistently with the operating model, considering how financial assets are managed in order to generate cash flows, the objectives and how performance of each portfolio is monitored and reported and any available information on past sales and on future sales' strategy, where applicable.

Accordingly, in making the above assessment, the Bank will consider a number of factors including the risks associated with the performance of the business model and how those risks are evaluated and managed, the related personnel compensation, and the frequency, volume and reasons of past sales, as well as expectations about future sales activity.

Types of business models

The Bank's business models fall into three categories, which are indicative of the key strategies used to generate returns.

The HTC business model has the objective to hold the financial assets in order to collect contractual cash flows. Sales within this model are monitored and may be performed for reasons which are not inconsistent with this business model. More specifically, sales of financial assets due to credit deterioration, as well as, sales close to the maturity are considered consistent with the objective of hold-to-collect contractual cash flows regardless of value and frequency. Sales for other reasons may be consistent with the HTC model such as liquidity needs in any stress case scenario or sales made to manage high concentration level of credit risk. Such sales are monitored and assessed depending on frequency and value to conclude whether they are consistent with the HTC model. Debt instruments classified within this business model include bonds, due from credit institutions and loans and advances to customers which are measured at amortised cost, subject to meeting the SPPI assessment criteria.

The HTCS model has the objective both to collect contractual cash flows and sell the assets. Activities such as liquidity management, interest yield and duration are consistent with this business model, while sales of assets are integral to achieving the objectives of this business model. Debt instruments classified within this business model include investment securities which are measured at FVOCI, subject to meeting the SPPI assessment criteria.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.12 Financial assets (continued)

Financial assets - Classification and measurement (continued)

Types of business models (continued)

Other business models include financial assets which are managed and evaluated on a fair value basis as well as portfolios that are held for trading. This is a residual category for financial assets not meeting the criteria of the business models of HTC or HTCS, while the collection of contractual cash flows may be incidental to achieving the business models' objective.

The Bank's business models are reassessed at least annually or earlier, if there is a sales' assessment trigger or if there are any changes in the Bank's strategy and main activities, as evidenced by the Bank's business plan, budget and NPE strategy.

Cash flow characteristics assessment

For the purposes of this assessment, "principal" is defined as the fair value of the financial asset on initial recognition. "Interest" is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs, as well as profit margin.

For a financial instrument to be measured at AC or FVOCI, its contractual terms must give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

In assessing whether the contractual cash flows are SPPI, the Bank will consider whether the contractual terms of the instrument are consistent with a basic lending arrangement i.e. interest includes only consideration for the time value of money, credit risk, other basic lending risks and a profit margin. On the initial recognition of a financial asset, an assessment is performed of whether the financial asset contains a contractual term that could change the amount or timing of contractual cash flows in a way that it would not be consistent with the above condition. Where the contractual terms introduce exposure to risk or volatility that are inconsistent with a basic lending arrangement, the related financial asset is considered to have failed the SPPI assessment and will be measured at FVTPL.

For the purpose of the SPPI assessment, the Bank considers the existence of various features, including among others, contractually linked terms, prepayment terms, deferred interest-free payments, extension and equity conversion options and terms that introduce leverage including index linked payments, features that change contractual cash flows based on the borrower meeting certain contractually specified environmental, social and governance (ESG) targets.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.12 Financial assets (continued)

Financial assets - Classification and measurement (continued)

Cash flow characteristics assessment (continued)

In case of special lending arrangements such as non-recourse loans, in its assessment of the SPPI criterion, the Bank considers various factors such as the nature of the borrower and its business, the pricing of the loans, whether it participates in the economic performance of the underlying asset and the extent to which the collateral represents all or a substantial portion of the borrower's assets. Moreover, for non-recourse loans, the Bank takes into consideration the borrower's adequacy of loss absorbing capital by assessing jointly the criteria of equity sufficiency, Loan to Value ratio ("LTV"), the Average Debt Service Coverage ratio ("ADSCR") as well as the existence of corporate and personal guarantees.

In certain cases, when the time value of money element is modified in that the financial asset's interest rate is periodically reset but the reset frequency does not match the tenor of the interest rate or when a financial asset's interest rate is periodically reset to an average of particular short-term and long-term interest rates, a quantitative assessment is performed (the "Benchmark Test") in order to determine whether the contractual cash flows are SPPI.

In particular, the Bank assesses the contractual cash flows of the "real instrument", whose interest rate is reset with a frequency that does not match the tenor of the interest rate, and those of the "benchmark instrument", which are identical in all respects except that the tenor of the interest rate matches exactly the interest period. If the undiscounted cash flows of the former are significantly different from the benchmark cash flows due to the modified time value of money element, the financial asset does not meet the SPPI criterion. In its assessment, the Bank considers both the effect of the modified time value of money element in each reporting period and cumulatively over the life of the instrument. This is done, as far as the lifetime of the instrument is concerned, by comparing the cumulative projected undiscounted cash flows of the real and the benchmark instrument.

In addition, for the purposes of the SPPI assessment, if a contractual feature could have an effect that is de-minimis on the contractual cash flows of the financial asset, it does not affect its classification. Moreover, a contractual feature is considered as not genuine by the Bank, if it affects the instrument's contractual cash flows only on the occurrence of an event that is extremely rare, highly abnormal and very unlikely to occur. In such a case, it does not affect the instrument's classification.

The Bank performs the SPPI assessment for its lending exposures on a product/type of contract basis for the portfolio where contracts are of standardised form, whereas for the remaining portfolio and debt securities, the assessment is performed on an individual basis.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.12 Financial assets (continued)

Derecognition of financial assets

The Bank derecognises a financial asset when its contractual cash flows expire, or the rights to receive those cash flows are transferred in an outright sale in which substantially all risks and rewards of ownership have been transferred. In addition, a financial asset is derecognised even if rights to receive cash flows are retained but at the same time the Bank assumes an obligation to pay the received cash flows without a material delay (pass through agreement) or when substantially all the risks and rewards are neither transferred nor retained but the Bank has transferred control of the asset. Control is transferred if, and only if, the transferee has the practical ability to sell the asset in its entirety to unrelated third party and is able to exercise that ability unilaterally and without imposing additional restrictions on the transfer.

The main transactions that are subject to the above de-recognition rules are repurchase agreements and stock lending transactions, where the assets transferred are not derecognised since the terms of the transaction entail the retention of all their risks and rewards.

On derecognition of a financial asset, the difference between the carrying amount of the asset and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognised in OCI for financial assets at FVOCI, is recognised in the income statement, except for cumulative gains or losses of FVOCI equity instruments which are not reclassified from OCI to income statement at the date of derecognition.

Modification of financial assets that may result in derecognition

In addition, derecognition of financial asset arises when its contractual cash flows are modified and the modification is considered substantial enough so that the original asset is derecognised and a new one is recognised. The Bank records the modified asset as a "new" financial asset at fair value and the difference with the carrying amount of the existing one is recorded in the income statement as derecognition gain or loss.

The Bank may modify the contractual terms of a financial asset either as a concession granted to a client facing or that is about to face financial difficulties or due to other commercial reasons such as changes in market conditions, competition or customer retention.

Modifications that may result in derecognition include:

- change in borrower;
- change in the currency that the lending exposure is denominated;
- debt consolidation features where two or more consumer unsecured lending contracts are consolidated into a single new secured lending agreement;
- the removal or addition of conversion features and/or profit sharing mechanisms and similar terms which are relevant to the SPPI assessment;
- any other changes that cause the terms under the modified contract to differ substantially from those under the old contract (e.g. a new term due to which the loan cannot be considered a basic lending arrangement).

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.12 Financial assets (continued)

Derecognition of financial assets (continued)

Modification of financial assets that may result in derecognition (continued)

Other modifications that do not affect significantly the risk profile of a financial asset and accordingly may not result in derecognition include:

- changes in interest rate that are not considered significant or grace periods;
- changes in collaterals that are not substantial;
- other changes in contractual terms, e.g. increase in maturity, capitalisation of accruals, etc.

In cases where the modification of the contractual cash flows is not considered substantial (following the derecognition assessment performed using the derecognition triggers provided above), the modification does not result in derecognition. The Bank recalculates the gross carrying amount of the financial asset and recognises the difference as a modification gain or loss, which is reflected in the income statement. When a modification includes debt forgiveness, the portion of the asset subject to forgiveness is derecognised first and then the calculation of the modification gain/loss is performed.

Any cumulative gain/loss recognised in OCI in respect of equity investment securities designated as FVOCI is not recognised in the income statement on derecognition of such securities. Any interest in transferred financial assets that qualify for derecognition that is created or retained by the Bank is recognised as a separate asset or liability.

The Bank enters into transactions whereby it transfers assets recognised on its balance sheet, but retains either all or substantially all of the risks and rewards of the transferred assets or a portion of them. In such cases, the transferred assets are not derecognised. Examples of such transactions are securities lending and sale-and-repurchase transactions.

In transactions in which the Bank neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

In certain transactions, the Bank retains the obligation to service the transferred financial asset for a fee. The transferred asset is derecognised if it meets the derecognition criteria. An asset or liability is recognised for the servicing contract if the servicing fee is more than adequate (asset) or is less than adequate (liability) for performing the servicing.

The Bank has established a structured framework for both the SPPI and derecognition assessment of its financial assets that takes place to ensure appropriate classification and measurement.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.13 Reclassification of financial assets

The Bank reclassifies a financial asset only when it changes its business model for managing financial assets. Generally, a change in the business model is expected to be rare and occurs when the Bank either begins or ceases to perform an activity that is significant to its operations; for example, when a business line is acquired, disposed of or terminated. In the rare event when there is a change to the existing business models, the updated assessment is approved by the Bank's competent Committees and the amendment is reflected appropriately in the Bank's budget and business plan.

Changes in intention related to particular financial assets (even in circumstances of significant changes in market conditions), the temporary disappearance of a particular market for financial assets or a transfer of financial assets between parts of the Bank with different business models, are not considered by the Bank changes in business model.

The reclassification is applied prospectively from the reclassification date, therefore previously recognised gains, losses (including impairment losses) or interest are not restated.

2.2.14 Financial liabilities

Classification and measurement

The Bank classifies its financial liabilities in the following categories: financial liabilities measured at amortised cost and financial liabilities measured at fair value through profit or loss.

Financial liabilities at fair value through profit or loss comprise of two sub categories: financial liabilities held for trading and financial liabilities designated at fair value through profit or loss upon initial recognition.

Financial liabilities held for trading, which include short positions of debt securities (sold but not yet purchased), are liabilities that the Bank incurs principally for the purpose of repurchasing in the near term for short term profit.

The Bank may, at initial recognition, irrevocably designate financial liabilities at FVTPL when one of the following criteria is met:

- the designation eliminates or significantly reduces an accounting mismatch which would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases; or
- a group of financial liabilities or financial assets and financial liabilities is managed and its performance is evaluated on a fair value basis in accordance with a documented risk management or investment strategy; or
- the financial liability contains one or more embedded derivatives as components of a hybrid contract which significantly modify the cash flows that otherwise would be required by the contract.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.14 Financial liabilities (continued)

Classification and measurement (continued)

Financial liabilities held for trading or designated at FVTPL are initially recognised at fair value. Changes in fair value are recognised in the income statement, except for changes in fair value attributable to changes in the Bank's own credit risk, which are recognised in OCI and are not subsequently reclassified to the income statement upon derecognition of the liabilities. However, if such treatment creates or enlarges an accounting mismatch in the income statement, all gains or losses of this financial liability, including the effects of changes in the credit risk, are recognised in the income statement.

Derecognition of financial liabilities

A financial liability is derecognised when the obligation under the liability is discharged, cancelled or expires. When an existing financial liability of the Bank is replaced by another from the same counterparty on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as an extinguishment of the original liability and the recognition of a new liability and any difference arising is recognised in the income statement.

The Bank considers the terms to be substantially different, if the discounted present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective interest rate, is at least 10% different from the discounted present value of the remaining cash flows of the original financial liability.

If an exchange of debt instruments or modification of terms is accounted for as an extinguishment, any costs or fees incurred are recognised as part of the gain or loss on the extinguishment. If the exchange or modification is not accounted for as an extinguishment, any costs or fees incurred adjust the carrying amount of the liability and are amortised over the remaining term of the modified liability.

2.2.15 Fair value measurement of financial instruments

Fair value of financial instruments is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date under current market conditions in the principal or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

When available, the Bank measures the fair value of an instrument using the quoted price in an active market for that instrument. A market is regarded as active if transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis. If there is no quoted price in an active market, then the Bank uses other valuation techniques that maximise the use of relevant observable inputs and minimise the use of unobservable inputs. The chosen valuation technique incorporates all of the factors that market participants would take into account in pricing a transaction.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.15 Fair value measurement of financial instruments (continued)

The Bank has elected to use mid-market pricing as a practical expedient for fair value measurements within a bid-ask spread.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e. the fair value of the consideration given or received unless the Bank determines that the fair value at initial recognition differs from the transaction price. In this case, if the fair value is evidenced by a quoted price in an active market for an identical asset or liability (i.e. Level 1 input) or based on a valuation technique that uses only data from observable markets, a day one gain or loss is recognised in the income statement. On the other hand, if the fair value is evidenced by a valuation technique that uses unobservable inputs, the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price (day one gain or loss). Subsequently the deferred gain or loss is amortised on an appropriate basis over the life of the instrument or released earlier if a quoted price in an active market or observable market data become available or the financial instrument is closed out.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy based on the lowest level input that is significant to the fair value measurement as a whole.

For assets and liabilities that are measured at fair value on a recurring basis, the Bank recognises transfers into and out of the fair value hierarchy levels at the beginning of the quarter in which a financial instrument's transfer was effected.

2.2.16 Impairment of financial assets

Impairment of financial assets

The Bank recognises allowance for expected credit losses that reflect changes in credit quality since initial recognition to financial assets that are measured at AC and FVOCI, including loans, lease receivables, debt securities, financial guarantee contracts and loan commitments. No ECL are recognised on equity investments.

ECL are a probability-weighted average estimate of credit losses that reflects the time value of money. Upon initial recognition of the financial instruments in scope of the impairment policy, the Bank records a loss allowance equal to 12-month ECL, being the ECL that result from default events that are possible within the next twelve months. Subsequently, for those financial instruments that have experienced a significant increase in credit risk ("SICR") since initial recognition, a loss allowance equal to lifetime ECL is recognised, arising from default events that are possible over the expected life of the instrument. If upon initial recognition, the financial asset meets the definition of POCI, the loss allowance is based on the change in the ECL over the life of the asset.

Loss allowances for trade receivables are always measured at an amount equal to lifetime ECL. For all other financial assets subject to impairment, the general three-stage approach applies.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.16 Impairment of financial assets (continued)

Impairment of financial assets (continued)

Accordingly, ECL are recognised using a three-stage approach based on the extent of credit deterioration since origination:

- Stage 1 When there is no significant increase in credit risk since initial recognition of a financial instrument, an amount equal to 12-month ECL is recorded. The 12-month ECL represent a portion of lifetime losses, that result from default events that are possible within the next 12 months after the reporting date and is equal to the expected cash shortfalls over the life of the instrument or group of instruments, due to loss events probable within the next 12 months. Not credit-impaired financial assets that are either newly originated or purchased, as well as, assets recognised following a substantial modification accounted for as a derecognition, are classified initially in Stage 1.
- Stage 2 When a financial instrument experiences a SICR subsequent to origination but is not
 considered to be in default, it is included in Stage 2. Lifetime ECL represent the expected credit
 losses that result from all possible default events over the expected life of the financial instrument.
- Stage 3 Financial instruments that are considered to be in default are included in this stage. Similar to Stage 2, the allowance for credit losses captures the lifetime expected credit losses.
- POCI POCI assets are financial assets that are credit-impaired on initial recognition. They are not subject to stage allocation and are always measured on the basis of lifetime expected credit losses. Accordingly, ECL are only recognised to the extent that there is a subsequent change in the assets' lifetime expected credit losses. Any subsequent favourable change to their expected cash flows is recognised as impairment gain in the income statement even if the resulting expected cash flows exceed the estimated cash flows at initial recognition. Apart from purchased assets, POCI assets may also include financial instruments that are considered new assets, following a substantial modification accounted for as a derecognition (refer to note 2.2.12).

Definition of default

To determine the risk of default, the Bank applies a default definition for accounting purposes, which is consistent with the European Banking Authority ("EBA") definition for non-performing exposure and regulatory definition of default as applied by the Bank on 1 January 2021 (refer to note 4.2.1.3). The accounting definition of default is also consistent with the one used for internal credit risk management purposes.

A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that exposure have occurred:

- The borrower faces a significant difficulty in meeting his financial obligations.
- There has been a breach of contract, such as a default or unpaid amounts, above specified materiality thresholds, for more than 90 consecutive days.
- The Bank, for economic or contractual reasons relating to the borrower's financial difficulty, has granted to the borrower a concession(s) that the Bank would not otherwise consider.
- There is a probability that the borrower will enter bankruptcy or other financial re-organisation.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.16 Impairment of financial assets (continued)

Definition of default (continued)

 For POCI assets, a purchase or origination at a deep discount that reflects incurred credit losses is considered a detrimental event. The Bank assesses the deep discount criterion following a principle-based approach with the aim to incorporate all reasonable and supportable information which reflects market conditions that exist at the time of the assessment.

For debt securities, the Bank determines the risk of default using an internal credit rating scale. The Bank considers debt securities as credit-impaired if the internal rating of the issuer/counterparty corresponds to a rating equivalent to "C" (Moody's rating scale) or the external rating of the issuer/counterparty at the reporting date is equivalent to "C" (Moody's rating scale) and the internal rating is not available.

Significant increase in credit risk ("SICR") and staging allocation

Determining whether a loss allowance should be based on 12-month expected credit losses or lifetime expected credit losses depends on whether there has been a SICR of the financial assets, issued loan commitments and financial guarantee contracts, since initial recognition.

At each reporting date, the Bank performs an assessment as to whether the risk of a default occurring over the remaining expected lifetime of the exposure has increased significantly from the expected risk of a default estimated at origination for that point in time.

The assessment for SICR is performed using both qualitative and quantitative criteria based on reasonable and supportable information that is available without undue cost or effort including forward looking information and macroeconomic scenarios as well as historical experience. Furthermore, regardless of the outcome of the SICR assessment based on the above indicators, the credit risk of a financial asset is deemed to have increased significantly when contractual payments are more than 30 days past due.

As a primary criterion for SICR assessment, the Bank compares the credit rating at origination with the credit rating at each reporting date. If the original credit rating is exceeded by a predetermined number of notches (note 3.1) then it is considered a case of SICR. Further to this indicator the Bank applies additional indicators such an absolute threshold on 12-month PD, an absolute threshold on internal credit rating, the granting or not of forbearance and finally a backstop rule of 30 days past due.

For a financial asset's risk, a threshold may be applied, normally reflected through the asset's forecasted PD, below which it is considered that no significant increase in credit risk compared to the asset's expected PD at origination date has taken place. In such a case the asset is classified at Stage 1 irrespectively of whether other criteria would trigger its classification at Stage 2. This criterion primarily applies to debt securities.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.16 Impairment of financial assets (continued)

Significant increase in credit risk ("SICR") and staging allocation (continued)

Internal credit risk rating (on a borrower basis) is also used as a basis for the identification of SICR with regards to lending exposures of the loan portfolio. Specifically, the Bank takes into consideration the changes of internal ratings by a certain number of notches. In addition, a watchlist status is also considered by the Bank as a trigger for SICR identification. Internal credit risk rating models include borrower specific information as well as, forward-looking information regarding the prospects of the industry in which it operates.

The assessment of SICR for debt securities is performed on an individual basis based on the number of notches downgrade in the internal credit rating scale since the origination date.

Forbearance measures as monitored by the Bank are considered as a SICR indicator and thus the exposures are allocated into Stage 2 upon forbearance, unless they are considered credit-impaired or the net present value of their cash flows before and after the restructuring exceed the threshold of 1%, in which case they are classified as Stage 3. Furthermore, regardless of the outcome of the SICR assessment based on the above indicators, the credit risk of a financial asset is deemed to have increased significantly when contractual payments are more than 30 days past due.

Furthermore, Management may apply temporary collective adjustments when determining whether credit risk has increased significantly since initial recognition on exposures that share the same credit risk characteristics to reflect macro-economic or other factors which are not adequately addressed by the current credit risk models. These factors may depend on information such as the type of the exposure, counterparty's specific information and the characteristics of the financial instrument while their application requires the application of significant judgment.

Transfers from Stage 2 to Stage 1

A financial asset, which is classified to Stage 2 due to SICR, is reclassified to Stage 1, as long as it does not meet anymore any of the Stage 2 Criteria.

Where forbearance measures have been applied, the Bank uses a probation period of two years, in order to fulfill the requirements for a transfer back to Stage 1. If at the end of that period the borrowers have made regular payments of a significant aggregate amount, there are no past due amounts over 30 days and the loans are neither credit-impaired, nor any other SICR criteria are met, they exit forborne status and are classified as Stage 1.

Transfers from Stage 3 to Stage 2

A financial asset is transferred from Stage 3 to Stage 2, when the criteria based on which the financial asset was characterised as credit-impaired, are no longer valid and/or the applicable probation period for the assets' return in non impaired status, ranging from three to twelve months, has passed.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.16 Impairment of financial assets (continued)

Criteria for grouping of exposures based on shared credit risk characteristics

The assessment of loss allowance is performed either on an individual basis or on a collective basis for groups of similar items with homogeneous credit risk characteristics. The Bank applies the same principles for assessing SICR since initial recognition when estimating ECLs on a collective or on an individual basis.

The Bank segments its lending exposures on the basis of shared credit risk characteristics for the purposes of both assessing significant increase in credit risk and measuring loan loss allowance on a collective basis. The different segments aim to capture differences in PDs and in the rates of recovery in the event of default.

The shared credit risk characteristics used for the segmentation of exposures include several elements such as: portfolio type, asset class, industry, credit risk rating, forbearance status and days in arrears.

Exposures allocated in Stage 3 are individually assessed and ECL measurement is performed on borrower specific information. This measurement is performed at a borrower level, hence the criteria are defined at this level, while both qualitative and quantitative factors are taken into consideration including forward looking information.

For exposures allocated in Stage 1 and Stage 2, ECL are measured on a collective basis, grouped into segments with shared risk characteristics such as portfolio type, business sector, and credit rating. This incorporates borrower specific information, collective historical experience of losses and forward-looking information. For debt securities, the measurement of impairment losses is performed on an individual basis.

Measurement of Expected Credit Losses

The measurement of ECL is an unbiased probability-weighted average estimate of credit losses that reflects the time value of money, determined by evaluating a range of possible outcomes. A credit loss is the difference between the cash flows that are due to the Bank in accordance with the contractual terms of the instrument and the cash flows that the Bank expects to receive (i.e. cash shortfalls) discounted at the original EIR of the same instrument, or the credit-adjusted EIR in case of POCI. In measuring ECL, information about past events, current conditions and reasonable and supportable forecasts of future conditions are considered. For loan commitments (i.e. undrawn commitments) ECL are calculated as the present value of the difference between the contractual cash flows due if the commitment was drawn and the expected cash flows to be received, while for financial guarantees ECL are measured based on a relevant credit conversion factor (CCF) applied on the outstanding balance.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.16 Impairment of financial assets (continued)

Measurement of Expected Credit Losses (continued)

The Bank estimates expected cash shortfalls, which reflect the cash flows expected from all possible sources, including collateral, guarantees and other credit enhancements that are part of the contractual terms and are not recognised separately. In case of a collateralised financial instrument, the estimated expected cash flows related to the collateral reflect the amount and timing of cash flows that are expected from liquidation less the discounted costs of obtaining and selling the collateral, irrespective of whether liquidation is probable.

ECL are calculated over the maximum contractual period over which the Bank is exposed to credit risk, which is determined based on the substantive terms of the instrument, or in case of revolving credit facilities, by taking into consideration factors such as the Bank's expected credit risk management actions to mitigate credit risk and past practice.

Receivables from customers arising from the Bank's activities other than lending, are presented under Other Assets and are typically short term. Therefore, considering that usually there is no significant financing component, the loss allowance for such financial assets is measured at an amount equal to the lifetime expected credit losses under the simplified approach.

ECL Key Inputs

The ECL calculations are based on the term structures of the probability of default ("PD"), the loss given default ("LGD"), the exposure at default ("EAD") and other input parameters such as the credit conversion factor (CCF). Generally, the Bank derives these parameters from internally developed statistical models and observed point-in-time and historical data, leveraging the existing infrastructure development for the regulatory framework and risk management practices.

The PD, LGD and EAD used for accounting purposes may differ from those used for regulatory purposes. For the purposes of impairment measurement, PD is a point-in-time estimate whereas for regulatory purposes PD is a "through-the-cycle" estimate. In addition, LGD and EAD for regulatory purposes are based on loss severity experienced during economic downturn conditions, while for impairment purposes, LGD and EAD reflect unbiased and probability-weighted estimates.

The PD represents the likelihood of default assessed on the prevailing economic conditions at the reporting date, adjusted to take into account estimates of future economic conditions that are likely to impact the risk of default, over a given time horizon.

The Bank uses Point in Time ("PiT") PDs in order to remove any bias towards historical data thus aiming to reflect management's view of the future as at the reporting date, incorporating relevant forward looking information including macroeconomic scenarios.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.16 Impairment of financial assets (continued)

ECL Key Inputs (continued)

Two types of PD are used for calculating ECL:

- 12-month PD, which is the estimated probability of default occurring within the next 12 months (or over the remaining life of the financial asset if this is less than 12 months). It is used to calculate 12-month ECL for Stage 1 exposures.
- Lifetime PD, which is the estimated probability of a default occurring over the remaining life of the financial asset. It is used to calculate lifetime ECLs for Stage 2, Stage 3 and POCI exposures.

For debt securities, PDs are obtained by an international rating agency using risk methodologies that maximise the use of objective non-judgmental variables and market data. The Bank assigns internal credit ratings to each issuer/counterparty based on these PDs. In case of counterparties for which no information is available, the Bank assigns PDs which are derived from internal models.

The exposure at default ("EAD") is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest and expected drawdowns on committed facilities. The EAD includes both on and off balance sheet exposures. The on balance sheet exposure corresponds to the total amount that has been withdrawn and is due to be paid, which includes the outstanding principal, accrued interest and any past due amounts. The off balance sheet exposure represents the credit that is available to be withdrawn, in excess of the on balance sheet exposure.

Furthermore, the CCF factor is used to convert the amount of a credit facility and other off-balance sheet amounts to an EAD amount. It is a modelled assumption which represents a proportion of any undrawn exposure that is expected to be drawn prior to a default event occurring.

LGD represents the Bank's expectation of the extent of loss on a defaulted exposure and it is the difference between the contractual cash flows due and those that the Bank expects to receive including any amounts from collateral liquidation. LGD varies by type of collateral or other credit support, and is usually expressed as a percentage of EAD. The Bank distinguishes its loan portfolios into two broad categories i.e. secured and unsecured. The Bank estimates the LGD component using cure rates that reflect cash recoveries, estimated proceeds from collateral liquidation, estimates for timing realisation, realisation costs, etc. Where the LGD's component values are dependent on macro – economic data, such types of dependencies are reflected by incorporating forward looking information, such as forecasted price indices into the respective models. The estimation of the aforementioned component values within LGD reflects available historical data which cover a reasonable period, i.e. a full economic cycle.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.16 Impairment of financial assets (continued)

ECL Key Inputs (continued)

For debt securities, the LGD is typically based on historical data derived mainly from rating agencies' studies but may also be determined considering the existing and expected liabilities structure of the obligor and macroeconomic environment.

Furthermore, the seniority of the debt security, any potential collaterals by the obligor or any other type of coverage is taken into account for the calculation.

Forward-looking information

The measurement of expected credit losses for each stage and the assessment of significant increases in credit risk consider information about reasonable and supportable forecasts of future events and macroeconomic conditions. The estimation and application of forward-looking information requires significant judgment.

The Bank uses, at a minimum, three macroeconomic scenarios (i.e. base, adverse and optimistic) to achieve the objective of measuring ECL in a way that reflects an unbiased and probability weighted outcome. The base scenario represents the most likely scenario and is aligned with the information used by the Bank for strategic planning and budgeting purposes.

The scenarios are reflected in the risk parameters, and, namely 12-month PD, Lifetime PD and LGD, hence 3 sets of each of these parameters are used, in line with the scenarios developed.

The Bank then proceeds to the calculation of weights for each scenario, which represent the probability of occurrence for each of these scenarios. These weights are applied on the 3 sets of calculations of the parameters in order to produce a single scenario weighted risk parameter value which is subsequently used in ECL measurement. ECL calculation incorporates forward-looking GDP growth rates and house price indices.

Modified financial assets

In cases where the contractual cash flows of a financial asset have been modified and the modification is considered substantial enough (for the triggers of derecognition, refer to derecognition of financial assets in note 2.2.12 above), the modification date is considered to be the date of initial recognition for impairment calculation purposes, including for the purposes of determining whether a significant increase in credit risk has occurred. Such a modified asset is typically classified as Stage 1 for ECL measurement purposes. However, in some circumstances following a modification that results in derecognition of the original financial asset, there may be evidence that the new financial asset is credit-impaired at initial recognition, and thus, the financial asset is recognised as an originated credit-impaired financial asset (POCI).

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.16 Impairment of financial assets (continued)

Modified financial assets (continued)

In cases where the contractual cash flows of a financial asset have been modified and the modification is not considered substantial enough, the Bank recalculates the gross carrying amount of the financial asset and recognises the difference as a modification gain or loss in the income statement and determines if the financial asset's credit risk has increased significantly since initial recognition by comparing the risk of a default occurring at initial recognition based on the original unmodified contractual terms and the risk of a default occurring at the reporting date, based on the modified contractual terms.

Presentation of allowance for expected credit losses

For financial assets measured at amortised cost, impairment allowance is recognised as a loss allowance reducing the gross carrying amount of the financial assets in the balance sheet. For debt instruments measured at FVOCI, impairment allowance is recognised in other comprehensive income and does not reduce the carrying amount of the debt instruments in the balance sheet. For off-balance sheet financial items arising from lending activities, impairment allowance is presented in "Other Liabilities", while the respective ECL is recognised within impairment losses.

Write-off of financial assets

Where the Bank has no reasonable expectations of recovering a financial asset either in its entirety or in a portion of it, the gross carrying amount of that instrument is reduced directly, partially or in full, against the impairment allowance. The amount that is written-off is considered as derecognised. Subsequent recoveries of amounts previously written off decrease the amount of the impairment losses in the income statement.

Financial assets that are written off could still be subject to enforcement activities in order to comply with the Bank's procedures for recovery of amounts due.

During 2021, the Bank updated the write off policy with the introduction of a new approval procedure and enhanced controls. The policy defines in detail the circumstances under which a facility may be written off, in order for the Bank to accurately estimate the recoverable amount and also maximise recoveries through the use of appropriate tools such as forbearance and debt forgiveness. The enhanced control environment which requires additional approvals (Credit Committee members plus additional member) is in place so as to safeguard that the process is correctly applied to cases of borrowers that are eligible for write off.

The Risk Management Unit and the Debt Recovery Unit are closely monitoring cases of non-performing borrowers and jointly recommend the write off amount based on the recovery analysis performed for such borrowers.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)
- 2.2.17 Sale and repurchase agreements, securities lending and borrowing
- (i) Sale and repurchase agreements

Securities sold subject to repurchase agreements ("repos") continue to be recorded in the Bank's balance sheet as the Bank retains substantially all risks and rewards of ownership, while the counterparty liability is included in amounts due to other banks or due to customers, as appropriate. Securities purchased under agreements to resell ("reverse repos") are recorded as loans and advances to other banks or customers, as appropriate. The difference between the sale and repurchase price in case of repos and the purchase and resale price in case of reverse repos is recognised as interest and accrued over the period of the repo or reverse repo agreements using the effective interest method.

(ii) Securities lending and borrowing

Securities lent to counterparties against the receipt of a fee continue to be recognised in the financial statements. Securities borrowed are recognised as trading liabilities when sold to third parties and measured at fair value with any gains or losses included in the income statement.

2.2.18 Leases

The Bank enters into leases as a lessee.

At inception of a contract, the Bank assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

When the Bank becomes the lessee in a lease arrangement, it recognises a lease liability and a corresponding right-of-use (RoU) asset at the commencement of the lease term when the Bank acquires control of the physical use of the asset.

Lease liabilities are presented within "Other liabilities" and RoU assets within "Property and equipment". Lease liabilities are measured based on the present value of the future lease payments over the lease term, discounted using an incremental borrowing rate. The interest expense on lease liabilities is presented within net interest income.

The lease liability is remeasured when there is a change in future lease payments arising from a change in an index or rate, a change in the Bank's estimate of the amount expected to be payable under a residual value guarantee or if the Bank changes its assessment of whether it will exercise a purchase, extension or termination option. When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the RoU asset, or is recorded in profit or loss if the carrying amount of the RoU asset has been reduced to zero.

Notes to the financial statements

2 Basis of preparation and significant accounting policies (continued)

2.2 Principal accounting policies (continued)

2.2.18 Leases (continued)

The RoU asset is initially recorded at an amount equal to the lease liability and is adjusted for rent prepayments, initial direct costs, or lease incentives received. Subsequently, the RoU asset is depreciated over the shorter of the lease term or the useful life of the underlying asset, with the depreciation presented within operating expenses.

When a lease contains extension or termination options that the Bank considers reasonably certain to be exercised, the expected future lease payments or costs of early termination are included within the lease payments used to calculate the lease liability.

2.2.19 Employee benefits

(i) Defined contribution plans

The Bank provides defined contribution pension plans where annual contributions are invested and allocated to specific asset categories. Obligations for contributions to defined contribution plans are expensed as the related service is provided and recognised as "staff costs" in the income statement. Prepaid contributions are recognised as an asset to the extent that a cash refund or a reduction in future payments is available.

(ii) Short-term employee benefits

Short-term employee benefits are those expected to be settled wholly before twelve months after the end of the annual reporting period in which the employees render the related services and are expensed as the related service is provided. A liability is recognised for the amount expected to be paid if the Bank has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee and the obligation can be estimated reliably.

2.2.20 Related party transactions

Related parties of the Bank include:

- a) an entity that has control over the Bank and entities controlled, jointly controlled or significantly influenced by this entity, as well as members of its key management personnel and their close family members;
- b) an entity that has significant influence over the Bank and entities controlled by this entity;
- c) members of key management personnel of the Bank, their close family members and entities controlled or jointly controlled by the abovementioned persons;
- d) associates and joint ventures of the Bank and the Group;
- e) fellow subsidiaries,
- f) post-employment benefit plans established for the benefit of the Bank's employees.

Transactions of similar nature are disclosed on an aggregate basis. All banking transactions entered into with related parties are in the normal course of business and are conducted on an arm's length basis.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.21 Provisions

Provisions are recognised when the Bank has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and reliable estimates of the amount of the obligation can be made.

The amount recognised as a provision is the best estimate of the expenditure required to settle the present obligation at each reporting date, taking into account the risks and uncertainties surrounding the amount of such expenditure.

Provisions are reviewed at each reporting date and adjusted to reflect the current best estimate. If, subsequently, it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed.

2.2.22 Share capital

Ordinary shares are classified as equity.

Incremental costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from the proceeds.

Dividend distribution on shares is recognised as a deduction in the Bank's equity when approved by the General Meeting of shareholders and the required regulatory approvals, if any, are obtained. Interim dividends are recognised as a deduction in the Bank's equity when approved by the Board of Directors.

Share premium is the difference between the fair value of the consideration receivable for the issue of shares and the nominal value of the shares. Share premium account can only be resorted to for limited purposes, which do not include the distribution of dividends, and is otherwise subject to the provisions of the Cyprus Companies Law on reduction of share capital.

2.2.23 Financial guarantees and commitments to extend credit

Financial guarantees

Financial guarantee contracts are contracts that require the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payments when due, in accordance with the terms of a debt instrument. Such financial guarantees are granted to banks, financial institutions and other bodies on behalf of customers to secure loans, overdrafts and other banking facilities.

Financial guarantees are initially recognised at fair value, being the premium received. Subsequent to initial recognition, such guarantees are measured at the higher of the amount of the ECL allowance, and the amount initially recognised less any cumulative amortisation of the fee earned, where appropriate.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.23 Financial guarantees and commitments to extend credit (continued)

Commitments to extend credit

Commitments represent off-balance sheet items where the Bank commits, over the duration of the agreement, to provide a loan with pre-specified terms to the customer. Such contractual commitments represent commitments to extend credit and standby letters and they are part of the normal lending activities of the Bank, for which an ECL allowance is recognised under IFRS 9.

ECL allowance for off-balance sheet exposures (financial guarantees granted and loan commitments) is included within "Other Liabilities".

2.2.24 Cash and cash equivalents

Cash and cash equivalents are items which are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value. Cash and cash equivalents include cash in hand, unrestricted deposits with central banks, all interbank placements and reverse sale agreements with other banks with original maturities of three months or less. Funds restricted for a period of more than three months on origination are excluded from cash and cash equivalents.

Cash and cash equivalents are carried at amortised cost.

2.2.25 Government grants

Government grants are transfers of resources to the Bank by a government entity such as government, government agencies and similar bodies whether local, national or international, in return for compliance with certain past of future conditions related to the Bank's operating activities.

Government grants are recognised when there is reasonable assurance that the grant will be received and the Bank will comply with the conditions attached to it. The grants are recognised in the income statement on a systematic basis to match the way that the Bank recognises the expenses for which the grants are intended to compensate. In case of subsequent changes in the Bank's expectations of meeting the conditions attached to the government grants, the effect of such changes is recognised in the income statement.

2.2.26 Investments in subsidiaries

Subsidiaries are all entities (including structured entities) over which the Bank has control. The Bank controls an entity when the Bank is exposed to, or has rights to, variable returns from its involvement with the entity and has the ability to affect those returns through its power over the entity.

Notes to the financial statements

- 2 Basis of preparation and significant accounting policies (continued)
- 2.2 Principal accounting policies (continued)

2.2.26 Investments in subsidiaries (continued)

Investments in subsidiaries are measured at cost less impairment. Investments in subsidiaries are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognised in the income statement for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. An impairment loss recognised in prior years is reversed where appropriate if there has been a change in the estimates used to determine the recoverable amount.

2.2.27 Other payables

Other payables are recognised initially at fair value and subsequently measured at amortised cost using the effective interest rate method.

2.2.28 Fiduciary activities

The Bank provides custody, trustee and agency services to third parties that result in the holding or investing of assets on behalf of its clients. This involves the Bank making allocation, purchase and sale decisions in relation to a wide range of financial instruments. The Bank receives fee income for providing these services. Those assets that are held in a fiduciary capacity are not assets of the Bank and are not recognised in the financial statements. In addition, the Bank does not guarantee these investments and as a result it is not exposed to any credit risk in relation to them.

3 Critical accounting estimates and judgments in applying accounting policies

3.1 Impairment losses on loans and advances to customers

In 2022, the geopolitical and economic upheaval caused by the Russian invasion in Ukraine, along with the persistent - albeit decelerating - inflationary pressures, high energy prices and rising borrowing costs affected negatively the global economic environment, worsened the macroeconomic outlook of the European economies, which are now confronted with a slowdown in growth and, accordingly, exacerbated economic uncertainty in the regions that the Bank operates. In this volatile environment, the Cyprus economy has exhibited notable resilience, mainly driven by the increase in consumption, export of services, strong performance in tourism and further acceleration of new investments supported by the RRF funds, whereas it is expected to continue, at a slower pace though, its growth dynamics (note 2).

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

On the back of the overall economic uncertainty mentioned above, the Bank continued its robust performance, as evidenced by the level of its credit quality indicators at year end 2022 that outperformed the expected levels in terms of NPE ratio, whereas it remains cautious towards the risks that may eventually affect vulnerable corporate borrowers (like those that operate in the food industry, the energy sector, the supply of raw materials for the construction sector etc.) and erode the disposable income and the repayment capacity of private individuals. In this context, in the fourth quarter of 2022, the Bank revised the key macroeconomic variables incorporated in the IFRS 9 expected credit losses' models, in order to reflect, to the extent possible, the recent developments in the local economy.

ECL measurement

The ECL measurement requires Management to apply significant judgement, in particular, the estimation of the amount and timing of future cash flows and collateral values when determining impairment losses and the assessment of a significant increase in credit risk. These estimates are driven by a number of factors, changes in which can result in significant changes to the timing and amount of allowance for credit loss to be recognised.

The Bank's ECL calculations are outputs of complex models with a number of underlying assumptions regarding the choice of variable inputs and their interdependencies. In addition, temporary adjustments may be required to capture new developments and information available, which are not reflected yet in the ECL calculation through the risk models.

The elements of the ECL models that are considered significant accounting judgments and estimates include:

Determination of a significant increase in credit risk

IFRS 9 does not include a definition of what constitutes a significant increase in credit risk ("SICR"). An assessment of whether credit risk has increased significantly since initial recognition is performed at each reporting period by considering primarily the change in the risk of default occurring over the remaining life of the financial instrument. The Bank assesses whether a SICR has occurred since initial recognition based on qualitative and quantitative reasonable and supportable forward-looking information that includes significant management judgment (note 2.2.16).

For lending exposures, the origination PD curves and the residual lifetime PD curves at each reporting date are mapped to credit rating bands. Accordingly, SICR thresholds are based on the comparison of the origination and reporting date credit ratings, whereby rating downgrades represent changes in residual lifetime PD. The Bank segments the exposures based on asset class, loan type and credit rating at origination.

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

Determination of a significant increase in credit risk (continued)

As of 31 December 2022 and 2021, the credit rating deterioration thresholds as per applicable borrower internal rating scale, that trigger allocation to Stage 2 per rating bands for the Bank's portfolio are set out in the table below:

Internal rating bands	SICR threshold range	
1-2	Three notches or more	
3-5	Two notches or more	
6	One notch or more	
≥7	SICR	

Determination of scenarios, scenario weights and macroeconomic factors

To achieve the objective of measuring ECL, the Bank evaluates a range of possible outcomes in line with the requirements of IFRS 9 through the application of a minimum three macroeconomic scenarios i.e. baseline, adverse and optimistic, in a way that reflects an unbiased and probability weighted outcome. Each of the scenarios is based on Management's assumptions around future economic conditions in the form of macroeconomic, market and other factors. Changes in these assumptions and in other external factors could significantly impact ECL. As at 31 December 2022 and 2021, the probability weights for the above mentioned scenarios applied by the Bank in the ECL measurement calculations are 50% for the baseline scenario and 25% for the adverse and optimistic scenarios.

The key assumptions underlying in each macroeconomic scenario are provided below:

• Base scenario:

After a 5,2% GDP growth contraction in 2020, the economy grew by 5,5% in 2021, returning to its prepandemic levels of economic activity. Employment and economic momentum were expected to remain solid for 2022, assisted by investments through the RRF and demand for tourism. However, the invasion of Ukraine by Russia has materially clouded the growth outlook. The negative spill over from the war is expected to be primarily transmitted through the tourism channel given the traditionally high share (almost 20%) of Russians in tourist flows to the island. Exports will also be negatively affected by the commercial, mainly financial, services that diachronically the island provides to Russia and which account for almost 20% of the services Cyprus provides outside the EU. Additionally, energy and commodity prices along with supply chain disruptions continue to inflate the cost of living and erode the purchasing power of consumers, albeit they will start to decline visibly from 2023 onwards. Considering the above, GDP growth will slow sharply in 2022 before recovering in the medium term. The recovery should kick in in 2023 and it is projected to continue in the medium term, supported by investments and structural reforms under the RRF auspices. Gross Fixed Capital Formation (GFCF) contracted by 6,3% YoY in 2021 due to the decline in construction investment in the category of dwellings. Low base effects from 2021 and the gradual unfolding of RRF funds will stimulate both private and public investments, which are anticipated to remain firm throughout the forecasting period.

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

Determination of scenarios, scenario weights and macroeconomic factors (continued)

• Optimistic scenario:

A quicker de-escalation on the war front is assumed that will decompress energy and commodity prices. Inflationary pressures will ease quicker than in the baseline scenario resulting in milder trim in the disposable income and the private consumption respectively. Through the above-described channel, GDP growth could stand at higher levels than those under the baseline.

• Adverse scenario:

In the anticipation of a more protracted and prolonged conflict, energy and commodity costs could continue to rise while the imposition of additional sanctions by Western countries on Russia could dampen further the fragile economic confidence. In that case, the hit on the economy would be harder in 2022 and inflation could escalate further, placing the rebound in the following years at a lower trajectory.

Forward-looking information

The Bank ensures that impairment estimates and macroeconomic forecasts, as provided by Economic Analysis & Financial Markets Research Division, applicable for business and regulatory purposes are fully consistent.

The arithmetic averages of the scenarios' probability-weighted annual forecasts used in the ECL measurement for the year ended 31 December 2022 and 31 December 2021, are set in the following table:

Key macroeconomic indicator	31 December 2022 Average (2023-2025) annual forecast	31 December 2021 Average (2022-2025) annual forecast
Gross Domestic Product growth	2,23%	3,36%
Gross capital formation	5,20%	5,02%

The above is information collected from official sources such as the Ministry of Finance, the Central Bank of Cyprus and the European Community, incorporating also the Bank's management views on the future evolution of economic activity.

Changes in the scenarios and weights, the corresponding set of macroeconomic variables and the assumptions made around those variables for the forecast horizon would have a significant effect on the ECL amount. The Bank independently validates all models and underlying methodologies used in the ECL measurement through competent resources, who are independent of the model development process.

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

Assessment of LGD

The Bank's assumptions on the expected recovery period, the collateral realisation haircut and costs to the Bank on the repossession and subsequent sale of the collaterals were developed as a factor to estimate LGD.

As at 31 December 2022, the weighted average collateral realisation haircut used in the Stages 1 and 2 ECL calculation approximates to 28,0% (2021: 28,50%) while the respective weighted average recovery period for property collaterals approximates to 7 years (2020: 5 years).

For exposures in Stage 3, to achieve the objective of measuring ECL, the Bank calculates individually assessed loss allowances based on the weighted average of three scenarios, i.e. baseline, adverse and optimistic with the same probability weights as in the case of Stage 1 and 2 exposures.

The weighted probability scenarios are focused on the specific facts and circumstances of each borrower with key inputs/ assumptions being the operational cash flows (where this is appropriate), the expected recovery period, the collateral realisation haircut and costs to the Bank on the repossession and subsequent sale of the collaterals.

Any changes in these assumptions or a variance between assumptions made and actual results could result in significant changes in the amount of required credit losses on loans and balances due to customers.

As at 31 December 2022, the weighted average collateral realisation haircut used in Stage 3 ECL calculation approximates to 27,46% (2021: 27,66%), while the respective weighted average recovery period for property collaterals approximates to 7,76 years (2021: 7,15 years).

Development of ECL models, including the various formulas, choice of assumptions, inputs and interdependencies

For the purposes of ECL measurement the Bank performs the necessary model parameterisation based on observed point-in-time data on a granularity of monthly intervals. The ECL calculations are based on input parameters, i.e. EADs, PDs, LGDs, etc., incorporating management's view of the future. The Bank also determines the links between macroeconomic scenarios and, economic inputs, such as GDP and the effect on PDs. For EADs the carrying amount of the facility is used as at reference date; for off balance sheet exposures appropriate CCFs are applied. The CCF and expected lifetime of revolving facilities has been estimated based on past statistical data.

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

Development of ECL models, including the various formulas, choice of assumptions, inputs and interdependencies (continued)

Furthermore, the PDs are unbiased rather than conservative and incorporate relevant forward looking information including macroeconomic scenarios. The forecasting risk parameters models incorporate a number of macroeconomic variables, such as GDP, and portfolio specific variables such as seasonal flag etc., which are used as independent variables for optimum predictive capability. In 2022, the Bank proceeded with the recalibration of its PD models, by introducing industry specific macro variables in corporate borrowers and applying interest rate and inflation scalars in the estimation of retail customers' debt to income ratio. More specifically, in the latter case, the borrowers' instalments were estimated with the use of the projected interest rates, while the income model, also took into account the projected inflation on top of the projected GDP and unemployment ratio.

The ECL models are based on logistic regressions and run under the different macroeconomic scenarios and relevant changes and shocks in the macro environment reflected accordingly in a non-linear manner.

Segmentation of financial assets when their ECL is assessed on a collective basis

The Bank segments its exposures on the basis of shared credit risk characteristics upon initial recognition for the purposes of both assessing significant increase in credit risk and measuring loan loss allowance on a collective basis. The different segments aim to capture differences in PDs and in the rates of recovery in the event of default. On subsequent periods, the Bank re-evaluates the grouping of its exposures at least on an annual basis, in order to ensure that the groups remain homogeneous in terms of their response to the identified shared credit risk characteristics. Resegmentation reflects management's perception in respect to the change of credit risk associated with the particular exposures compared to initial recognition. For the shipping portfolio, in respect of which the Bank has limited historical data, the PDs were derived using Group's information to supplement the internally available data.

Modeling and Management overlays / adjustments

A number of sophisticated models have been developed or modified to calculate ECL, while temporary management adjustments may be required to capture new developments and information available, which are not yet reflected in the ECL calculation through the risk models. Internal counterparty rating changes, new or revised models and data may significantly affect ECL. The models have been validated by a related group entity who is independent of the model development process and are approved by the Board Risk Committee ("BRC").

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

Sensitivity analysis on lending portfolios

The sensitivity analysis when performed on certain key parameters can provide meaningful information only for portfolios where the risk parameters have a significant impact on the overall credit risk of a lending portfolio, particularly where such sensitivities are also used for internal credit risk management purposes. Otherwise, a sensitivity analysis on certain combinations of some risk parameters may not produce meaningful results, as in reality there are interdependencies between the various economic inputs, rendering any changes in the parameters, changes correlated in other factors.

Based on the above favourable and adverse scenario weighting variation, a re-estimation of key indicators linked to these variations, namely recovery periods, haircuts and PDs, was performed.

The tables below present the estimated effect in the Bank's ECL measurement (including off-balance sheet items) per stage, due to combined changes of forecasts in key indicators:

Increase/(decrease) on ECL for loans and advances to customers at amortised cost classified in 12 month ECL (Stage 1) and lifetime ECL not credit-impaired (Stage 2)

	2022	2021
	€′000	€′000
Macroeconomic projections as per the adverse IFRS9 scenario	2.010	1.085
Macroeconomic projections as per the optimistic IFRS9 scenario	(1.148)	(741)
Full base scenario: 100% base IFRS9 scenario	(419)	(149)
Increase the expected recovery period by 1 year	214	237
Decrease the expected recovery period by 1 year	(47)	(231)
Increase the collateral realisation haircut by 5%	781	955
Decrease the collateral realisation haircut by 5%	(639)	(846)
Increase in the PDs by 20%	2.969	2.646
Decrease in the PDs by 20%	(3.018)	(2.686)

Increase/(decrease) on ECL for loans and advances to customers at amortised cost classified in lifetime ECL credit-impaired (Stage 3)

	2022	2021
	€′000	€′000
Macroeconomic projections as per the adverse IFRS9 scenario	2.458	1.700
Macroeconomic projections as per the optimistic IFRS9 scenario	(1.635)	(1.480)
Full base scenario: 100% base IFRS9 scenario	(199)	(110)
Increase the expected recovery period by 1 year	1.388	1.020
Decrease the expected recovery period by 1 year	(610)	(1.047)
Increase the collateral realisation haircut by 5%	2.364	2.118
Decrease the collateral realisation haircut by 5%	(1.978)	(2.064)

In the first three scenarios of the above list, the ECL was estimated with the application of 100% weight on each one of the base, adverse and optimistic IFRS 9 scenarios.

Notes to the financial statements

- 3 Critical accounting estimates and judgments in applying accounting policies (continued)
- 3.1 Impairment losses on loans and advances to customers (continued)

Sensitivity analysis on lending portfolios (continued)

The Bank updates and reviews the reasonability and performs back-testing of the applicable recovery periods and haircuts for ECL measurement, at least on an annual basis or earlier, based on facts and circumstances. In this context, experienced and dedicated staff within the Bank's Risk Management function monitors the risk parameters applied for the estimation of ECL. Furthermore, as part of the well-defined governance framework, any revisions to the methodology used are approved by the Bank competent committees and ultimately the BRC.

3.2 Fair value of financial instruments

The fair value of financial instruments is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants in the principal (or most advantageous) market at the measurement date under current market conditions (i.e. an exit price) regardless of whether that price is directly observable or estimated using another valuation technique.

The fair value of financial instruments that are not quoted in an active market are determined by using other valuation techniques that include the use of valuation models. In addition, for financial instruments that trade infrequently and have little price transparency, fair value is less objective and requires varying degrees of judgment depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument. In these cases, the fair values are estimated from observable data in respect of similar financial instruments or using other valuation techniques.

The valuation models used include present value methods and other models based mainly on observable inputs and to a lesser extent to non-observable inputs, in order to maintain the reliability of the fair value measurement.

Where valuation techniques are used to determine the fair values of financial instruments that are not quoted in an active market, they are validated and periodically reviewed by qualified personnel independent of the personnel that created them. All models are certified before they are used, and are calibrated to ensure that outputs reflect actual data and comparative market prices. Fair values estimates obtained from models are adjusted for any other factors, such as liquidity risk or model uncertainties, to the extent that market participants would take them into account in pricing the financial instrument. The main assumptions and estimates, considered by management when applying a valuation model include:

- the likelihood and expected timing of future cash flows;
- the selection of the appropriate discount rate, which is based on an assessment of what a market participant would regard as an appropriate spread of the rate over the risk-free rate; and
- judgment to determine what model to use in order to calculate fair value.

To the extent practicable, models use only observable data, however areas such as credit risk (both own and counterparty), volatilities and correlations require the Management to make estimates to reflect uncertainties in fair values resulting from the lack of market data inputs.

Notes to the financial statements

3 Critical accounting estimates and judgments in applying accounting policies (continued)

3.2 Fair value of financial instruments (continued)

Inputs into valuations based on unobservable data are inherently uncertain because there is little or no current market data available. However, in most cases there will be some historical data on which to base a fair value measurement and consequently even when unobservable inputs are used, fair values will use some market observable inputs.

Information in respect of the fair valuation of the Bank's financial assets and liabilities is provided in note 4.5.

3.3 Classification of financial instruments

The Bank applies significant judgment in assessing the classification of its financial instruments and especially, in the below areas:

Business model assessment

Judgment is exercised in order to determine the appropriate level at which to assess the business model. In assessing the business model of financial instruments, these are aggregated into groups (business lines) based on their characteristics, and the way they are managed in order to achieve the Bank's business objectives. In general, the assessment is performed at the business unit level for lending exposures and based on the measurement category for debt securities. However, further disaggregation may be performed by business strategy/ region, etc.

In assessing the business model for financial instruments, the Bank performs a past sales evaluation of the financial instruments and assesses their expected evolution in the future. Judgment is exercised in determining the effect of sales to a "hold to collect" business model depending on their objective and their acceptable level and frequency.

Contractual cash flow characteristics test (SPPI test)

The Bank performs the SPPI assessment of lending exposures and debt securities by considering all the features which might potentially lead to SPPI failure. Judgment is applied by the responsible business units when considering whether certain contractual features significantly affect future cash flows. Accordingly, for non-recourse financial assets, the Bank assesses jointly criteria such as the adequacy of equity, LTV (Loan-to-Value) and DSCR (Debt-Service-Coverage-Ratio) ratios as well as the existence of corporate and personal guarantees. Furthermore, in order to assess whether any variability in the cash flows is introduced by the modified time value of money element, the Bank performs a quantitative assessment (as described in note 2.2.12). Moreover, the Bank evaluates certain cases on whether the existence of performance-related terms exposes the Bank to asset risk rather to the borrower's credit risk.

The Bank has established a robust framework to perform the necessary assessments in accordance with Bank policies in order to ensure appropriate classification of financial instruments, including reviews by experienced staff.

Notes to the financial statements

3 Critical accounting estimates and judgments in applying accounting policies (continued)

3.4 Provisions and contingent liabilities

The Bank recognises provisions when it has a present legal or constructive obligation, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of its amount.

A provision is not recognised and a contingent liability is disclosed when it is not probable that an outflow of resources will be required to settle the obligation, when the amount of the obligation cannot be measured reliably or in case that the obligation is considered possible and is subject to the occurrence or non-occurrence of one or more uncertain future events.

Considering the subjectivity and uncertainty inherent in the determination of the probability and amount of the abovementioned outflows, the Bank takes into account a number of factors such as legal advice, the stage of the matter and historical evidence from similar cases.

Further information in relation to the Bank's provisions and contingent liabilities is provided in note 29.

3.5 Leases

The Bank, as a lessee, determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it is reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised.

The Bank applies judgement in evaluating whether it is reasonably certain or not to exercise an option to renew or terminate the lease, by considering all relevant factors and economic aspects that create an economic incentive. The Bank reassesses the lease term if there is a significant event or change in circumstances that is within its control that affects its ability to exercise or not to exercise the option to renew or to terminate, such as significant leasehold improvements or significant customisation of the leased asset.

In measuring lease liabilities, the Bank uses the lessees' incremental borrowing rate ('IBR') when it cannot readily determine the interest rate implicit in the lease. The IBR is the rate of interest that the Bank would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment.

Therefore, estimation is required when no observable rates are available or when they need to be adjusted to reflect the terms and conditions of the lease. The Bank estimates the IBR using observable inputs (such as government bond yields) as a starting point when available, and performs certain additional entity-specific adjustments, such as credit spread adjustments or adjustments to reflect the lease terms and conditions.

Notes to the financial statements

4 Financial risk management and fair value

4.1 Use of financial instruments

By their nature the Bank's activities are principally related to the use of financial instruments including derivatives. The Bank accepts deposits from customers, at both fixed and floating rates, and for various periods and seeks to earn above average interest margins by investing these funds in high quality assets. The Bank seeks to increase these margins by consolidating short-term funds and lending for longer periods at higher rates, while maintaining sufficient liquidity to meet all claims that might fall due.

The Bank also seeks to raise its interest margins by obtaining above average margins, net of provisions, through lending to commercial and retail borrowers within a range of credit standing. Such exposures include both on-balance sheet loans and advances and off-balance sheet guarantees and other commitments such as letters of credit.

The Bank also invests in financial instruments where it takes positions in traded on organised markets and over the counter instruments including derivatives, to hedge interest rate risks and to utilise excess liquidity at higher interest rates.

4.2 Financial risk factors

The Bank's activities expose it to a variety of financial risks, such as credit risk, market risk (including currency risk, interest rate risk and equity price risk), liquidity risk and operational risk. The Bank's overall risk management strategy seeks to minimise any potential adverse effects on its financial performance, financial position and cash flows.

Risk Management objectives and policies

The Bank acknowledges that taking risks is an integral part of its operations in order to achieve its business objectives. Therefore, the Bank's management sets adequate mechanisms to identify those risks at an early stage and assesses their potential impact on the achievement of these objectives.

Due to the fact that economic, industry, regulatory and operating conditions will continue to change, risk management mechanisms are set in a manner that enable the Bank to identify and deal with the risks associated with those changes. The Bank's structure, internal processes and existing control mechanisms ensure both the independence principle and the exercise of sufficient supervision.

The Bank's Management considers effective risk management as a top priority, as well as a major competitive advantage, for the organisation. As such, the Bank has allocated significant resources for upgrading its policies, methods and infrastructure, in order to ensure compliance with the requirements of the European Central Bank, the guidelines of the European Banking Authority and the Basel Committee for Banking Supervision and the best international banking practices. The Bank implements a well-structured credit approval process, independent credit reviews and effective risk management policies for credit, market, liquidity and operational risk. The risk management policies implemented by the Bank are reviewed annually.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

Risk Management objectives and policies (continued)

The maximum amount of risk which the Bank is willing to assume in the pursuit of its strategic objectives is articulated via a set of quantitative and qualitative statements for specific risk types, including specific tolerance levels as described in the Bank's Risk Appetite Framework. The objectives are to support the Bank's business growth, balance a strong capital position with higher returns on equity and to ensure the Bank's adherence to regulatory requirements.

Risk appetite that is clearly communicated throughout the Bank, determines risk culture and forms the basis on which risk policies and risk limits are established.

The Bank aims to adopt best practices regarding corporate governance, taking into account all relevant guidelines and regulatory requirements. The Bank has developed a well-established risk governance structure, based on clear ownership and accountability principles, efficient segregation of duties, prevention of conflicts of interest and strong independent oversight at all levels.

As a response to Covid-19, the Bank reviewed and revised its IFRS 9 framework by conducting a bottom-up exercise to identify SICR. At the same time the Bank reviewed its lending strategy and undertook initiatives to support its customers facing temporary liquidity needs due to the pandemic. Also it classified sectors according to the degree they were affected by Covid-19 so as to monitor and manage its exposures effectively as well as identify opportunities for further credit expansion.

Board Risk Committee

The Board of Directors has delegated to the Board Risk Committee ("BRC") the duties and responsibilities to approve all strategic risk management decisions (e.g. risk appetite, capital allocation, balance sheet profile and risk management structure). As such BRC plays a key role in the oversight of the risk management function of the Bank. The BRC, through its effective oversight, guides the Bank into strengthening further the risk control environment and assists fundamentally the Board of Directors into taking proper and sound strategic decisions.

Risk Management Unit

The purpose of the Risk Management Unit ("RMU") is to establish and implement an appropriate system for the measurement and management of all significant risks inherent in the activities of the Bank. Among others, the functions of the RMU include the following:

- The utilisation of suitable methods employed for the identification and management of risks;
- The fine-tuning of limits based on specific parameters, by type of risk, counter-party, business sector, country, currency, facility, security, derivative, etc.;
- The setting-up of an early warning system for individual and connected portfolios;
- The carrying out of stress tests for all types of risks, on annual basis;
- Submission of various reports, at least on a quarterly basis to the Board of Directors and the executive management;
- · Implementation of provisioning policy;
- Set up of risk policies & procedures.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

Risk Management objectives and policies (continued)

Risk Management Unit (continued)

The RMU is headed by the Risk Executive who is appointed by the Board of Directors and is organised along the following departments:

- Credit Risk: (i) reviews all credit proposals and prepares risk assessments (ii) maintains records of all approved borrowers' limits & credit exposures.
- Market, Liquidity & Counterparty Risk: (i) monitors market risks to which the Bank is exposed
 to, (ii) monitors and reports counterparty exposures (iii) develops models and systems for the
 measurement of market risks (iv) monitors the liquidity of the Bank.
- Operational Risk: assists the business units in (i) identifying, assessing, capturing, reporting, monitoring, preventing and mitigating all Operational Risk events of their ownership (ii) implementing an effective operational risk management program, providing reliable information on the most significant risks, measuring and monitoring the operational risk exposure undertaken by the Bank thus adding value through increased efficiency in risk management, efficient capital allocation, acknowledgement and accountability of risks.
- Credit Control: monitors and evaluates on an ongoing basis the quality of the credit portfolio, allocates provision charges per specific borrower or portfolios of borrowers and verifies adherence to the Bank's Credit Policy Manual. Furthermore, it is responsible for the regulatory and management reporting for all credit related matters.

4.2.1 Credit risk

Credit risk is the risk that a counterparty will be unable to pay amounts in full when due. Credit risk arises from Bank's activities and from the offered products and services. Taking into account that credit risk is the primary risk the Bank is exposed to, it is very closely managed and monitored according to the Bank's risk management framework.

Country risk is the risk of losses arising from economic difficulties or political unrest in a country, including the risk of losses following nationalisation, expropriation and debt restructuring.

Foreign exchange lending risk refers to the risk of loss due to exchange rate movements which in the case of loans denominated in a foreign currency, can strongly influence a borrower's debt-servicing capacity, thus impacting credit risk.

Settlement risk is the risk arising when payments are settled, for example for trades in financial instruments, including derivatives and currency transactions. The risk arises when the Bank remits payments before it can ascertain that the counterparties' payments have been received.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

Credit concentration risk is defined as the current or prospective risk to earnings and capital arising from excessive exposure placed with one counterparty or group of related counterparties whose likelihood of default is driven by common underlying factors e.g. geographical location, economic sector and industry.

The Bank's lending policy is monitored on an ongoing basis depending on the overall lending strategy (affected by opportunities and threats detected in the local and international business environment), the introduction of new products and services or other criteria as decided by the Bank's Management. Internal procedures and policies are revised accordingly so as to reflect the needs created by the new environment.

In the context of SICR assessment during the Covid-19 pandemic outbreak, the Bank took into consideration the disruptive effect of overly pro-cyclical assumptions inherent in the IFRS9 models that aggravate the ECL results, as well as the fact that the entire lending portfolios are not equally affected by the pandemic, as described in note 3.1.

Credit approval process

The credit approval process is centralised through establishment of Credit Committees with escalating Credit Approval Levels. Credit Committees are authorised to approve new financing, renewals or amendments in the existing credit limits, in accordance with their approval authority level, depending on total limit amount and customer risk category as well as the value and type of collateral and the monitoring of the loan during its lifecycle.

Credit risk monitoring

The Risk Management Unit monitors and assesses on an ongoing basis the quality of the Bank's loan portfolio and operates independently from the business units of the Bank.

The Bank has in place a system for monitoring the delinquency of credit facilities and setting-up of adequate provisions for loan impairment in accordance to IFRS and local regulations. The monitoring system includes:

- monitoring of the borrower's financial condition, business evolution and overall creditworthiness;
- monitoring the compliance of the borrowers to the set financial and other covenants; and
- monitoring delinquencies (past dues).

Rating systems

The Bank applies various credit rating systems for the assessment and measurement of credit risk. These systems assign a specific rating to every borrower/counterparty which reflects the creditworthiness of the particular borrower and consequently the ability to repay funds on a timely manner. Credit rating takes under consideration various quantitative and qualitative factors.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

Rating systems (continued)

The Bank periodically reviews rating systems and adapts them to particular market conditions, products or borrowers.

The Bank employs the following rating models for its portfolio:

- Moody's Risk Analyst model ("MRA") is used to assess the risk of borrowers for Corporate and Commercial Lending.
- Internal Credit Rating model ("ICR") is used for those customers that cannot be rated by MRA.
- Slotting rating models for specialised exposures.

The rating systems consist an integral part of the banking decision-making and risk management processes:

- The credit approval or rejection, both at the origination and review process;
- The allocation of competence levels for credit approval;
- Risk-adjusted pricing;
- Internal capital allocation; and
- The impairment calculation (staging criteria and subsequent ECL estimation of forecasted risk parameters).

Credit risk mitigation

A key component of the Bank's business strategy is to reduce risk by utilising various risk mitigating techniques. The most important risk mitigating means are collaterals' pledges, guarantees and netting agreements. The types of collaterals commonly accepted by the Bank are:

- Residential real estate, commercial real estate, industrial buildings and land;
- Receivables (trade debtors);
- Securities, including listed shares and bonds;
- Deposits;
- Guarantees and letters of support;
- Insurance policies;
- Equipment, mainly vessels.

A specific coverage ratio is pre-requisite, upon the credit relationship's approval and on ongoing basis, for each collateral type.

For exposures, other than loans to customers (i.e. reverse repos, derivatives), the Bank accepts as collateral only cash or liquid bonds.

Valuation principles of collaterals

In defining the maximum collateral ratio for loans, the Bank considers all relevant information available, including the collaterals' specific characteristics, if market participants would take those into account when pricing the relevant assets.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

Valuation principles of collaterals (continued)

The valuation and hence eligibility is based on the following factors:

- the collateral's fair value, i.e. the exit price that would be received to sell the asset in an orderly transaction under current market conditions;
- the fair value reflects market participants' ability to generate economic benefits by using the
 asset in its highest and best use or by selling it;
- a reduction in the collateral's value is considered if the type, location or condition (such as deterioration and obsolescence) of the asset indicate so; and
- no collateral value is assigned if a pledge is not legally enforceable.

The Bank performs collaterals' valuation in accordance with its processes and policies. For real estate collaterals, the Bank employs external qualified appraisers based on predefined criteria (qualifications and expertise) and also utilises appropriate indices such as the index published by the Central Bank of Cyprus. All appraisals take into account factors such as the region, age and marketability of the property.

Collateral policy and documentation

Regarding collaterals, Bank's policy emphasises the need that collaterals and relevant processes are timely and prudently executed, in order to ensure that collaterals and relevant documentation are legally enforceable at any time. The Bank holds the right to liquidate collateral in the event of the obligor's financial distress and can claim and control cash proceeds from the liquidation process.

Counterparty risk

The Bank mitigates counterparty risk arising from treasury activities by entering into master netting arrangements and similar agreements, as well as collateral agreements with counterparties with which it undertakes a significant volume of transactions. Master netting arrangements do not generally result in the offset of balance sheet assets and liabilities, as the transactions are usually settled on a gross basis. However, the respective credit risk is reduced through a master netting agreement to the extent that if an event of default occurs, all amounts with the counterparty are terminated and settled on a net basis.

In the case of derivatives, the Bank makes use of International Swaps and Derivatives Association ("ISDA") contracts, which limit the exposure via the application of netting, and Credit Support Annex ("CSAs"), which further reduce the total exposure with the counterparty. Under these agreements, the total exposure with the counterparty is calculated on a daily basis taking into account any netting arrangements and collaterals.

The same process is applied in the case of repo transactions where standard Global Master Repurchase Agreements ("GMRAs") are used. The exposure (the net difference between repo cash and the market value of the securities) is calculated on a daily basis and collateral is transferred between the counterparties thus minimising the exposure.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

Forbearance practices on lending activities

Modifications of the loans' contractual terms may arise due to various factors, such as changes in market conditions, customer retention and other factors as well as due to the potential deterioration in the borrowers' financial condition.

Forbearance practices as monitored and reported by the Bank, based on the European Banking Authority Implementing Technical Standards ("EBA ITS"), occur only in the cases where the contractual payment terms of a loan have been modified, as the borrower is considered unable to comply with the existing loan's terms due to apparent financial difficulties and the Bank grants a concession by providing more favorable terms and conditions that it would not otherwise consider had the borrower not been in financial difficulties.

All other types of modifications granted by the Bank, where there is no apparent financial difficulty of the borrower and may be driven by factors of a business nature are not classified as forbearance measures.

Classification of Forborne loans

Forborne loans are classified either as non-impaired (Stage 2), or as impaired (Stage 3) by assessing their delinquency and credit quality status.

Credit impaired forborne loans enter initially a probation period of one year where the borrowers' payment performance is closely monitored. If at the end of the abovementioned period, the borrowers have complied with the terms of the program and there are no past due amounts and concerns regarding the loans' full repayment, the loans are then reported as non-impaired forborne loans (Stage 2). In addition, non-impaired forborne loans, including those that were previously classified as credit impaired and complied with the terms of the program, are monitored over a period of two years. If, at the end of that period, the borrowers have made regular payments of a significant aggregate amount, there are no past due amounts over 30 days and the loans are neither credit impaired nor any other SICR criteria are met they exit forborne status and are classified as Stage 1. Particularly, the category of credit impaired forborne loans includes those that (a) at the date when forbearance measures were granted, were more than 90 days past due or assessed as unlikely to pay, (b) at the end of the one year probation period met the criteria of entering the non-impaired status and during the two years monitoring period new forbearance measures were extended or became more than 30 days past due, and (c) were initially classified as non-impaired and during the two years monitoring period met the criteria for entering the credit impaired status.

Impairment assessment

Where forbearance measures are extended, the Bank performs an assessment of the borrower's financial condition and its ability to repay, under the Bank's impairment policy as described in note 2.2.16.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

4.2.1.1 Maximum exposure to credit risk before collateral held

The tables below represent the maximum credit risk exposure of the Bank at 31 December 2022 and 2021, without taking into account any collateral held or other credit enhancements that do not qualify for offset in the Bank's financial statements.

For on-balance sheet assets, the exposures set out below are based on the carrying amounts as reported in the balance sheet. For off-balance sheet items, exposures are shown at nominal amount.

Credit risk exposures relating to on-balance sheet assets:	202 €′00		202 €′00	_
Cash and balances with central banks Less: impairment allowance	3.266.706	3.266.706	2.843.764 (13)	2.843.751
Due from credit institutions at AC	1.526.922		1.626.824	
Less: impairment allowance	(2)	1.526.920	(26)	1.626.798
Derivative financial instruments		23.938		18.539
Loans and advances to customers at AC: Retail lending: - Mortgage	14.060		12.548	
- Consumer	20.625		20.363	
- Affluent banking	86.008		54.450	
- Credit cards	895		784	
Wholesale lending:				
- Large corporate	1.549.219		1.505.497	
- Wealth management	404.684		383.263	
- International business banking	471.844		466.386	
- Shipping	228.213	2 720 040	203.923	2 500 550
Less: impairment allowance	(45.630)	2.729.918	(46.664)	2.600.550
Investment securities at FVOCI		494.490		555.729
Investment securities at AC	828.578		459.385	
Less: impairment allowance	(344)	828.234	(171)	459.214
Investment securities mandatorily at FVTPL		1.959		1.995
Other assets	<u>-</u>	652	_	405
Total	1	8.872.817	_	8.106.981
Credit risk exposures relating to off-balance sheet items (note 29):				
Financial guarantee contracts and other credit related				
commitments		206.974		166.781
Loan commitments		445.897		540.445
Less: impairment allowance		(8.254)	_	(5.384)
Total		644.617	-	701.842

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

4.2.1.2 Due from credit institutions

The credit quality of placements and settlement balances with credit institutions and reverse repurchase agreements receivable from credit institutions held at amortised cost and at FVTPL, based on rating agencies' counterparty ratings, is analysed as follows as at 31 December 2022 and 2021:

	2022	2021
At amortised cost:	€′000	€′000
Aaa to Aa3	5.419	11.586
A1 to A3	24.442	47.577
Baa1 to Baa3	•	37.870
Ba1 to Ba3	1.496.526	1.529.186
Not rated	535_	605
Gross carrying amount	1.526.922	1.626.824
Less impairment allowance	(2)	(26)
Carrying amount	1.526.920	1.626.798
**·· 1··· 0 ···· ·		

Amounts due from credit institutions include reverse repurchase agreements of €1.490.836 thousand as at 31 December 2022 (2021: €1.515.435 thousand).

The majority of the reverse repurchase agreements receivables as at 31 December 2022, approximately €1.245.373 thousand (2021: €1.253.633 thousand), have underlying securities which are rated as investment grade.

The movement in impairment allowance of amounts due from credit institutions in 2022 and 2021 is as follows:

	2022	2021
	12-month	12-month
	ECL	ECL
	€′000	€'000
Balance at 1 January	26	45
New financial assets	-	15
Impact of ECL net remeasurement	(8)	(7)
Financial assets that have been derecognised	(15)	(28)
Foreign exchange	(1)_	1
Balance at 31 December	2	26

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers
- (a) Credit quality of loans and advances to customers

Loans and advances to customers carried at amortised cost are allocated in stages depending on how ECL is measured.

Accordingly, loans reported as non-impaired include loans for which a "12-month ECL allowance" is recognised as they exhibit no significant increase in credit risk since initial recognition and loans for which a "Lifetime ECL allowance" is recognised as they exhibit a significant increase in credit risk since initial recognition but are not considered to be in default.

Credit-impaired loans category includes loans that are considered to be in default, for which a loss allowance equal to "Lifetime ECL" is recognised.

Loans and advances to customers carried at FVTPL are not subject to ECL measurement and therefore are not included in the quantitative information provided in the below sections for loans and advances measured at amortised cost, except where indicated.

The Bank's accounting policy regarding impairment of financial assets is set out in note 2.2.16.

The following tables present the total gross carrying and nominal amount, representing the maximum exposure to credit risk before the impairment allowance, of loans and advances and credit related commitments respectively that are classified as not credit-impaired (Stage 1 and Stage 2) and those classified as credit-impaired (Stage 3), as well as the carrying amount of those loans and advances to customers carried at FVTPL. They also present the total impairment allowance recognised in respect of all loans and advances and credit related commitments, based on how the respective impairment allowance has been calculated, the carrying amount of loans and advances, as well as the value of collateral held to mitigate credit risk. In addition, the value of collateral presented in the tables below is capped to the respective gross carrying amount.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

31 December 2022

		_	Credit-						
•	Non-im	paired	impaired		lmp	airment allo	wance		
	12-month ECL	Lifetime ECL not credit- impaired	Lifetime ECL credit- impaired	Total gross carrying amount / nominal exposure	12- month ECL	Lifetime ECL not credit- impaired	Lifetime ECL credit- impaired	Carrying amount	Value of collateral
	€′000	€′000	€'000	€′000	€′000	€′000	€′000	€′000	€′000
Loans and advances to									
Retail lending:	customers at	attion tisea co	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,						
- Mortgage	13.881	82	97	14,060	1	-	-	14.059	
Value of collateral	13.340	82	97	2					13.519
- Consumer	20.582	1	42	20.625	200	_	42	20.383	
Value of collateral	1.310	-	-	20.022					1.310
- Affluent banking	84.983	995	30	86.008	142	12	12	85.842	
Value of collateral	79.769	847	18						80.634
- Credit card	823	25	47	895	6	1	41	847	
Value of collateral	58		6						64
Wholesale lending:	50		-						
- Large corporate	1.284.316	212.005	52.898	1.549.219	3.171	3.197	26.810	1.516.041	
Value of collateral	1.020.024	189.208	50.120						1.259.352
- Wealth	2.020.02	2007.000							
management	373.405	16.270	15.009	404,684	615	249	9.186	394.634	
Value of collateral	344.599	15.781	14.225						374.605
-International	5	20.7.02	_ //						
business banking	471.742	59	43	471,844	-	_	6	471.838	
Value of collateral	471.219	55	37						471.311
- Shipping	226.380	_	1.833	228.213	106		1.833	226.274	
Value of collateral	226.339		-						226.339
Total	2.476.112	229.437	69.999	2.775.548	4.241	3.459	37.930	2.729.918	2.427.134
Value of collateral	2.156.658	205.973	64.503	2.427.134					
Credit related commits Financial guarantee contracts and other credit related	ments:								
commitments	188.193	18.374	407	206.974	2.374	343	302		
Loan commitments	411.963	32.709	1.225	445.897	1.474	3.761	-		
	600.156	51.083	1.632	652.871	3.848	4.104	302		
Value of collateral	159.044	20.160	1.005	180.209					

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

31 December 2021

			Credit-						
	Non-im	paired	impaired		lmp	airment allo	wance		
				Total gross			·		
		Lifetime	Lifetime	carrying		Lifetime	Lifetime		
		ECL not	ECL	amount /	12-	ECL not	ECL		
	12-month	credit-	credit-	nominal	month	credit-	credit-	Carrying	Value of
	ECL	impaired	impaired	exposure	ECL	impaired	impaired	amount	collateral
	€'000	€'000	€′000	€′000	€′000	€′000	€′000	€'000	€′000
Loans and advances to	customers at a	mortised co	st:						
Retail lending:									
- Mortgage	12.358	93	97	12.548		-	-	12.548	
Value of collateral	12.089	93	<i>97</i>						12.279
- Consumer	20.303	43	17	20.363	126	-	17	20.220	
Value of collateral	932	40	-						972
 Affluent banking 	52.808	1.254	388	54.450	105	16	137	54.192	
Value of collateral	49.671	1.179	347						51.197
- Credit card	725	19	40	784	3	1	40	740	
Value of collateral	40	-	_						40
Wholesale lending:									
- Large corporate	1.267.626	197.303	40.568	1.505.497	3.941	3.631	24.400	1.473.525	
Value of collateral	1.033.187	181.485	34.961						1.249.633
- Wealth									
management	348.635	16.129	18.499	383.263	708	285	10.158	372.112	
Value of collateral	333.791	<i>15.575</i>	17.772						367.138
-International									
business banking	465.099	7	1.280	466.386	_	-	1.275	465,111	
Value of collateral	464.742	7	1.279						466.028
- Shipping	202.196	=	1.727	203.923	94	_	1,727	202.102	100,040
Value of collateral	202.148	-	-						202.148
Total	2.369.750	214.848	62.616	2.647.214	4.977	3.933	37.754	2.600.550	2.349.435
Value of collateral	2.096,600	198.379	54.456	2.349.435					
Credit related commit	manter								
Financial guarantee	nerres.								
contracts and other									
credit related									
commitments	152.277	14.148	356	166.781	1.114	390	283		
Loan commitments	508.096	31.573	776	540.445	1.307	2.290	*		
	660.373	45.721	1.132	707.226	2.421	2.680	283		
Value of collateral	176.101	13.531	345	189.977					
,			y-13	200.00					

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

The Bank assesses the credit quality of its loans and advances to customers and credit related commitments that are subject to ECL using internal credit rating systems for its portfolio which are based on a variety of quantitative and qualitative factors.

The following tables present the distribution of the gross carrying amount of loans and advances to customers carried at amortised cost and the nominal exposure of credit related commitments based on the credit quality classification categories and stage allocations used in 2022 and 2021:

	Non-ir	npaired	Credit-impaired	
	12-month ECL €'000	Lifetime ECL not credit-impaired €'000	Lifetime ECL credit-impaired €'000	Total gross carrying amount €'000
Retail lending:	6 000	2 000	7 300	
- Mortgage				
Strong	13.881	82	-	13.963
Impaired	-	-	97	97
- Consumer				
Strong	20.500	-	-	20.500
Satisfactory	82	1	*	83
Impaired	-	-	42	42
- Affluent banking				
Strong	62.379	210	*	62.589
Satisfactory	22.604	785	=	23.389
Impaired	-	-	30	30
- Credit card				
Strong	542	5	-	547
Satisfactory	281	20	<u>.</u>	301
Impaired	-	-	47	47
Wholesale lending:	*			
- Large corporate				
Strong	778.435	3.976	-	782.411
Satisfactory	505.881	184.795	-	690.676
Watch list	-	23.234		23.234
Impaired	•	-	52.898	52.898
- Wealth management				
Strong	342.951	1.245	No.	344.196
Satisfactory	30.454	13.865	-	44.319
Watch list	-	1,160	15.000	1.160 15.009
Impaired	-	•	15.009	15.005
 International business banking 				450 004
Strong	469.249	55	-	469.304 2.497
Satisfactory	2.493	4	43	2.497
Impaired	-	-	43	43
- Shipping				225 252
Strong	226.352	-	-	226.352
Satisfactory	28	-	1 022	28 1.833
Impaired	3 470 440	330 437	1.833 69.999	2.775.548
	2.476.112	229.437	69.999	2.773.348

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

	31 December 2021				
	Non-ir	mpaired	Credit-impaired		
	12-month ECL €′000	Lifetime ECL not credit-impaired €′000	Lifetime ECL credit-impaired €'000	Total gross carrying amount €'000	
Retail lending:	0 000	0 000	C 000	€ 000	
- Mortgage					
Strong	12.358	93	-	12.451	
Impaired	••	-	97	97	
- Consumer					
Strong	20.292	-	_	20.292	
Satisfactory	11	3	-	14	
Watch list	-	40	•	40	
lmpaired	-	-	17	17	
- Affluent banking					
Strong	37.322	264	_	37.586	
Satisfactory	15.486	990	-	16.476	
Impaired	•	-	388	388	
- Credit card					
Strong	433	9	-	442	
Satisfactory	292	9	**	301	
Watch list		1	-	1	
Impaired	~		40	40	
Wholesale lending:					
- Large corporate					
Strong	708.971	3.010	-	711.981	
Satisfactory	558.655	179.441	-	738.096	
Watch list	-	14.852		14.852	
Impaired	-	-	40.568	40.568	
- Wealth management					
Strong	329.715	1.899	-	331.614	
Satisfactory	18.920	13.048	-	31.968	
Watch list	•	1.182	•	1.182	
lmpaired	-	-	18.499	18.499	
- International business banking					
Strong	444.031	7	-	444.038	
Satisfactory	21.068	-	-	21.068	
Impaired	-	-	1.280	1.280	
- Shipping					
Strong	196.838	-	**	196.838	
Satisfactory	5.358	-	-	5.358	
Impaired	-	-	1.727	1.727	
	2.369.750	214.848	62.616	2.647.214	

As at 31 December 2022 and 2021, there were no loans and advances to customers measured at FVTPL.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

12-month ECL mont credit impaired Lifetime ECL mont credit impaired EC m		Non-imp		nber 2022 Credit-impaired	
Credit related commitments: Financial guarantee contracts and other credit related commitments: 147.609 Strong 137.588 10.021 - 147.609 Satisfactory 50.605 7.849 - 58.454 Watch list - 504 407 407 Loan commitments: 296.563 174 - 296.737 Satisfactory 115.400 31.641 - 894 Watch list - 894 - 894 Impaired - - 12.025 1225 1.225 Match list - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - 894 - - 894 - - 894 - - - -		12-month ECL	Lifetime ECL not credit- impaired	Lifetime ECL credit-impaired	exposure
Strong 137.588 10.021 - 147.609 Satisfactory 50.605 7.849 - 50.4 Watch list - 50.4 - 50.4 Impaired - - 407 407 Loan commitments: Strong 296.563 174 - 296.737 Satisfactory 115.400 31.641 - 147.041 Watch list - 894 - 894 Impaired - - - 1.225 1.225 100 - - - 1.225	Credit related commitments:	2 000			
Strong 137.588 10.021 - 147.609 Satisfactory 50.605 7.849 - 50.4 Watch list - 50.4 - 50.4 Impaired - - 407 407 Loan commitments: Strong 296.563 174 - 296.737 Satisfactory 115.400 31.641 - 147.041 Watch list - 894 - 894 Impaired - - - 1.225 1.225 100 - - - 1.225	Financial guarantee contracts and other	er credit related comi	mitments:		
Satisfactory 50.605 7.849 - 58.454 Watch list - 504 - 504 Impaired - - 407 407 Loan commitments: Strong 296.563 174 - 296.737 Satisfactory 115.400 31.641 - 147.041 Watch list - 894 - 894 Impaired - 1.225 1.225 1.225 Non-impaired Strong Strong Lifetime ECL Lifetime ECL Credit-impaired exposure €'000 €'000 €'000 €'000 €'000 Credit related commitments: Strong 90.902 1 - 90.913 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - 319.989 106 - 356 356		137.588	10.021	-	147.609
Watch list impaired - 504		50.605	7.849	-	
Impaired	•	-	504	-	
Strong 296.563 174 — 296.737 Satisfactory 115.400 31.641 — 147.041 Watch list — 894 — 894 Impaired — 1.225 1.225 600.156 51.083 1.632 652.871 Non-impaired Lifetime ECL not credit-impaired Credit-impaired credit-impaired credit-impaired credit related commitments: Lifetime ECL credit-impaired credit related commitments: Strong 90.902 11 — 90.913 Satisfactory 61.375 14.003 — 75.378 Watch list — 134 — 90.913 Impaired — 356 356 Loan commitments: Strong 319.989 106 — 320.095 Satisfactory 188.107 28.603 — 216.710 Watch list — 2.864 — 2.864 Impaired — 776 776		•	-	407	407
Satisfactory 115.400 31.641 - 147.041 Watch list - 894 - 894 Impaired - - 1.225 1.225 Mon-impaired S1.083 1.632 652.871 Non-impaired S1.083 1.632 652.871 Non-impaired S1.082 Lifetime ECL Credit-impaired EX.090 EX.09	Loan commitments:				
Satisfactory 115.400 894 - 894 Impaired - - 1.225 1.225 600.156 51.083 1.632 652.871 Non-impaired 51.0ecember 2021 Non-impaired Credit-impaired Lifetime ECL not credit-impaired Lifetime ECL oredit-impaired Credit-impaired exposure €'000 <th< td=""><td>Strong</td><td></td><td></td><td>-</td><td></td></th<>	Strong			-	
Match list Impaired	Satisfactory	115.400			
Financial guarantee contracts and other credit related commitments: Strong 90.902 11 0.90.913 0.90.913 Satisfactory 61.375 14.003 0.90.913 0.90.913 Impaired 1.90.90.90.90.90.90.90.90.90.90.90.90.90.	Watch list	=	894	-	== :
$ \begin{array}{c c c c c c c c c c c c c c c c c c c $	lmpaired				
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$					
12-month ECL $€'000$ impaired $€'000$ credit-impaired $€'000$ exposure $€'000$ Credit related commitments: Financial guarantee contracts and other credit related commitments: Strong 90.902 11 - 90.913 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - - 776 776		Non-imp			
€′000 €′000 €′000 €′000 Credit related commitments: Financial guarantee contracts and other credit related commitments: Strong 90.902 11 - 90.913 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - - 776 776		Non-imp	aired Lifetime ECL	Credit-impaired	Tatal naminal
Credit related commitments: Financial guarantee contracts and other credit related commitments: Strong 90.902 11 - 90.913 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - - 776 776			Lifetime ECL not credit-	Credit-impaired Lifetime ECL	
Financial guarantee contracts and other credit related commitments: Strong 90.902 11 - 90.913 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - - 776 776		12-month ECL	Lifetime ECL not credit- impaired	Credit-impaired Lifetime ECL credit-impaired	exposure
Strong 90.902 11 - 90.913 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - - 356 356 Loan commitments: - - 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - 776 776		12-month ECL	Lifetime ECL not credit- impaired	Credit-impaired Lifetime ECL credit-impaired	exposure
Strong 30.302 14.003 - 75.378 Satisfactory 61.375 14.003 - 75.378 Watch list - 134 - 134 Impaired - - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - 776 776		12-month ECL €′000	Lifetime ECL not credit- impaired €'000	Credit-impaired Lifetime ECL credit-impaired	exposure
Satisfactory 01.373 134 - 134 Impaired - - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - 776 776		12-month ECL €'000 ner credit related com	Lifetime ECL not credit- impaired €'000	Credit-impaired Lifetime ECL credit-impaired	exposure €'000
Watch list 154 Impaired - - 356 356 Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - 776 776	Financial guarantee contracts and oth Strong	12-month ECL €'000 ner credit related com 90.902	Lifetime ECL not creditimpaired €′000	Credit-impaired Lifetime ECL credit-impaired	exposure €′000 90.913
Loan commitments: Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired 776 776	Financial guarantee contracts and oth Strong Satisfactory	12-month ECL €'000 ner credit related com 90.902	Lifetime ECL not credit- impaired €'000 smitments: 11 14.003	Credit-impaired Lifetime ECL credit-impaired	exposure €'000 90.913 75.378
Strong 319.989 106 - 320.095 Satisfactory 188.107 28.603 - 216.710 Watch list - 2.864 - 2.864 Impaired - - 776 776	Financial guarantee contracts and oth Strong Satisfactory Watch list	12-month ECL €'000 ner credit related com 90.902	Lifetime ECL not credit- impaired €'000 smitments: 11 14.003	Lifetime ECL credit-impaired €'000	exposure €'000 90.913 75.378 134
Strong Satisfactory 188.107 Watch list Impaired Satisfactory 28.603 - 216.710 - 2.864 - 2.864 - 776 776	Financial guarantee contracts and oth Strong Satisfactory Watch list Impaired	12-month ECL €'000 ner credit related com 90.902	Lifetime ECL not credit- impaired €'000 smitments: 11 14.003	Lifetime ECL credit-impaired €'000	exposure €'000 90.913 75.378 134
Watch list - 2.864 - 2.864 Impaired - 776 776	Financial guarantee contracts and oth Strong Satisfactory Watch list Impaired	12-month ECL €'000 her credit related com 90.902 61.375 -	Lifetime ECL not creditimpaired €'000 smitments: 11 14.003 134	Lifetime ECL credit-impaired €'000	exposure €'000 90.913 75.378 134 356
Impaired 776 776	Financial guarantee contracts and oth Strong Satisfactory Watch list Impaired Loan commitments: Strong	12-month ECL €'000 her credit related com 90.902 61.375 - - - 319.989	Lifetime ECL not creditimpaired \$\epsilon' 000 \text{smitments:} 11 14.003 134	Lifetime ECL credit-impaired €'000	exposure €'000 90.913 75.378 134 356
Impaired	Financial guarantee contracts and oth Strong Satisfactory Watch list Impaired Loan commitments: Strong Satisfactory	12-month ECL €'000 her credit related com 90.902 61.375 - - - 319.989	Lifetime ECL not creditimpaired €'000 mitments: 11 14.003 134 106 28.603	Lifetime ECL credit-impaired €'000	exposure €'000 90.913 75.378 134 356 320.095 216.710
660.373 45.721 1.132 707.226	Financial guarantee contracts and oth Strong Satisfactory Watch list Impaired Loan commitments: Strong Satisfactory Watch list	12-month ECL €'000 her credit related com 90.902 61.375 - - - 319.989	Lifetime ECL not creditimpaired €'000 mitments: 11 14.003 134 106 28.603	Lifetime ECL credit-impaired €'000	exposure €'000 90.913 75.378 134 356 320.095 216.710 2.864

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

The table below depicts the internal credit rating bands that correspond to the credit quality classification categories presented in the above tables.

Credit quality classification categories	Bank SME Model	ICR Scorecard	PB Rating Methodology	Slotting Rating Model
Strong	1 – 3.9	1 - 4	1 - 4	Strong / Good
Satisfactory	4 – 7.5	5 - 6	5 - 6	Satisfactory
Watch list	7.6 - 9.9	7 – 9	7 – 9	Watchlist / Weak
Impaired	10	10	10	NPL / Default

The following table presents exposure-weighted probabilities of default (PD) for performing exposures, based on the credit quality classification categories used in 2022 and 2021. For stage 1 exposures 12-month PDs were used, whereas for stage 2 exposures Lifetime PDs were used.

	31 Decem	per 2022	31 December 2021		
Credit Quality Classification Category	Wholesale	Retail	Wholesale	Retail	
Strong	1,1%	1,5%	1,1%	1,0%	
Satisfactory	5,6%	2,5%	4,9%	2.0%	
Watchlist	13,9%	0,2%	21,1%	2,8%	

The following tables present the movement of the gross carrying amounts for loans and advances to customers carried at amortised cost by product line and stage in 2022 and 2021, respectively:

21	Daca	mhar	2022

	Who	olesale lendi	ng		Retail lending		
	12-month ECL €'000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	12-month ECL €′000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	Total €'000
Gross carrying amount at 1 January	2.283.556	213.439	62.074	86.194	1.409	542	2.647.214
New financial assets originated or purchased Transfers:	867.075	-	-	31.787	-	<u></u>	898.862
- To 12-month ECL	27.320	(27.152)	(168)	883	(524)	(359)	
 To lifetime ECL not credit-impaired 	(83.948)	86.055	(2.107)	(334)	334	(333)	-
 To lifetime ECL credit- impaired 	(2.580)	(17.520)	20.100	(44)	(9)	53	-
Financial assets derecognised	(2.832)	(1.574)	(2.994)	(1.059)	-	-	(8.459)
Amounts written off	-	-	(49)	• •	-	-	(49)
Repayments	(743.919)	(38.426)	(9.461)	(9.840)	(297)	(55)	(801.998)
Foreign exchange difference and other movements	11.171	13.512	2,388	12.682	190	. ,	
Gross carrying amount at	221272	13,312	2,300	12.002	190	35	39.978
31 December	2.355.843	228.334	69.783	120.269	1.103	216	2.775.548
Less impairment allowance	(3.892)	(3.446)	(37.835)	(349)	(13)	(95)	(45.630)
Carrying amount at 31 December	2.351.951	224.888	31.948	119.920	1.090	121	2.729.918

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

31 December 2021

	Who	olesale lendin	g	ı			
		Lifetime	Lifetime		Lifetime	Lifetime	
		ECL not	ECL		ECL not	ECL	
	12-month	credit-	credit-	12-month	credit-	credit-	
	ECL.	impaired	impaired	ECL	impaired	lmpaired	Total
	€′000	€'000	€′000	€′000	€'000	€,000	€'000
Gross carrying amount at 1 January	1.945.766	153.703	71.408	65.626	1.139	394	2.238.036
New financial assets originated							
or purchased	765.631	-	-	24.521	-	-	790.152
Transfers:							
- To 12-month ECL	12.808	(12.808)	-	97	(97)	-	-
- To lifetime ECL not credit-impaired	(86.529)	91.725	(5.196)	(729)	729	-	-
- To lifetime ECL credit- impaired	(98)	(3.433)	3.531	(155)	(6)	161	-
Financial assets derecognised	(31.886)	(1.295)	-	(626)	(234)	-	(34.041)
Amounts written off	-	-	(731)	-	-	(12)	(743)
Repayments	(340.204)	(21,455)	(8.249)	(7.465)	(174)	(26)	(377.573)
Foreign exchange difference and							
other movements	18.068	7.002	1.311	4.925	52	25	31.383
Gross carrying amount at							-
31 December	2.283.556	213.439	62.074	86.194	1.409	542	2.647.214
Less impairment allowance	(4.743)	(3.916)	(37.560)	(234)	(17)	(194)	(46.664)
Carrying amount at 31 December	2.278.813	209.523	24.514	85.960	1.392	348	2.600.550

The above balances contain €453,1 million of facilities secured by cash collateral as at 31 December 2022 (31 December 2021: €523,2 million). For these facilities no ECL is estimated as due to the nature of the security, no credit risk is assumed for these exposures.

The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2022 and that are still subject to enforcement activity is €6.694 thousand (2021: €6.095 thousand).

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

The following tables present the movement of the nominal amounts of financial guarantee contracts and other credit related commitments, and loan commitments by stage in 2022 and 2021, respectively:

31 December 2022

	Lo	oan commitmen	ts	Financial g cred			
	12-month ECL €'000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	12- month ECL €'000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	Total €′000
Nominal amount at							
1 January	508.096	31.573	776	152.277	14.148	356	707.226
Net increase/(decrease) Transfers:	(83.958)	(10.442)	(148)	47.456	(7.297)	34	(54.355)
- To 12-month ECL - To lifetime ECL not credit-	5.163	(5.103)	(60)	1.224	(1.224)		-
impaired - To lifetime ECL credit-	(17.239)	17.280	(41)	(12.757)	12.757	*	•
impaired	(99)	(599)	698	(7)	(10)	17	-
Nominal amount at 31				***************************************			
December	411.963	32.709	1.225	188.193	18.374	407	652.871

	Lo	oan commitment	ts	Financial g cred			
	12-month ECL €′000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	12- month ECL €'000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	Total €′000
Nominal amount at							2000
1 January	413.814	19.508	844	139.374	6.647	143	580.330
Net increase/(decrease) Transfers:	111.511	(4.930)	(302)	21.873	(1.306)	50	126.896
- To 12-month ECL - To lifetime ECL not credit-	2.227	(2.227)	-	702	(702)	-	-
impaired - To lifetime ECL credit-	(19.362)	19.412	(50)	(9.660)	9.660	-	-
impaired	(94)	(190)	284	(12)	(151)	163	-
Nominal amount at 31 December	508.096	31.573	776	152.277	14.148	356	707.226

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

The following tables present the movement of the impairment allowances for loans and advances to customers by product line and stage in 2022 and 2021, respectively:

31 December 202	31	Decem	her	2022
-----------------	----	-------	-----	------

	Who	olesale lendi	ng	f			
	12-month ECL	Lifetime ECL not credit- impaired	Lifetime ECL credit- impaired	12-month ECL	Lifetime ECL not credit- impaired	Lifetime ECL credit- impaired	Total
	€'000	€′000	€′000	€′000	€,000	€′000	€'000
Balance at 1 January	4.743	3.916	37.560	234	17	194	46.664
New financial assets originated or purchased	2.025	-	÷	74	-	-	2.099
Transfers:		(4.050)	1471	111	(2)	(108)	_
- To 12-month ECL	1.363	(1.350)	(13)	111	(3)	(100)	_
 To lifetime ECL not credit-impaired 	(406)	439	(33)	(1)	1	-	-
 To lifetime ECL credit- impaired 	(496)	(239)	735	(2)	(1)	3	(0.705)
Impact of ECL net remeasurement	(3.290)	674	(1.053)	(75)	(1)	9	(3.736)
Amounts written off	-	-	(49)	•	-	-	(49)
Recoveries from written off loans	-	-	719	<u>.</u>		-	719
Foreign exchange difference and other movements	(47)	6	(31)	8	-	(3)	(67)
Balance at 31 December	3.892	3.446	37.835	349	13	95	45.630

	Who	olesale lendir	•	f	Retail lending	1:6-1:	
		Lifetime	Lifetime		Lifetime	Lifetime	
		ECL not	ECL		ECL not	ECL	
	12-month	credit-	credit-	12-month	credit-	credit-	
	ECL	impaired	impaired	ECL.	impaired	impaired	Total
	€′000	€′000	€'000	€′000	€′000	€′000	€′000
Balance at 1 January	3.700	1.932	39.847	353	7	126	45.965
New financial assets originated							
or purchased	1.975	-	+	59	-	-	2.034
Transfers:							
- To 12-month ECL	172	(172)	-	-	-	-	-
- To lifetime ECL not credit-impaired	(206)	4.240	(4.034)	(7)	7	-	-
- To lifetime ECL credit- impaired	(4)	(207)	211	(10)	(1)	11	
Impact of ECL net remeasurement	(892)	(1.876)	2.465	(160)	5	69	(389)
Amounts written off	-	-	(731)	~	-	(12)	(743)
Recoveries from written off loans	-	-	-	-	-	*	-
Foreign exchange difference and							
other movements	(2)	(1)	(198)	(1)	(1)		(203)
Balance at 31 December	4.743	3.916	37.560	234	17	194	46.664

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

The following tables present the movement of the impairment allowances on financial guarantee contracts and other credit related commitments, and loan commitments by stage in 2022 and 2021, respectively:

31 December 2022

	Lo	an commitme	ents	Financial other cre			
	12- month ECL €'000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	12- month ECL €'000	Lifetime ECL not credit- impaired €'000	Lifetime ECL credit- impaired €'000	Total €′000
Balance at 1 January	1.307	2.290	-	1.114	390	283	5.384
Net increase / (decrease) Transfers:	383	(101)	-	1.627	(87)	21	1.843
- To 12-month ECL - To lifetime ECL not credit-	11	(11)	•*	1	(1)	-	-
impaired Impact of ECL net	(1.332)	1.332	-	(135)	135	_	-
remeasurement	1.105	251	•	(233)	(94)	(2)	1.027
Balance at 31 December	1.474	3.761	-	2.374	343	302	8.254

				Financial			
	Lo	an commitme	nts	other credit related commitments			
		Lifetime	Lifetime		Lifetime		
	12-	ECL not	ECL	12-	ECL not	Lifetime	
	month	credit-	credit-	month	credit-	ECL credit-	
	ECL	impaired	impaired	ECL	impaired	impaired	Total
	€′000	€′000	€′000	€′000	€′000	€′000	€′000
Balance at 1 January	1.137	502	~	900	209	-	2.748
Net increase / (decrease)	629	(66)	(2)	361	(61)	156	1.017
Transfers:							
- To 12-month ECL	8	(8)	-	19	(19)	-	_
 To lifetime ECL not credit- 							
impaired	(1.477)	1.477	-	(195)	195	_	_
- To lifetime ECL credit-							
impaired	-	-	-	(3)	(124)	127	-
Impact of ECL net					. ,		
remeasurement	1.010	385	2	32	190	_	1.619
Balance at 31 December	1.307	2.290	-	1.114	390	283	5.384

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

Impairment allowances on financial guarantee contracts and other credit related commitments and loan commitments is presented within "Other liabilities" (note 25).

The impairment losses relating to loans and advances to customers and on financial guarantee contracts and other credit related commitments and loan commitments recognised in the Bank's income statement for the year ended 31 December 2022 amounted to €1.233 thousand (2021: €3.737 thousand) and are analysed as follows:

	2022	2021
	€′000	€′000
(Reversal of impairment allowance)/impairment allowance on loans		
and advances to customers	(1.637)	1.090
Modification loss on loans and advances to customers	-	11
Impairment allowance on loan commitments	1.638	1.958
Impairment allowance on financial guarantee contracts and other		
credit related commitments	1.232	678
Total	1.233	3.737

As described in note 3.1 the Bank continues to monitor closely and constantly re-assesses all the latest available information due to the high uncertainty, arising from the subsequent rounds of lockdowns in Cyprus and abroad and their negative effect on the economies in which the Bank operates, the nature, size and effectiveness of the government support measures, as well as the consumer and investment post-crisis behavioural impact.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

Credit-impaired loans and advances to customers

The following tables present the ageing analysis of credit-impaired (Stage 3) loans and advances to customers by product line at their gross carrying amounts, as well as the respective cumulative impairment allowances and the value of collaterals held to mitigate credit risk as at 31 December 2022 and 2021, respectively:

31 December 2022

	Retail lending				31 December 2022				
					Wholesale lending				
	Mortgage €'000	Consumer €'000	Affluent banking €'000	Credit card €'000	Large corporate €'000	Wealth management €'000	International business banking €'000	Shipping €'000	Lifetime ECL credit- impaired €'000
Up to 89 days	_	4	18	34	38.184	8,849	13	_	47.102
90 to 179 days		-	5	2	669	352	26	_	1.054
180 to 360 days	=	26	7	8	46	11	3		101
More than 360 days	97	12		3	13.999	5.797	1	1.833	21.742
Total gross									
carrying amount Impairment	97	42	30	47	52.898	15.009	43	1.833	69.999
allowance	-	(42)	(12)	(41)	(26.810)	(9.186)	(6)	(1.833)	(37.930)
Carrying amount	97	-	18	6	26.088	5.823	37	-	32.069
Value of collateral	97	-	18	6	50.120	14.225	37		64.503
		Retail lend	31 December 2021			In a dia -			
		Retairient	nug		Wholesale lending International				435.4
	Mortgage €′000	Consumer €'000	Affluent banking €'000	Credit card €'000	Large corporate €'000	Wealth management €'000	business banking €'000	Shipping €'000	Lifetime ECL credit- impaired €'000
Up to 89 days	-	4	367	27	25.037	8.244	4	_	33,683
90 to 179 days	-	1	-	2	-	1.785		-	1.788
180 to 360 days	97	-	5	10	3.063	2.384	-	-	5.559
More than 360 days	_	12	16	1	12.468	6.086	1.276	1.727	21.586
Total gross carrying amount Impairment	97	17	388	40	40.568	18.499	1.280	1.727	62.616
allowance	-	(17)	(137)	(40)	(24.400)	(10.158)	(1.275)	(1.727)	(37.754)
Carrying amount	97	*	251	-	16.168	8.341	5		24.862
Value of									
collateral	97	_	347	-	34.961	17.772	1.279	-	54.456

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (a) Credit quality of loans and advances to customers (continued)

Loans and advances to customers at amortised cost – overdue status

The following table sets out information about the overdue status of loans and advances to customers in Stages 1 and 2:

	31 December 2022			31 December 2021		
	Stage 1 €'000	Stage 2 €'000	Total €'000	Stage 1 €′000	Stage 2 €'000	Total €'000
Current	2.473.237	225.849	2.699.086 2.877	2.369.339 411	214.507 14	2.583.846 425
Overdue less than 30 days Overdue more than 30 days	2.875	3.586	3.586		327	327
Gross carrying amount	2.476.112	229.437	2.705.549	2.369.750	214.848	2.584.598
Impairment allowance	(4.241)	(3.459)	(7.700)	(4.977)	(3.933)	(8.910)
Carrying amount	2.471.871	225.978	2.697.849	2.364.773	210.915	2.575.688

Regulatory definitions

The new definition of default ("DoD") for regulatory purposes introduced a new set of standards that will have a significant impact on governance, data, processes, systems and credit models. The new DoD is applicable from 1 January 2021 and is set in the Article 178 of Regulation (EU) No. 575/2013, the Commission Delegated Regulation (EU) 2018/171 and European Banking Authority Guidelines (EBA/GL/2016/07). It aims at the harmonisation of the definition of default across institutions and jurisdictions in the European Union. In particular, the new DoD guidelines specify that days past due are counted from the date that both materiality thresholds are breached (an absolute amount of the total exposure and a relative as a percentage of the exposure), include conditions for a return to non-defaulted status (introduction of a probation period) and explicit criteria for classification of restructured loans as defaulted when the diminished financial obligation criterion is satisfied (difference between the net present value of cash flows before and after the restructuring exceeds the threshold of 1%). The DoD guidelines specify for corporate exposures an absolute threshold of €500 and a relative threshold of 1% of total exposure of the customer while for retail exposures the thresholds are €100 and 1% respectively. For an exposure to be classified as defaulted, it must exceed both thresholds for 90 consecutive days.

The Bank is applying the above new provisions of DoD, in order to identify defaulted exposures starting from 1 January 2021, consistently across all its lending portfolios. Accordingly, the definition of default for accounting purposes is aligned with the new DoD, that is also the one used for internal credit risk management purposes. The impact in the Bank's Excepted Credit Loss from the implementation of the new definition of default is not material.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)

(b) Forbearance

Modifications of the loans' contractual terms may arise due to various factors, such as changes in market conditions, customer retention and other factors as well as due to the potential deterioration in the borrowers' financial condition. The Bank has employed a range of forbearance solutions in order to enhance the management of customer relationships and the effectiveness of collection efforts, as well as to improve the recoverability of cash flows and minimise credit losses for both retail and wholesale portfolios.

The following tables present an analysis of the Bank's forbearance activities for loans measured at amortised cost. The tables below are presented on a gross carrying amount basis, while cumulative impairment allowance is presented separately, in line with the Bank's internal credit risk monitoring and reporting.

The following table presents a summary of the types of the Bank's forborne activities:

	2022	2021
	€′000	€′000
Forbearance measures:		
Loan term extension	67.707	62.473
Arrears capitalisation	1.446	1.700
Reduced payment below interest owed	244	
Interest rate reduction	57	82
Reduced payment above interest owed	30.598	31.035
Arrears repayment plan	1.620	117
Interest only	8.382	12.263
Grace period	22.794	20.845
Partial debt forgiveness/write-down	-	609
Other	1.296	1.217
Total gross carrying amount	134.144	130.341
Less impairment allowance	(20.515)	(17.762)
Total carrying amount	113.629	112.579

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (b) Forbearance (continued)

The following tables present a summary of the credit quality of forborne loans and advances to customers:

		31 December 202	22
	Total loans & advances at amortised cost €'000	Forborne loans & advances €'000	% of forborne loans & advances to total loans & advances
Gross carrying amount:			
12-month ECL	2.476.112	-	-
Lifetime ECL not credit-impaired	229.437	91.911	40,1
Lifetime ECL credit-impaired	69.999	42.233	60,3
Total gross carrying amount	2.775.548	134.144	4,8
Impairment allowance:			
12-month ECL	4.241	-	-
Lifetime ECL not credit-impaired	3.459	959	27,7
Lifetime ECL credit-impaired	37.930	19.556	51,6
Total impairment allowance	45.630	20.515	45,0
Carrying amount	2.729.918	113.629	4,2
Collateral received	2.427.134	129.593	
		31 December 20	21
	T. (- 1 1 0	Forborne	21
	Total loans &	loans &	0/ - C C1
	advances at amortised cost	advances	% of forborne loans
	amortised cost €'000	e′000	& advances to total loans & advances
Gross carrying amount:			
12-month ECL	2.369.750	2.353	0,1
Lifetime ECL not credit-impaired	214.848	95.156	44,3
Lifetime ECL credit-impaired	62.616	32.832	52,4
Total gross carrying amount	2.647.214	130.341	4,9
Impairment allowance:			
12-month ECL	4.977	_	-
Lifetime ECL not credit-impaired	3.933	989	25,1
Lifetime ECL credit-impaired	37.754	16.773	44,4
Total impairment allowance	46.664	17.762	38,1
Carrying amount	2.600.550	112.579	4,3
Collateral received	2.349.435	125.477	
			98

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)

(b) Forbearance (continued)

The following table presents the movement of forborne loans and advances to customers:

	2022	2021
	€′000	€′000
Gross carrying amount at 1 January	130.341	64.460
Forbearance measures in the year ¹	19.741	78.092
Repayment of loans	(12.620)	(10.208)
Forborne loans derecognised	690	118
Write-offs of forborne loans	-	(111)
Loans & advances that exited forbearance status	(4.008)	(2.010)
Gross carrying amount	134.144	130.341
Less impairment allowance	(20.515)	(17.762)
Carrying amount at 31 December	113.629	112.579

¹ Forbearance measures in the year depict loans to which forbearance measures were granted during the reporting period.

The following table presents the Bank's exposure to forborne loans and advances to customers by product line:

	2022	2021
	€′000	€′000
Retail lending:		
- Affluent banking	74	184
Wholesale lending:		
- Large corporate	109.878	103.588
- Wealth management	24.192	26.569
Total gross carrying amount	134.144	130.341
Less impairment allowance	(20.515)	(17.762)
Total carrying amount	113.629	112.579

The following table presents the Bank's exposure to forborne loans and advances to customers by geographical region. For this table, the Bank has allocated exposures to regions based on the country of residency/incorporation of counterparties.

	2022	2021
	€′000	€′000
Cyprus	133.900	127.877
Other European countries	-	54
Other countries	244	2.410
Total gross carrying amount	134.144	130.341
Less impairment allowance	(20.515)	(17.762)
Total carrying amount	113.629	112.579

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)

(b) Forbearance (continued)

The following table provides information on modifications due to forbearance measures on lending exposures which have not resulted in derecognition. Such financial assets were modified while they had an impairment allowance measured at an amount equal to lifetime ECL.

Modified lending exposures	2022	2021
	€′000	€′000
Loans modified during the year with impairment allowance measured at an amount equal to lifetime ECL		
Carrying amount	26.757	90.712
Modification loss	•	11
Loans modified since initial recognition at a time when impairment allowance was based on lifetime ECL		
Gross carrying amount at 31 December for which impairment allowance has changed to 12-month ECL measurement	1.185	2.221

In the year ended 31 December 2022, the gross carrying amount of loans previously modified for which the loan allowance has reverted to being measured at an amount equal to lifetime ECL amounted to €151 thousand (2021: €118 thousand).

(c) Collaterals held and other credit enhancements

The Loan-to-Value (LTV) ratio of the Bank's lending reflects the gross loan exposure less any cash collateral held at the balance sheet date over the market value of the property held as collateral.

The LTV ratio as at 31 December 2022 and 2021 is presented below:

	2022	2021
	€′000	€′000
Less than 50%	788.100	716.041
50%-70%	489.921	474.244
71%-80%	82.554	111.098
81%-90%	62.850	34.045
91%-100%	32.347	46.456
101%-120%	40.583	30.153
121%-150%	42.265	35.987
Greater than 150%	81.019	79.335
Total exposure	1.619.639	1.527.359
Average LTV	68%	73%

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.3 Loans and advances to customers (continued)
- (c) Collaterals held and other credit enhancements (continued)

The breakdown of collateral and guarantees for loans and advances to customers at amortised cost is presented below:

	V	31 D alue of collate	ecember 2022 ral received		
			Other		Guarantees
	Real Estate	Financial	Collateral	Total	received
	€′000	€′000	€′000	€′000	€'000
Retail lending	85.251	10.276	_	95.527	-
Wholesale lending	1.429.747	660.539	232.250	2.322.537	9.071
Total	1.514.998	670.815	232.250	2.418.064	9.071
	31 December 2021 Value of collateral received				
			Other		Guarantees
	Real Estate	Financial	Collateral	Total	received
	€′000	€′000	€′000	€′000	€′000
Retail lending	55.929	8.560	<u>.</u>	64.489	-
Wholesale lending	1.367.797	658.973	248.268	2.275.038	9.910
Total	1.423.726	667.533	248.268	2.339.527	9.910

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

4.2.1.4 Debt securities

The movement in impairment allowance of investment securities in 2022 and 2021 is as follows:

				securities at
				amortised
_	Investment	securities at F	VOCI	cost
		Lifetime ECL		_
	12-month	not credit-		12-month
	ECL	impaired	Total	ECL
	€′000	€′000	€′000	€′000
Balance at 1 January	832	-	832	171
New financial assets purchased	563	-	563	213
Transfer from 12-month ECL to Lifetime				
ECL not credit-impaired	(39)	39	-	-
Impact of ECL net remeasurement	(697)	109	(588)	(33)
Financial assets disposed during the year	(19)	-	(19)	-
Financial assets redeemed during the year	(12)		(12)	(7)
Balance at 31 December	628	148	776	344

31	DCCCIIII	ber 2021
Investr	Investment Investr	
securiti	es at	securities at
F	/OCI	amortised cost
12-month	ECL	12-month ECL
€	′000	€′000
Balance at 1 January	773	392
New financial assets purchased	373	2
	230)	(223)
Financial assets disposed during the year	(53)	•
Financial assets redeemed during the year	(31)	-
Balance at 31 December	832	171

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

4.2.1.4 Debt securities (continued)

The tables below present an analysis of debt securities by external credit rating agency designation at 31 December 2022 and 2021, respectively, based on Moody's ratings or their equivalent:

	3:	1 December 2022	
	Investment	Investment	
	securities at	securities at	
	FVOCI	amortised cost	Total
	€′000	€′000	€′000
Aaa	170.281	395.825	566.106
Aa1 to Aa3	22.234	23.756	45.990
A1 to A3	31.232	3.893	35.125
Baa1 to Baa3	185.555	-	185.555
Ba1 to Ba3	64.526	307.458	371.984
B1 to B3	20.662	7.213	27.875
Not rated		90.433	90.433
Gross carrying amount	494.490	828.578	1.323.068
Impairment allowance	_	(344)	(344)
Carrying amount	494.490	828.234	1.322.724
	31	. December 2021	
	Investment	Investment	
	securities at	securities at	
	FVOCI	amortised cost	Total
	€′000	€′000	€′000
Aaa	182.339	28.771	211.110
Aa1 to Aa3	46.479	**	46.479
A1 to A3	38.174	-	38.174
Baa1 to Baa3	216.509	-	216.509
Ba1 to Ba3	50.816	355.645	406.461
B1 to B3	14.566	_	14.566
Caa1 to Caa3	6.846	_	6.846
Not rated		74.969	74.969
Gross carrying amount	555.729	459.385	1.015.114
Impairment allowance	_	(171)	(171)
Carrying amount	555.729	459.214	1.014.943

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk

The Bank holds diversified portfolios across markets and countries and implements limits on concentrations arising from the geographical location or the activity of groups of borrowers that could be similarly affected by changes in economic or other conditions, in order to mitigate credit risk.

The following tables break down the Bank's exposure into loans and advances to customers and exposures of credit related commitments at their gross carrying amount and nominal amount respectively by stage, product line, industry and geographical region and impairment allowance by product line, industry and geographical region.

Notes to the financial statements

- Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.5 Concentration of credit risk (continued)
- (a) Geographical sectors

For this table, the Bank has allocated exposures to regions based on the country of activity/economic interest of counterparties.

		Cyprus				Other European countries	ountries			Other countries	ntries		
	Gross carr	Gross carrying/nominal amount	unt		Gross carry	Gross carrying/nominal amount	unt	'	Gross carn	Gross carrying/nominal amount	nount		
						Lifetime				lifotime			Total gross
		Lífetime ECL	Lifetime ECL			ECL not	Lifetime			ECL not	Lifetime		/ nominal
		not credit-	credit-	Impairment		credit-	ECL credit-	Impairment		credit-	ECt credit	Impairment	amount less
	12-month ECL	impaired	impaired	allowance	12-month ECL	impaired	impaired	allowance	12-month ECL	impaired	impaired	alfowance	imp. allowance
Loans and advances to customers	£1000	£.080	€.000	€,000	€,000	€,000	€,000	€′000	€,000	€,000	€,000	€,000	€,000
Retail lending:													
- Mortgage	13,881	82	65	(1)	•		•		1	,	i		14 059
- Consumer	20.582	#	42	(242)			,	•	•		•	•	20 383
Affluent banking	84.058	995	· 8	(165)	846		,	Ξ	27			,	85 847
Credit cards	813	25	47	(48)		1		·	j	•			267
Wholesale lending:			:		•				•	1	1		Š
Large corporate	848.659	198,032	51.695	(31,384)	384,665	13.973	1,203	(1.771)	50.992	•	•	(23)	1.516.041
Wealth management	245.680	9.894	14.236	(9.127)	123.002	6.093	612	(739)	4.773	783	161	(184)	394.634
- International business banking	407.504	55	22		63.499	н	7	(9)	739	m	41	, ,	471.838
Suidding	63.573	1	•	(31)	147.894		1.833	(1.901)	14.913	,	•	6	226.274
	1.684.750	209.084	66.169	(40.998)	719.913	20.067	3.655	(4.418)	71.449	286	175	(214)	2.729.918
Off-balance sheet items Financial guarantee contracts and other credit related													
commitments	176.592	16.013	399	(2.718)	10.715	2.361	•	(301)	888	1	00	,	203.955
Loan commitments	289.778	30,752	1.154	(3.744)	117.684	1.953	œ	(1.488)	4.501	4	89	(3)	440.662
•	466.370	46.765	1,553	(6,462)	178 200	VIC V	٥	14 7001	700 3			127	C13 643

Notes to the financial statements

4 Financial risk management and fair value (continued)

.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk (continued)

(a) Geographical sectors (continued)

		carying carying amount / nominal amount less imp. allowance £'000	12.548	20.220	54 192	740	?	1,473,525	372.112	465.111	202.102	7.600.550		154.934	250.040	701.042
ļ		impairment allowance £'000	•	•			Ī	(24)	(166)	•	(4)	(194)		' î	(13)	(13)
itries	ount	Lifetime ECL credit- impaired	ı	,		,	,	٠	161	4	-	165		e .	-	7
Other countries	Gross carrying/nominal amount	Lifetime ECL not credit- impaired £'000	•	į	i	•		•	258	ı		258		• ,		-
	Gross carryi	12-month ECL © 000	,	ı	' '	195	н	45.984	3.108	5,069	16.007	70.364		2.453	11,301	13,754
		Impairment allowance €'000		ı	•	•		(1.739)	(756)	(1.275)	(1.727)	(5.558)		(223)	(723)	(946)
21 ountries	unt	Lifetime ECL credit- impaired €'000			•	•	,	1.299	641	1.276	1.727	4.943		•	34	34
31 December 2021 Other European countries	Gross carrying/nominal amount	Lifetime ECL not credit- impaired €'000		•	•	•	į	15.761	6.425	ហ	•	22.191		2.381	4.788	7.169
	Gross carr	12-month EC. £′000			•	176	₽	363.738	95.225	72,225	127.448	658.813		6,473	118.108	124.581
		Impairment allowance €'000			(143)	(258)	(44)	(30.209)	(10.229)	,	(29)	(40.912)		(1.564)	(2.861)	(4.425)
	unt	Lifetime ECL credit- impaired £'000		97	17	388	40	39.769	17.697	. ' !		57.508		355	741	1.096
Cvarus	Gross carrying/nominal amount	Lifetime ECL not credit- impaired £'000		93	43	1.254	13	181 542	9 445		'	192.399		11.767	26.784	38.551
	Gross carn	12-month ECL		12.358	20.303	52.437	723	500 TZ8	250 302	387.805	58.741	1.640.573		143.351	378,687	522.038
			Loans and advances to customers Retail lending;	- Mortgage	- Consumer	- Affluent banking	- Credit cards	Wholesale lending:	- Large corporate		- Objective Despites Despites Despites	Total	Off-balance sheet items Financial programme and other readit related	commitments	oan commitments	Total

As at 31 December 2022 and 2021, there were no loans and advances to customers measured mandatorily at FVTPL.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.5 Concentration of credit risk (continued)
- (a) Geographical sectors (continued)

	Multilateral	31 De	cember 202 Other	22	
	development		European	Other	
	banks	Cyprus	countries	countries	Total
	€′000	€′000	€′000	€′000	€'000
On-balance sheet assets					
Balances with central banks	-	3.266.706	-	**	3.266.706
Due from credit institutions at AC	-	31	1.520.935	5.956	1.526.922
Derivative financial instruments	<u></u>	125	23.813	_	23.938
Investment debt securities at FVOCI	4.625	79.211	250.777	159.877	494.490
Investment debt securities at AC	25.102	303.394	174.568	325.514	828.578
Other investment securities					
mandatorily at FVTPL	-	1.959		-	1.959
Other assets	-	321	294	37	652
Gross carrying amount	29.727	3.651.747	1.970.387	491.384	6.143.245
Balances with central banks	_	_	_		-
Due from credit institutions at AC	_	_	2		2
Derivative financial instruments	<u></u>	•	-	_	_
Investment debt securities at AC	26	146	90	82	344
Other assets	-	_	-	-	-
Impairment allowance	26	146	92	82	346
Carrying amount	29.753	3.651.893	1.970.479	491.466	6.142.899

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.5 Concentration of credit risk (continued)
- (a) Geographical sectors (continued)

		31 De	cember 202	21	
	Multilateral		Other		
	development		European	Other	
	banks	Cyprus	countries	countries	Total
	€′000	€′000	€′000	€′000	€′000
On-balance sheet assets					
Balances with central banks	-	2.826.787	-	-	2.826.787
Due from credit institutions at AC	-	31	1.558.825	67.968	1.626.824
Derivative financial instruments	-	152	18.356	31	18.539
Investment debt securities at FVOCI	4.622	65.383	292.067	193.657	555.729
Investment debt securities at AC	-	355.645	101.633	2.107	459.385
Other investment securities					
mandatorily at FVTPL	-	1.995	-	-	1.995
Other assets	_	382	-	23	405
Gross carrying amount	4.622	3.250.375	1.970.881	263.786	5.489.664
					4.0
Balances with central banks	-	13	-	-	13
Due from credit institutions at AC	-	-	11	15	26
Derivative financial instruments		-	-	-	
Investment debt securities at AC	-	166	5	-	171
Other assets	-		-	-	-
Impairment allowance		179	16	15	210
Carrying amount	4.622	3.250.196	1.970.865	263.771	5.489.454

All assets shown in the tables above are classified in 12-month ECL category.

Notes to the financial statements

- Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.5 Concentration of credit risk (continued)

(b) Industry sectors

The following tables break down the Bank's main exposures into balance sheet assets and credit related commitments at their gross carrying amount and nominal amount respectively by stage, product line and industry sector and impairment allowance by product line and industry sector.

				Total	carrying	amount	000.3			14.059	20.383	85.842	847		1.516.041	394.634	471.838	226.274	2.729.918
					ľmp	allowance	C000			1	•	٠	,		(23)	3	•	,	(24)
			Lifetime	ECL credit-	impaired		£,000			٠		,			,	•	1		,
	Other	Gross carrying amount	Lifetime	ECI not	credit-	impaired	C,000			•			,		922	277	,		1.499
		Gross		12.	month	<u>ದ್</u> ವ	€,000			ı	1	¥	п		1.057	7.2	4	,	2.039
					Imp.	allowance	000			٠	<u>(5)</u>	•	•		(322)	(1)	Ü	-	(966)
	ring		Lifetime	EC. credit-	impaired		C000				4	•			376		ŀ		380
	Manufacturing	Gross carrying amount	Lifetime	ECL not	credit-	impaired	C000				,	,			6.765		٠		6.765
		Gross		12-month	걸		000.3			ŀ	,	,	•		162.680	140	24.928		187.748
		-			шb.	allowance	0000			i.					(1.179)	•	Þ	,	(1.179)
2022	ion		Lifetime	ECL credit-	impaired		€.000			•	,	•	٠		1.536		1		1.536
51 December 2022	Construction	Gross carrying amount	Lifetime	ECL not	credit-	impaired	€,000			,	,		,		4,132		•	-	4.132
		Gross		4	month	ם	C000					111	m		40,138	195	,		40.447
		F			ď	allowance	6,000			3	(13)	(165)	(40)		(3.532)	(4.903)	(9)		(8.560)
	quaps		Lifetime	EC. credit	impaired		6,000			26	12	30	94		4.327	6.544	11		11.061
	Private Individuals	Gross carrying amount	Lifetime	EQ not	credit	impaired	C000			82	н	566	23		662	3,984	č.		5.802
		Gross		12-month	ជួ		€.000			13.881	3.895	82.990	25		12.891	157.258	7.265	17	278.381
		ł			lmp,	allowance	€,000			ı	(225)	(1)	(8)		(27.489)	(5.145)	,	(1.939)	(34.807)
	rvices		Lifetime	ECL credit-	impaired		C.000				56		7		46.659	8,465	32	1,833	57.022
	Commerce & services	Gross carrying amount	Lifetime	ECI, not	credit	impaired	€,000			i		,	٠		199.524	11.709	us	,	211.239
		Gross ca		12-month	Ę,	-	000	ŗ			16.687	1.848	135		1.067.550	214,865	439,549	226.363	1.966.997
	ļ			r				Loans and advances to customers				king		Jing:				ļ	1.
								Loans and adv	Retail lending:	- Mortgage	- Consumer	- Affluent banking	- Credit cards	Wholesale lending:	- Large corporate - Wealth	management - International	business banking	- Shipping	Total

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk (continued)

				Total	carrying	amount	£.000		10,640	£	20.220	\$4.192	740		1.473.525	372,112	465.111	202,102	0.5500.550	2000
					lmp.	alfowance	6,000			4			•		(22)	වි			ç	1221
			Lifetime ECL	gedlt	Impaired		€,000						•		838		•	,	ę.	262
	Other	Gross carrying amount	Lifetime Li	ECt not	credit	impaired	6,000						•		•	,				'
		Gross		ij	month	ដ្ឋ	€,000				•	•	=		69.573	1,831	•			71.415
		1			dE.	allowance	€,000			•	<u>4</u>	٠	•		(1.118)		1	٠		(1.122)
	ling		Lifetime	ECL credit-	Impaired		€.000			•	4	•	,		390	,				394
	Manufacturing	Gross carrying amount	Lifetime	ECL not	credit	impaired	€,000			•		٠	ı		3.224	1				3.224
		Gross		12-month	ဌ		6.000						,		629'601	ĸ	37.144	•		146.855
		-			ď E	allowance	6,000						1		(1.361)					(1.361)
120	ou		Lifetime ECL	credit-	impaired		6.000						•		1,686	•	,			1.686
31 December 2021	Construction	Gross carrying amount	Ufetime Life	ECL not	credit-	Impaired	6,000			,		1	1		2.533	,			•	2,533
		Gross		ដ	month	EG	€.000				2	136	ы		40.263		9		•	40.410
		I			imp.	allowance	€,000				(rr)	(257)	(33)		(3.525)	(4.739)	(1.275)		-	(9.842)
	sjenp		Ufetime	ECI, credit-	impaired		4,000			26	12	388	8		4.965	3.062	1,281			14,855
	Private Individuals	Gross carrying amount	Lifetime	ECL not	credit-	impaired	6,000			86	•	255	19		348	6.047				7,768
		Gross		12-month	ដ		€.000			12.358	3.711	52.495	\$09		16,893	159.369	2.053		22	252.505
					ä	allowance	€.000				(126)	Έ	3 (3)		(25.946)	(6.410)		•	(1.821)	(34.315)
	vices		lifetime	FCI credit-	mpaired		£1000						ទ		34 527	10.417			1.77,	45,681
	Commerce & services	Gross carrying amount	Hetime			imoaired	6,000			1	43	: '			190 360	2000	***************************************			200,485
		Gross ca		12-month	9	į	€'000	Ş.			16.591		107		1031 278	107 403	TOTAL 001	420.895	202.174	1.358,565
			- Liberton					Loans and advances to customers	Retail lendlog:	- Mortgage	- Consumer		- Americ Danking - Credit cards	Wholesale lending:			- International	Dusiness Danking	- Shipping	Total

As at 31 December 2022 and 2021, there were no loans and advances to customers measured mandatorily at FVTPL.

Notes to the financial statements

Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk (continued)

			Total	iedimon	amount	fess imp.	allowance	000,3	203.955	440.662	644.617
						ímp.	allowance	6,000	,	â	(2)
	b				Lifetime	EC. credit-	impaired	000,3	•		,
	Officer	Nominal amount		Uffetime	EC not	credit	impaired	€,000		10	10
		-			ä	month	ដូ	€,000	497	1.470	1.967
						dw _l	allowance	€,000	9	(233)	(241)
	uring				Lifetime	ECI, credit-	impaired	0003 C000	ın	•	5
	Manufacturing	Nominal amount		Lifetime	ECL not	credit-	impaired	C,000	ę,	1.147	1,242
		2				12-month	£	£000	4.798	72.297	77.095
		i				in G	allowance	C,000	(1.445)	(350)	(1,795)
or 2022	rction				Lifetime	EQ. credit-	impaired	6,000		-	
31 December 2022	Construction	Nominal amount		Lifetime	EQ. not	credit-	impaired	€,000	2.417	3.528	5.945
					ä	month.	ದ್ವ	C,000	58.781	12.632	71.413
		•				ď.	allowance	€,000	(2)	(248)	(255)
	ividuals				Lifetime	ECL credit-	impaired	€,000		59	59
	Private Individuals	Nominal amount		Lifetime	ECL not	credit-	impaired	در000	m	316	319
		Z				12-month	ĘĠ.	C,000	2.388	63.739	66.127
		1				imp.	allowance	6,000	(1.559)	(4.402)	(5.961)
	services				Lifetime	ECL credit-	impaired	C,000	402	1.166	1.568
	Commerce & services	Nominal amount		Lifetime	ECt. nat	credit	impaired	€,000	15.859	27.708	43.567
		ž				12-month	멆	£,000	121.729	261.825	383.554
	ı	ı							Off-balance sheet items Financial guarantee Contracts and other credit related commitments	Loan commitments	Total

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk (continued)

		Total	nominal	amount	less imp.	allowance	6,000		164.994	536.848	701,842
					тр.	allowance	6.000		Ŧ	(25)	(56)
				Lifetime ECL	medit-	impaired	6,000				
Other	Nominal amount		Lifetime	ECL not	credit-	impaired	6.000			•	
	Z			ដ	топт	겁	6.000		13.758	1.747	15,505
	·				ğ.	allowance	€,000		(12)	(249)	(261)
turing				Lifetime	ECL credit-	impaired	6,000		49		88
Manufacturing	Nominal amount		Lifetime	ECL not	credit	impaired	€,000		31	1.682	1.713
	Ź				12-month	ដ្ឋ	6,000		7,951	68.370	76.321
					imp.	allowance	€.000		(481)	(645)	(1.126)
r 2021 ction				Lifetime ECL	credit	impaired	000.3		1	,	
31 December 2021 Construction	Nominal amount		Lifetime	ECI. not	credit-	Impaired	6,000		3,968	5.20\$	9.176
				-21	month	ដ	€,000		23.760	25.725	49,485
					Ē	allowance	6000		ε	(124)	(131)
y				Lifetime	ECL credit-	beniedali	C000		•	128	128
arked and wheel	Nominal amount		Lifetime	EQ. not	-tipero	perirous	6000		ın	450	455
					12-month	S	6000		3.775	58.686	62.461
		1			ğ	- distribution	000.3		(3.286)	(2.554)	(3.840)
	s services			ifetime	1		e'000		348	. 99	986
·	Commerce & services	All and an inches	ifetime		aradi.		e,000		10.144	74.733	34.377
	2				4	75.480414	1 000 1 000		103.033	353 568	456.601
	4	ř						Off-balance sheet items Financial guarantee	credit related	Controller Committee of Controller	Total

Notes to the financial statements

4 Financial risk management and fair value (continued)

2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk (continued)

					31 December 2022	322			
	Central		Commerce	Banks & financial	Driveto	Constant	Manufa		
	banks	Sovereigns	& services	institutions	individuals	ction	cturing	Other	Total
On-balance sheet assets	€,000	€,000	€′000	€′000	€′000	€′000	€′000	€,000	€′000
Balances with central banks	3.266.706	1	٠	•	1		,	1	3.266.706
Due from credit institutions at AC	•		•	1.526.922	1	1	ı	٠	1.526.922
Derivative financial instruments	1	•	125	23.812	1	•	1	ı	23.938
Investment debt securities at FVOCI	•	360.669	,	85.507	1	1	1	48.314	494.490
Investment debt securities at AC	•	614.528	1	16.486	r	1	1	197.564	828.578
Other investment securities mandatorily at FVTPL	,	•	•	1.959	•	1	•	ı	1.959
Other assets		J	615	•	ŧ	1	ı	37	652
Gross carrying amount	3.266.706	975.197	740	1.654.686	1	1	b	245.915	6.143.245
Balances with central banks	1		•	•	•	•	i	1	•
Due from credit institutions at AC	•	t	•	2	1	ı	1	•	2
Investment debt securities at AC	•	224	•	59	I	ŧ	ı	61	344
Other assets	4	•	1	•	1	1	*	ł	3
Impairment allowance		224		61	4	£		61	346
Carrying amount	3.266.706	975.421	740	1.654.747	Ŧ	ŀ	•	245.976	6.142.899

Notes to the financial statements

Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.1 Credit risk (continued)

4.2.1.5 Concentration of credit risk (continued)

	Total €′000	2.826.787 1.626.824 18.539 555.729 459.385 1.995 405 5.489.664 171 26 171	
	Other €′000	30 75.668 103.741 23 179.462 5 5	101:01
	Manufa- cturing €′000		,
Ε.	Constru- ction €′000		
31 December 2021	Private individuals €′000	: (स्व ()) स्व)	-1 ·
	Banks & financial institutions €′000	1.626.824 18.354 91.982 1.995 1.739.155	1.739.129
	Commerce & services €′000	154	536
	Sovereigns €′000	388.079 355.644 - 743.723	743.557
	Central banks €′000	2.826.787	2.826.774
		On-balance sheet assets Balances with central banks Due from credit institutions at AC Derivative financial instruments Investment debt securities at FVOCI Investment debt securities at AC Other investment securities mandatorily at FVTPL Other assets Gross carrying amount Balances with central banks Due from credit institutions at AC Investment debt securities at AC Other assets	Carrying amount

All assets shown in the tables above are classified in 12-month ECL category.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.1 Credit risk (continued)
- 4.2.1.6 Other financial assets

Balances with central banks

The Bank held balances with central banks of €3.258.922 thousand at 31 December 2022 (2021: €2.826.774 thousand), which are not rated. The Central Bank of Cyprus is not rated by itself. The rating of Republic of Cyprus, which was BA1 (Moody's rating scale) as at 31 December 2022, can be used as an approximation.

Investment securities - equity shares

The Bank did not hold equity shares as at 31 December 2022 and 2021.

Investment securities - UCIT funds

The Bank held UCIT funds of €1.959 thousand at 31 December 2022 (2021: €1.995 thousand) which are not rated.

4.2.2 Market risk

The Bank takes on exposure to market risks which is the risk of potential financial loss due to an adverse change in market variables. Changes in interest rates, foreign exchange rates, credit spreads, equity prices and other relevant factors, such as the implied volatilities of the above, can affect the Bank's income or the fair value of its financial instruments. The market risks the Bank is exposed to are managed and monitored by the Market, Counterparty and Liquidity Risk Unit (MCLRU).

The MCLRU reports to the Bank's Risk Executive, and its main responsibilities include:

- Monitoring of all key market & Interest Rate Risk in the Banking Book (IRRBB) risk indicators (VaR, sensitivities, interest rate gaps) of the Bank;
- Implementation of Stress Testing methodologies for market risk and IRRBB (historical and hypothetical);
- Monitoring and reporting of market, counterparty and IRRBB risk limits utilisation;
- Measuring and monitoring the liquidity risk of the Bank; and
- Development, maintenance and expansion of risk management infrastructure.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.2 Market risk (continued)

The market risks the Bank is exposed to are the following:

Interest rate risk

The Bank takes on exposure to the effects of fluctuations in the prevailing levels of market interest rates on its financial positions and cash flows. Cash flow interest rate risk is the risk that the future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Fair value interest rate risk is the risk that the value of a financial instrument will fluctuate because of changes in market interest rates. Fair value interest rate risk is further split into "General" and "Specific". The former refers to changes in the fair value of positions due to the movements of benchmark interest rates, while the latter refers to changes in the fair value of position due to the movements of specific issuer yields and credit spreads.

Interest margins may increase as a result of such changes but may reduce or create losses in the event that unexpected adverse movements arise. The Bank's Risk Committee sets limits on the level of mismatch of interest rate repricing that may be undertaken and exposures are monitored daily.

The Bank is monitoring the interest rate risk in the banking book (IRRBB) affecting both its earnings and economic value using Gap analysis. The Bank uses internal reports for the monitoring of IRRBB taking into account FVOCI and AC portfolios (Ioans, deposits and debt securities), including sensitivity of NII and sensitivity of Bank's EVE (Economic Value of Equity) on multiple scenarios of interest rates. For the calculation of these sensitivities, specific assumptions are made regarding non-maturity deposits (NMDs). These assumptions are based on historical observations processed using statistical analysis or are based on studies that summarise the IRRBB practices at the European level. The Bank takes all appropriate measures to limit the IR risk associated with these financial instruments either by matching interest-bearing financial assets with interest bearing financial liabilities of the same repricing maturity, or entering into interest rate swaps to hedge interest rate risk.

Currency risk

The Bank takes on exposure to the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. The Risk Committee sets limits on the level of exposures which are monitored daily.

Equity price risk

Equity price risk is the risk of the decrease of fair values as a result of changes in the levels of equity indices and the value of individual stocks. The equity price risk that the Bank undertakes arises mainly from equity positions.

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.2 Market risk (continued)

Interest Rate Gap Analysis (IR Gap)

The table below exhibits the IR Gap analysis of the on- and off-balance sheet items of the Bank. The allocated percentages at each time band correspond to the proportion of the repricing amount of each balance sheet category.

		31 D	ecember 202	2	
	less than 1	1-3	3-12	1-5	More than
	month	months	months	years	5 years
On-Balance Sheet:					
Cash & bank balances	89%	11%	0%	0%	0%
Loans & advances to customers	55%	34%	8%	1%	2%
Investment securities	9%	3%	10%	68%	10%
Due to banks	96%	3%	0%	0%	1%
Customer deposits	86%	7%	7%	0%	0%
Off-Balance Sheet :					
Derivative assets	51%	28%	11%	9%	1%
Derivative liabilities	43%	27%	1%	15%	14%
		31 D	ecember 202	1	
	less than 1	1-3	3-12	1-5	More than
	month	months	months	years	5 years
On-Balance Sheet:				•	·
Cash & bank balances	98%	2%	0%	0%	0%
Loans & advances to customers	51%	34%	12%	1%	2%
Investment securities	3%	2%	16%	67%	12%
Due to banks	98%	0%	0%	0%	2%
Customer deposits	87%	4%	9%	0%	0%
Off-Balance Sheet:					
Derivative assets	84%	7%	0%	2%	7%
Derivative liabilities	84%	7%	0%	2%	7%

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.2 Market risk (continued)

MtM Volatility - VaR summary

The Bank measures the financial risk of the FVOCI portfolio using a "Value at Risk" (VaR) model.

The VaR model is used to measure the amount of potential negative change in the market value of the FVOCI portfolio over a specified period of time and at a given confidence level. The Bank uses a VaR model based on 99% confidence level and a holding period of 10-day. The methodology used for the calculation is Monte Carlo simulation (full re-pricing of the positions is performed).

The VaR model is designed to measure market risk in a normal market environment. It is assumed that any changes occurring in the risk factors affecting the normal market environment will follow a normal distribution.

Although VaR is an important tool for measuring market risk, the assumptions on which the model is based do give rise to certain limitations. Given this, actual outcomes are monitored regularly, via back testing process, to test the validity of the assumptions and the parameters used in the VaR calculation.

Since VaR constitutes an integral part of the Bank's market risk control regime, VaR limits have been established and actual exposure is reviewed daily. However, the use of this approach does not prevent losses outside of these limits in the event of extraordinary market movements.

The below table shows VaR by risk type for the Bank's FVOCI portfolio:

	2022	2021
	€′000	€′000
Interest rate risk	2.599	2.708
Foreign exchange risk	737	2
Issuer specific risk	1.751	1.301
Total VaR	3.010	2.215

The largest portion of the Bank's VaR figure is attributable to the risk associated with interest rate and credit spread risk factors. The aggregate of the VaR results per risk factor does not constitute the Bank's total VaR due to correlations and consequent diversification effects among risk factors.

The MtM of the FVOCI bond portfolio was negatively affected in 2022 due to the increase of yields and the widening of spreads. This was caused by the uncertainty for the speed and the magnitude of the monetary tightening of central banks to taper inflation.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.2 Market risk (continued)

MtM Volatility - VaR summary (continued)

The interest rate risk exposure of the Bank's FVOCI portfolio is analysed into time bands as shown in the following tables:

		33	1 December 202	22	
	less than 1 month €'000	1-3 months €'000	3-12 months €'000	1-5 years €'000	More than 5 years €'000
Investment securities	130.656	44.104	117.631	874.098	199.705
Fixed coupon bonds	20.360	10.000	117.631	874.098	199.705
Variable coupon bonds	110.296	34.104	-	-	-
		3:	1 December 202	21	
	less than 1	1-3			More than
	month	months	3-12 months	1-5 years	5 years
	€'000	€'000	€'000	€'000	€'000
Investment securities	39.769	22.105	85.587	423.762	26.000
Fixed coupon bonds	20.000	_	54.742	423.762	26.000
Variable coupon bonds	19.769	22.105	30.845	-	•

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.2 Market risk (continued)

Foreign exchange risk

The following tables present the Bank's exposure to foreign currency exchange risk as at 31 December 2022 and 2021, respectively:

			31	December	2022		
	USD	GBP	CHF	RUB	Other	Euro	Total
	€,000	€,000	€′000	€'000	€,000	€,000	€,000
ASSETS					_		2 200 700
Cash and balances with central banks	682	308	7	-	2	3.265.707	3.266.706
Due from credit institutions	345.232	1.548	1.724	1.775	5.269	1.171.372	1.526.920 23.938
Derivative financial instruments	5.613	43	-	-	1	18.281	
Loans and advances to customers	310.636	385.738	10.637	-	4.211	2.018.696	2.729.918
Investment securities	575.399	-	-	-	-	749.284	1.324.683
Investments in subsidiaries	-	-	-	-	-	10	10
Property and equipment	57		-	-	-	26.972	27.029
Intangible assets	=	-	-	-	-	27.595	27.595
Deferred tax assets	=	-	-	=	-	2.171	2.171
Other assets	322	42		28	-	1.553	1.945
Total assets	1.237.941	387.679	12.368	1.803	9.483	7.281.641	8.930.915
LIABILITIES	_	_	_	_	_	605.322	605.322
Due to central banks	39.816	503	_	-	881	320.443	361.643
Due to credit institutions	75	25		_	1	26.786	26.887
Derivative financial instruments	1.852.118	274.417	11.185	1.755	18.969	5.044.378	7.202.822
Due to customers	1,002.110	4,4.41,		-		1.225	1.225
Current tax liabilities				_	-	2.046	2.046
Deferred tax liabilities	1.902	163	_	24	150	92,415	94.654
Other liabilities	1.893.911	275.108	11.185	1.779	20.001	6.092.615	8.294.599
Total liabilities	1.095.911	273.100	11.103	1.772	20.004	0.002.000	
Equity	(18.152)	(13)	_	-		654.481	636.316
Net on balance sheet position	(637.818)	112.584	1.183	24	(10.518)	534.545	_
Derivative forward foreign exchange position	637.827	(112.584)	(1.183)	(24)	10.522	(534.558)	-
Total foreign exchange position	9		*		4	(13)	-
Total totalia evenance bosinon							

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.2 Market risk (continued)

Foreign exchange risk (continued)

			31 (December :	2021		
	USD	GBP	CHF	RUB	Other	Euro	Total
	€′000	€′000	€′000	€′000	€′000	€′000	€′000
ASSETS							
Cash and balances with central banks	732	465	10		2	2.842.542	2.843.751
Due from credit institutions	312.328	4.901	1.250	36.540	12.989	1.258.790	1.626.798
Derivative financial instruments	654	1	-	1	-	17.883	18,539
Loans and advances to customers	308.531	361.262	9.654	-	5.448	1.915.655	2,600,550
Investment securities	296.740	-	_	_	_	720.198	1.016.938
Investments in subsidiaries	-	-	_	_	_	10	10
Property and equipment	107	-	-		_	27,621	27.728
Intangible assets	_	_	_	-	-	18.851	18.851
Deferred tax assets	-	-	-	_	_	1.779	1.779
Other assets	24	1	_	14	-	1.883	1,922
Total assets	919.116	366.630	10.914	36.555	18.439	6.805.212	8.156.866
LIABILITIES							
Due to central banks						607.747	
Due to credit institutions	12,473	-	-	_	258	607.747	607.747
Derivative financial instruments	37	21	1	-		255.734	268.465
Due to customers	1.994.932	249.084	14.344	1 36.505	1 700	9.204	9.265
Current tax liabilities	1.554.552	249.064		30.505	13.702	4.311.073	6.619.640
Deferred tax liabilities	-	-	*	-	-	2.424	2.424
Other liabilities	1.717	108	-	-	446	363	363
Total liabilities	2.009.159			11	146	75.507	77.489
Total nabilities	2.009.159	249.213	14.345	36.517	14.107	5.262.052	7.585.393
Equity	(1.238)	-			(15)	572.726	571.473
Net on balance sheet position	(1.088.805)	117.417	(3.431)	38	4.347	970.434	•
Derivative forward foreign exchange position	1.088.800	(117.418)	3.431	(54)	(4.330)	(970.429)	-
Total foreign exchange position	(5)	(1)	-	(16)	17	5	-

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.3 Liquidity risk

The Bank is exposed to daily calls on its available cash resources due to deposits withdrawals, maturity of secured or unsecured funding (repurchase agreements and money market takings), loan drawdowns and forfeitures of guarantees, margin calls and payments on cash-settled derivatives and risk mitigation contracts. The Bank maintains cash resources to meet all of these needs. The Risk Committee sets liquidity limits to ensure that sufficient funds are available to meet such calls.

The matching and controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to the management of the Bank. It is unusual for banks to be completely matched, as transacted business is often of uncertain term and of different types. An unmatched position potentially enhances profitability, but also increases the risk of losses.

The maturities of assets and liabilities and the ability to replace, at an acceptable cost, interest bearing liabilities as they mature, are important factors in assessing the liquidity of the Bank.

Liquidity requirements to support calls under guarantees and standby letters of credit are considerably less than the amount of the commitment because past performance supports that the third parties generally do not draw funds under the agreement. The total outstanding contractual amount of commitments to extend credit does not necessarily represent future cash requirements, as many of these commitments will expire or terminate without being funded.

Liquidity Risk Management Framework

The Bank's Liquidity Risk Management Policy defines the following supervisory and control structure:

- Board Risk Committee's role is to approve all strategic liquidity risk management decisions and monitor the quantitative and qualitative aspects of liquidity risk;
- Bank's Assets and Liabilities Committee has the mandate to form and implement the liquidity
 policies and guidelines in conformity with Bank's risk appetite, and to review at least monthly the
 overall liquidity position of the Bank;
- Bank's Treasury is responsible for the implementation of the Bank's liquidity strategy and the daily management of the Bank's liquidity; and
- Bank's Market, Counterparty and Liquidity Risk Sector is responsible for measuring, monitoring and reporting the liquidity of the Bank.

The following list summarises the main reports which are produced on a periodic basis:

- Daily calculation and monitoring of the liquidity gap and daily liquidity ratio;
- The regular analysis of the Bank's liquidity buffer;
- Stress test scenarios. These scenarios evaluate the impact of a number of stress scenarios on the Bank's liquidity position;
- The regulatory report of Liquidity Coverage Ratio (LCR);
- The regulatory report of Net Stable Funding Ratio (NSFR);
- The regulatory report of Additional Liquidity Monitoring Metrics (ALMM).

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.2 Financial risk factors (continued)

4.2.3 Liquidity risk (continued)

The tables below present maturity analysis of financial assets as at 31 December 2022 and 2021, respectively, based on their contractual undiscounted cash flows. Derivative assets are reported in the liquidity analysis at current market value. Loans without contractual maturities are presented in the "less than 1 month" time bucket.

	31 December 2022				
	Less than	1-3	3 months	Over 1	
	1 month	months	to 1 year	year	Total
	€′000	€′000	€′000	€′000	€′000
Cash and balances with central banks	3.266.706	-	-	-	3.266.706
Due from credit institutions	802.276	728.157	-	-	1.530.433
Loans and advance to customers Investment securities – debt	353.086	52.340	202.637	2.549.089	3.157.152
securities	23.223	13.591	138.501	1.319.932	1.495.247
Investment securities – other equity	1.959		-	-	1.959
Derivative financial instruments	794	9	37	23.098	23.938
Other assets	553	-	-	99	652
	4.448.597	794.097	341.175	3.892.218	9.476.087
			December 2	021	
	Less than	1-3	3 months	021 Over 1	
	1 month	1-3 months	3 months to 1 year	Over 1 year	Total
	1 month €′000	1-3	3 months	Over 1	Total €′000
Cash and balances with central banks	1 month €'000 2.843.751	1-3 months €′000	3 months to 1 year	Over 1 year	
Due from credit institutions	1 month €′000	1-3 months	3 months to 1 year	Over 1 year €′000	€′000
	1 month €'000 2.843.751	1-3 months €′000	3 months to 1 year	Over 1 year €′000	€′000 2.843.751
Due from credit institutions Loans and advance to customers	1 month €′000 2.843.751 1.554.065	1-3 months €′000 - 71.304	3 months to 1 year €'000	Over 1 year €′000	€′000 2.843.751 1.625.369
Due from credit institutions Loans and advance to customers Investment securities – debt securities Investment securities – other equity	1 month	1-3 months €′000 - 71.304 60.326	3 months to 1 year €'000 - - 240.637	Over 1 year €′000 - 2.321.886	€'000 2.843.751 1.625.369 2.975.862
Due from credit institutions Loans and advance to customers Investment securities – debt securities	1 month €'000 2.843.751 1.554.065 353.013 21.276	1-3 months €′000 - 71.304 60.326	3 months to 1 year €'000 - - 240.637	Over 1 year €′000 - 2.321.886	€'000 2.843.751 1.625.369 2.975.862 1.077.333
Due from credit institutions Loans and advance to customers Investment securities – debt securities Investment securities – other equity	1 month €'000 2.843.751 1.554.065 353.013 21.276 1.995	1-3 months €′000 - 71.304 60.326	3 months to 1 year €'000 - 240.637 150.644	Over 1 year €′000 - - 2.321.886 904.793	€'000 2.843.751 1.625.369 2.975.862 1.077.333 1.995
Due from credit institutions Loans and advance to customers Investment securities – debt securities Investment securities – other equity Derivative financial instruments	1 month €'000 2.843.751 1.554.065 353.013 21.276 1.995 18.393	1-3 months €′000 - 71.304 60.326	3 months to 1 year €'000 - 240.637 150.644	Over 1 year €′000 - 2.321.886 904.793 - 133	€'000 2.843.751 1.625.369 2.975.862 1.077.333 1.995 18.539

The above assets are used from a liquidity management perspective to manage liquidity risk arising from the contractual maturity analysis of financial liabilities as disclosed in the following tables.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.3 Liquidity risk (continued)

The next tables analyse the cash flows payable by the Bank under derivative and non-derivative financial liabilities and off-balance sheet items into relevant maturity groupings based on the remaining period at the balance sheet date. The amounts disclosed in the table are the contractual undiscounted cash flows. Liabilities from derivatives are reported using current market values. Liabilities without contractual maturities (sight and saving deposits) are presented in the "less than 1 month" time bucket.

		31	December 20	22	
	Less than 1 month €'000	1 – 3 months €′000	3 months to 1 year €'000	Over 1 year €'000	Total €′000
Financial liabilities	0 000				
Non-derivative liabilities:					
- Due to central banks	246.236	-	298.084	65.997	610.317
- Due to credit institutions	283.463	33.515	902	47.277	365.157
- Due to customers	6.184.177	511.049	514.169	1	7.209.396
- Lease liabilities	203	412	1.889	17.737	20.241
- Other liabilities	63.736	1.227	2.553	_	67.516
	6.777.815	546.203	817.597	131.012	8.272.627
Derivative financial instruments:	23.141	1.662	-	2.084	26.887
			31	December 20	022
			Less than	Over 1	
			1 year	year	Total
			€′000	€′000	€,000
Off-balance sheet items					
Financial guarantee contracts and c	ther credit re	lated			
commitments			206.974	-	206.974
Loan commitments			445.897	=	445.897
Capital expenditure			2.728	150	2.878
			655.599	150	655.749

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)
- 4.2.3 Liquidity risk (continued)

	31 December 2021				
	Less than	1-3	3 months	Over 1	
	1 month	months	to 1 year	year	Total
	€′000	€′000	€′000	€′000	€′000
Financial liabilities					
Non-derivative liabilities:					
- Due to central banks	-	-	_	599.699	599.699
 Due to credit institutions 	216.931	22.307	13.272	16.566	269.076
- Due to customers	5.782.626	266.862	569.694	1.325	6.620.507
- Lease liabilities	199	403	1.851	17.837	20.290
- Other liabilities	50.223	1.117	1.994	-	53.334
	6.049.979	290.689	586.811	635.427	7.562.906
Derivative financial instruments:	2.192	790	_	6.283	9.265
				December 20)21
			Less than	Over 1	
			1 year	year	Total
0.00			€′000	€′000	€′000
Off-balance sheet items					
Financial guarantee contracts and o	ther credit rel	ated			
commitments			166.781	-	166.781
Loan commitments			540.445	-	540.445
Capital expenditure		_	5.186	150	5.336
		_	712,412	150	712.562

With regards to derivatives, the current market value (allocated per time bucket) is presented as a good proxy of the expected outflow.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.3 Liquidity risk (continued)

It should be noted that the above table represents the worst-case scenario since it is based on the assumption that all liabilities will be paid earlier than expected (all sight deposits are withdrawn overnight and all term deposits are withdrawn at their contractual maturity). Historical experience shows that even in a period of a systemic financial crisis the likelihood of such an event is remote.

The Bank holds a diversified portfolio of cash and high liquid assets to support payment obligations and contingent deposit withdrawals in a stressed market environment. The Bank's assets held for managing liquidity risk comprise:

- a) Cash and balances with central banks in excess of Mandatory Reserve Requirement (2022: €3.193.675 thousand vs 2021: €2.782.021 thousand);
- b) Eligible bonds and other financial assets for collateral purposes (2022: €1.912.751 thousand vs 2021: €1.647.825 thousand); and
- c) Current accounts with credit institutions and interbank placings maturing within one month (2022: €36.253 thousand vs 2021: €110.060 thousand).

The Bank's liquidity buffers are well above the minimum regulatory requirements and allow the Bank to meet business as usual needs as well as to absorb any unexpected liquidity shocks.

4.2.4 Operational risk

The Bank has adopted the Eurobank Group OpRisk Framework, which defines operational risk as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. It thus includes any unexpected or adverse impacts upon the Bank arising from any aspect of its business which is not directly attributable to any of the other risk types defined under the Framework.

The Board of Directors monitors through the Risk Committee the operational risk level and profile including the level of operational losses, their frequency and severity, and through the Audit Committee, the status of operational risk-related control issues. The Risk Management Unit sponsors any operational risk related initiative and ensures implementation of the operational risk policy.

The Bank is exposed to a variety of operational risks, such as internal and external fraud, transaction execution errors, system failures, catastrophes, third party risk, risk of losses due to damage of physical assets and risks arising from improper use of products or business practices.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.2 Financial risk factors (continued)

4.2.4 Operational risk (continued)

The prime responsibility for operational risk management lies with the respective heads of each business unit. To this end, every business unit:

- Identifies, evaluates and monitors its operational risks and implements risk mitigation techniques;
- Assesses control efficiency;
- · Reports all relevant issues; and
- Has access to and uses the common methods and tools introduced by Operational Risk Sector, in order to facilitate identification, evaluation and monitoring of operational risk.

The OpRisk Framework is built on principles, governance & organisation, processes and infrastructure.

The Bank has in place systems and procedures for monitoring and managing operational risk events which are reported to the Risk Management Unit through the Incident Report, describing the particular event that took place, the underlying root cause(s), the associated product/service, the business process during which it occurred, any remediation activity that has been undertaken and the gross actual loss, potential loss or gain that resulted due to the event's occurrence. Near misses as well as operational risk events with a timing impact are also reported.

Overall, the Operational Risk management framework functioned in an efficient way mitigating any impact from operational risks during 2022.

4.2.5 Interest Rate Benchmark reform - IBOR

During 2022, the Bank's IBOR transition program managed successfully the transition of IBOR rates that ceased after 31 December 2021 (CHF, GBP, JPY, 1W and 2M USD and EUR Libor) to the new risk-free rates (RFRs).

In particular, the Bank's financial instruments, referencing the abovementioned IBOR rates, have transitioned to the new RFRs on their first repricing date within 2022 for loan and deposit contracts and through the activation of fallback clauses for derivatives. Currently, the Bank focuses on the exposures referencing the remaining USD LIBOR tenors ahead of 30 June 2023 scheduled cessation date.

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.3 Financial assets pledged as collateral

The Bank may sell or re-pledge any securities obtained through reverse repurchase agreements and has an obligation to return the securities. The counterparty retains substantially all the risks and rewards of ownership and therefore the securities are not recognised by the Bank. As at 31 December 2022, the Bank had obtained through reverse repurchase agreements securities of face value of €1.739.664 thousand and fair value €1.626.191 thousand (2021: €1.571.023 thousand and €1.621.281 thousand). None of these securities have been lent out through securities lending agreements as at 31 December 2022 (2021: €102.690 thousand and €104.082 thousand).

As at 31 December 2022, the cash value of the assets transferred by the Bank through repurchase agreements amounted to nil (2021: €30 million).

4.4 Capital management

The primary objectives of the Bank's capital management are to ensure that the Bank complies with externally imposed capital requirements and that the Bank maintains strong credit ratings and healthy capital ratios in order to support its business and to maximise shareholders' value.

The Bank manages its capital structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristics of its activities. In order to maintain or adjust the capital structure, the Bank may adjust the amount of dividend payment to shareholders, return capital to shareholders or issue capital securities. No changes were made in the objectives, processes and policies from previous years.

The Bank has complied with all externally imposed capital requirements throughout the current and prior year.

The Bank's Capital Adequacy position is presented in the following table:

	2022 €′000	2021 €′000
Ordinary shareholders' equity	636.316 (27.657)	571.473 (18.828)
Less: other regulatory adjustments Total Tier 1 capital Total regulatory capital	608.659 608.659	552.645 552.645
Risk Weighted Assets	2.232.749	2.176.405
Ratios: Core Tier 1	% 27,3	% 25,4
Tier 1 Capital Adequacy Ratio	27,3 27,3	25,4 25,4

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.4 Capital management (continued)

In response to the Covid-19 outbreak, on 12 March 2020, the ECB announced a number of measures to ensure that its directly supervised institutions can continue to fulfil their role in funding the real economy (note 2). Specifically, banks are allowed, among others, to operate below the level of capital defined by the Pillar II Guidance and the Capital Conservation Buffer. Banks are also allowed to partially use capital instruments that do not qualify as CET1 capital (i.e. Additional Tier 1 or Tier 2 instruments) to meet the Pillar II Requirement (P2R). On 10 February 2022, the ECB announced that it will not allow banks to operate below the level of capital defined by their Pillar 2 Guidance beyond December 2022.

Based on Council Regulation No 1024/2013, the ECB conducts annually a Supervisory Review and Evaluation Process ("SREP") in order to define the prudential requirements of the institutions under its supervision. The key purpose of the SREP is to ensure that institutions have adequate arrangements, strategies, processes and mechanisms as well as capital and liquidity to ensure a sound management and coverage of their risks, to which they are or might be exposed, including those revealed by stress testing and risks the institution may pose to the financial system. According to the 2022 SREP decision, for the year ended 31 December 2021, the Bank was required to meet on an individual basis a Total SREP Capital Requirement (TSCR) of at least 10,25% (consisting of the minimum requirement of 8% for Pillar 1 risks and a Pillar 2 requirement of 2,25%) and an Overall Capital Requirement (OCR) of at least 13,485% (consisting of the TSCR plus the Capital Conservation Buffer of 2,5%, the Other Systemically Important Institutions Buffer of 0,625% and the institution-specific Countercyclical buffer of 0,11%). Moreover, based on the SREP decision, the ECB expects the Bank to adhere to a Pillar 2 guidance of 1,5%, which is over and above the OCR, bringing the total OCR and Pillar 2 guidance to 14,985%.

The Bank maintains an actively managed capital base to cover risks inherent in the business. The adequacy of the Bank's capital is monitored using among other measures, the rules and ratios established by the Basel Committee on Banking Supervision and adopted by the European Union and the Central Bank of Cyprus.

Leverage

The regulatory framework has introduced the leverage ratio as a non-risk based measure which is intended to restrict the build-up of excessive leverage from on and off balance sheet items in the banking sector. The leverage ratio is defined as Tier 1 capital divided by the total exposure measure and is a binding requirement at the beginning of 2018. The Bank submits to the regulatory authorities the leverage ratio on quarterly basis and monitors the level and the factors that affect the ratio.

The level of the leverage ratio with reference date 31 December 2022 amounts to 7,2% (2021: 7,1%), according to the transitional definition of Tier 1 capital, which is significantly over the 3% minimum threshold applied by the competent authorities.

The Pillar III Disclosures Report (unaudited) of the Bank with respect to the requirements of the Capital Requirements Regulation (EU) No 575/2013 as amended by CRR II applicable as at the reporting date, is published on the Bank's website www.eurobank.com.cy.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.4 Capital management (continued)

Minimum Requirements for Eligible Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (BRRD or Bank Recovery and Resolution Directive), as amended by Directive 2019/879 (BRRD2), European banks are required to meet the minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board (SRB) has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes. The Bank is assessed by the SRB as a Material Legal Entity of the resolution Group.

Based on the latest official SRB's decision in November 2022, the Bank needs to comply with MREL on an individual basis at the level of 22,73% plus the fully loaded CBR of 3,820% by 1 January 2024. The SRB allows for a transition period of the MREL requirement. The interim binding MREL target applicable since 1 January 2022 is set at 22,09% plus a CBR of 3,235%. The final MREL target is updated by the SRB on an annual basis. The MREL target must be met at all times.

Due to the phasing in of the MREL target, in an effort to be pro-active, the Bank's management has decided (for internal monitoring purposes) to meet the MREL target 1-day forward. So as at 31 December 2022 the Bank assessed actual MREL against the target to be met as of 1 January 2023, which stood at 25,77% (inclusive of a CBR of 3,36%).

The MREL Ratio is calculated as (Own Funds + Eligible Liabilities) / Risk Weighted Assets (RWAs). In May 2022, the Bank issued MREL Eligible Liabilities (which count in the numerator of the MREL ratio) to the parent entity, which is the Group's Resolution Entity, for an amount of €30 million with a 3NC2Y maturity. The MREL ratio stood at 28,60% as at 31 December 2022, which is above the regulatory minimum of 25,77%.

4.5 Fair value of financial assets and liabilities

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants in the principal (or most advantageous) market at the measurement date under current market conditions (i.e. an exit price). When a quoted price for an identical asset or liability is not observable, fair value is measured using another valuation technique that is appropriate in the circumstances, and maximises the use of relevant observable inputs and minimises the use of unobservable inputs. Observable inputs are developed using market data, such as publicly available information about actual events or transactions, and reflect assumptions that market participants would use when pricing financial instruments, such as quoted prices in active markets for similar instruments, interest rates and yield curves, implied volatilities and credit spreads.

The values derived using these techniques are affected by underlying assumptions concerning both the amounts and timing of future cash flows and the discount rate used.

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.5 Fair value of financial assets and liabilities (continued)

The Bank's financial instruments carried at fair value or at amortised cost for which fair value is disclosed are categorised into the three fair value hierarchy levels based on whether the inputs to their fair values are observable or non-observable, as follows:

- a) Level 1 Financial instruments measured based on quoted prices (unadjusted) in active markets for identical financial instruments that the Bank can access at the measurement date. A market is considered active when quoted prices must be readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency and represent actually and regularly occurring transactions. Level 1 financial instruments include actively quoted debt instruments, equity and derivative instruments traded on exchanges, as well as mutual funds that have regularly and frequently published quotes.
- b) Level 2 Financial instruments measured using valuation techniques where inputs, other than level 1 quoted prices, that are observable either directly or indirectly, such as: i) quoted prices for similar financial instruments in active markets, ii) quoted prices for identical or similar financial instruments in markets that are not active, iii) inputs other than quoted prices that are directly or indirectly observable, mainly interest rates and yield curves observable at commonly quoted intervals, forward exchange rates, equity prices, credit spreads and implied volatilities obtained from internationally recognised market data providers and iv) other unobservable inputs which are insignificant to the entire fair value measurement. Level 2 financial instruments include overthe-counter (OTC) derivatives, equity instruments and less liquid debt instruments.
- c) Level 3 Financial instruments measured using valuation techniques with significant unobservable inputs. When developing unobservable inputs, best information available is used, including own data, while at the same time market participants' assumptions are reflected (e.g. assumptions about risk). Level 3 financial instruments include unquoted equities or equities traded in markets that are not considered active, certain OTC derivatives and loans and advances to customers.

Financial instruments carried at fair value

The fair value hierarchy categorisation of the financial assets and liabilities carried at fair value as at 31 December 2022 and 2021 is presented in the following tables:

	At 31	December 20	022
Financial assets measured at fair value on a recurring basis:	Level 1 €'000	Level 2 €'000	Total €'000
Derivative financial instruments designated as fair value hedges	-	21.454	21.454
Derivatives for which hedge accounting is not applied/held for trading	-	2,484	2.484
Investment securities at FVOCI	393.041	101.449	494.490
Investment securities mandatorily at FVTPL	1.959	-	1.959
Total financial assets measured at fair value on a recurring basis	395.000	125.387	520.387
Financial liabilities measured at fair value on a recurring basis:			
Derivative financial instruments designated as fair value hedges	~	93	93
Derivatives for which hedge accounting is not applied/held for trading	-	26.794	26.794
Total financial liabilities measured at fair value on a recurring basis	-	26.887	26.887

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.5 Fair value of financial assets and liabilities (continued)

	At 31 [December 20	21
	Level 1	Level 2	Total
	€′000	€′000	€′000
Financial assets measured at fair value on a recurring basis:			
Derivatives for which hedge accounting is not applied/held for trading	-	18.539	18.539
Investment securities at FVOCI	515.601	40.128	555.729
Investment securities mandatorily at FVTPL	1.995	-	1.995
Total financial assets measured at fair value on a recurring basis	517.596	58.667	576.263
Financial liabilities measured at fair value on a recurring basis:			
Derivative financial instruments designated as fair value hedges	-	6.187	6.187
Derivatives for which hedge accounting is not applied/held for trading	-	3.078	3.078
Total financial liabilities measured at fair value on a recurring basis	-	9.265	9.265

The movement in financial assets carried at fair value in 2021 is presented in the following table:

	31 D	31 December 2021		
	Loans and			
	advances to	Investment		
	customers	securities		
	mandatorily	mandatorily		
	at FVTPL	at FVTPL	Total	
	€′000	€′000	€,000	
Balance at 1 January	7.540	12	7.552	
Repayments	(8.382)	-	(8.382)	
Interest income	887		887	
Losses on changes in fair value	(45)	(12)	(57)	
Balance at 31 December	_	-	-	

In measuring loans and advances to customers categorised as Level 3 in the fair value hierarchy, the Bank uses the income approach that is a present value technique. The income approach converts future amounts of contractual cash flow to present value by using a non-credit risk adjusted discount rate, which is built up of the following components: Risk-free interest rate, Funding costs spread, Minimum Equity Requirements costs, Loans' servicing costs and Loans' fees and commissions income. As at 31 December 2022 and 2021 no such loans and advances to customers were held.

Changes in fair values are recognised as gains or losses in the income statement and included in "net gains from other financial instruments". Interest income is included in "other interest income" in the income statement.

All gains or losses arising from changes in fair values are unrealised.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.5 Fair value of financial assets and liabilities (continued)

Valuation processes and techniques

The Bank's processes and procedures governing the fair valuations are established by the Group Market Counterparty Risk Sector in line with the Group's accounting policies. The Bank uses widely recognised valuation models for determining the fair value of common financial instruments that are not quoted in an active market, such as interest and cross currency swaps, that use only observable market data and require little management estimation and judgment. Specifically, observable prices or model inputs are usually available in the market for listed debt and equity securities, exchange-traded and simple over-the-counter derivatives. Availability of observable market prices and model inputs reduces the need for management judgment and estimation and also reduces the uncertainty associated with determining fair values.

Where valuation techniques are used to determine the fair values of financial instruments that are not quoted in an active market, they are validated against historical data and, where possible, against current or recent observed transactions in different instruments, and periodically reviewed by qualified personnel independent of the personnel that created them.

All models are certified before they are used and models are calibrated to ensure that outputs reflect actual data and comparative market prices. Fair values' estimates obtained from models are adjusted for any other factors, such as liquidity risk or model uncertainties, to the extent that market participants would take them into account in pricing the instrument. Fair values also reflect the credit risk of the instrument and include adjustments to take account of the credit risk of the Bank entity and the counterparty, where appropriate.

Valuation controls applied by the Bank may include verification of observable pricing, re-performance of model valuations, review and approval process for new models and/or changes to models, calibration and back-testing against observable market transactions, where available, analysis of significant valuation movements, etc. Where third parties' valuations are used for fair value measurement, these are reviewed in order to ensure compliance with the requirements of IFRS 13.

OTC derivative financial instruments are fair valued by discounting expected cash flows using market interest rates at the measurement date. Counterparty credit risk adjustments and own credit risk adjustments are applied to OTC derivatives, where appropriate. Bilateral credit risk adjustments consider the expected cash flows between the Bank and its counterparties under the relevant terms of the derivative instruments and the effect of the credit risk on the valuation of these cash flows. As appropriate in circumstances, the Bank considers also the effect of any credit risk mitigating arrangements, including collateral agreements and master netting agreements on the calculation of credit risk valuation adjustments (CVAs). CVA calculation uses probabilities of default (PDs) based on observable market data as credit default swaps (CDS) spreads, where appropriate, or based on internal rating models. The Bank applies similar methodology for the calculation of debit-value-adjustments (DVAs), when applicable. Where valuation techniques are based on internal rating models and the relevant CVA is significant to the entire fair value measurement, such derivative instruments are categorised as Level 3 in the fair value hierarchy.

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.5 Fair value of financial assets and liabilities (continued)

Valuation processes and techniques (continued)

The Bank determines fair values for debt securities held using quoted market prices in active markets for securities with similar credit risk, maturity and yield, quoted market prices in non-active markets for identical or similar financial instruments, or using discounted cash flows method.

Unquoted equity instruments at FVTPL are estimated mainly (i) using third parties' valuation reports based on investees' net assets, where management does not perform any further significant adjustments, and (ii) net assets' valuations, adjusted where considered necessary.

Loans and advances to customers which contractual cash flows do not represent solely payments of principal and interest (SPPI) failures are measured mandatorily at fair value through profit or loss. Quoted market prices are not available as there are no active markets where these instruments are traded. Their fair values are estimated on an individual loan basis by discounting the future expected cash flows over the time period they are expected to be recovered, using an appropriate discount rate. Expected cash flows which incorporate credit risk represent significant unobservable input in the valuation and as such the entire fair value measurement is categorised as Level 3 in the fair value hierarchy.

The effect of Covid-19 pandemic to the credit spreads and market yields that increased significantly in March 2020 was quickly reversed due to the swift and large response of the global central banks.

Financial instruments not carried at fair value

The fair value hierarchy categorisation of the Bank's financial assets and liabilities not carried at fair value on the balance sheet is presented in the following tables:

	At 31 December 2022				
	Level 1 €′000	Level 2 €'000	Level 3 €000	Fair Value €000	Carrying amount €'000
Financial assets not carried at fair value	e:				
Balances with central banks	-	3.258.922	-	3.258.922	3.258.922
Due from credit institutions	-	1.526.920	-	1.526.920	1.526.920
Loans and advances to customers	-	-	2.755.580	2.755.580	2.729.918
Investment securities at AC	457.759	348.283	-	806.042	828.234
Other assets	-	652	-	652	652
	457.759	5.134.777	2.755.580	8.348.116	8.344.646
Financial liabilities not carried at fair va	alue:				
Due to credit institutions	-	361.643	-	361.643	361.643
Due to customers	-	7.202.822	-	7.202.822	7.202.822
Other liabilities	*	86.400	-	86.400	86.400
	-	7.650.865	-	7.650.865	7.650.865
	1				

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.5 Fair value of financial assets and liabilities (continued)

Financial instruments not carried at fair value (continued)

At 31 December 20	021
-------------------	-----

	Level 1 €'000	Level 2 €′000	Level 3 €000	Fair Value €000	Carrying amount €′000
Financial assets not carried at fair value:					
Balances with central banks	-	2.826.774	-	2.826,774	2.826.774
Due from credit institutions	-	1.626.798	*	1.626.798	1.626.798
Loans and advances to customers	-	-	2.606.722	2.606.722	2.600.550
Investment securities at AC	371.767	106.159	-	477.926	459.214
Other assets	_	405	-	405	405
	371.767	4.560.136	2.606.722	7.538.625	7.513.741
Financial liabilities not carried at fair value Due to credit institutions Due to customers Other liabilities		268.465 6.619.640 72.105 6.960.210	- - -	268.465 6.619.640 72.105 6.960.210	268.465 6.619.640 72.105 6.960.210

The assumptions and methodologies underlying the calculation of fair values of financial instruments not carried at fair value are in line with those used to calculate the fair values for financial instruments carried at fair value. Particularly:

- Loans and advances to customers: for loans and advances to customers quoted market prices are not available as there are no active markets where these instruments are traded. The fair values are estimated by discounting future expected cash flows over the time period they are expected to be recovered, using appropriate risk-adjusted rates. Loans are grouped into homogenous assets with similar characteristics, as monitored by Management, such as product, borrower type and delinquency status, in order to improve the accuracy of the estimated valuation outputs. In estimating future cash flows, the Bank makes assumptions on expected prepayments, product spreads and timing of collateral realisation. The discount rates incorporate inputs for expected credit losses and interest rates, as appropriate;
- Investment securities carried at amortised cost: the fair values of financial investments are
 determined using prices quoted in an active market when these are available. In other cases, fair
 values are determined using quoted market prices for securities with similar credit risk, maturity
 and yield, quoted market prices in non-active markets for identical or similar financial instruments,
 or by using the discounted cash flows method.

The Bank recognises transfers into and out of the fair value hierarchy levels at the beginning of the quarter in which a financial instrument's transfer was effected. During the years ended 31 December 2022 and 2021, the Bank did not make any transfers into and out of the fair value hierarchy levels.

For other financial instruments which are short term or re-price at frequent intervals (cash and balances with central banks, due from credit institutions, due to central banks, due to credit institutions and due to customers), the carrying amounts represent reasonable approximations of fair values.

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.6 Fiduciary activities

Assets and income arising thereon together with related undertakings to return such assets to customers are excluded from these financial statements where the Bank acts in a fiduciary capacity such as nominee, trustee or agent.

4.7 Offsetting of financial assets and financial liabilities

The disclosures set out in the tables below include financial assets and financial liabilities that:

- are offset in the Bank's balance sheet according to IAS 32 'Financial Instruments: Presentation' criteria; or
- are subject to enforceable master netting arrangements or similar agreements that cover similar financial instruments, irrespective of whether they are offset in balance sheet.

Regarding the former, financial assets and financial liabilities are offset and the net amount is reported in the balance sheet when, there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously (the offset criteria), as also set out in the Bank's accounting policy 2.2.3.

Regarding the latter, the International Swaps and Derivatives Association ('ISDA') and similar master netting arrangements do not meet the criteria for offsetting in the balance sheet, as they create a right of set-off that is enforceable only following an event of default, insolvency or bankruptcy of the Bank or the counterparties or following other predetermined events. In addition, the Bank and its counterparties may not intend to settle on a net basis or to realise the assets and settle the liabilities simultaneously.

Similar agreements to ISDA include derivative clearing agreements, global master repurchase agreements and global master securities lending agreements. Similar financial instruments include derivatives, repos and reverse repos agreements and securities borrowing and lending agreements. Financial instruments such as loans and deposits are not subject to this disclosure unless they are offset in the balance sheet.

The following tables present financial assets and financial liabilities that meet the criteria for offsetting and thus are reported on a net basis in the balance sheet, as well as amounts that are subject to enforceable master netting arrangements and similar agreements for which the offset criteria mentioned above are not satisfied. The latter amounts, which mainly relate to derivatives, repurchase agreements and reverse repurchase agreements, are not set off in the balance sheet.

In respect of these transactions, the Bank receives and provides collateral in the form of marketable securities and cash that are included in the tables below under columns "financial instruments" and "cash collateral" at their fair value.

Notes to the financial statements

4 Financial risk management and fair value (continued)

4.7 Offsetting of financial assets and financial liabilities (continued)

Financial assets and liabilities are disclosed in the below tables at their recognised amounts which are at amortised cost, except for derivative financial instruments which are measured at fair value and placements with credit institutions mandatorily at FVTPL.

The amount set off in the balance sheet reported in column (b) is the lower of (i) the gross amount before offsetting reported in column (a) and (ii) the amount of the related instrument that is eligible for offsetting. Similarly, the amounts in columns (d) and (e) are limited to the exposure reported in column (c) for each individual instrument in order not to understate the ultimate net exposure.

Financial instruments subject to offsetting, enforceable master netting and similar arrangements are as follows at 31 December 2022 and 31 December 2021:

31 December 2022

	Gross amounts	Gross		Amounts subject to maste netting and simila arrangements not offset in the balance shee Financial		
	before offsetting in the balance sheet (a) €000	amounts offset in the balance sheet (b) €000	Net amounts after offsetting in the balance sheet (c) = (a) - (b) €000	instruments including non- cash collaterals (d) €000	Cash collateral received/ pledged (e) €000	Net amount (c) – (d) – (e) €000
Assets						
Placements with credit institutions Settlement balances with credit	1.423	~	1.423	-	1.423	-
institutions Loans and advances to customers Reverse repurchase agreements	4.260 9.074	9.054	4.260 20	-	4.260	20
receivables Derivative financial instruments	1.490.836 23.801	-	1.490.836 23.801	1.490.836	23.801	- -
Total assets subject to offsetting, master netting and similar arrangement	1.529.394	9.054	1.520.340	1.490.836	29.484	20
Liabilities						
Deposits from credit institutions Settlement balances with credit	8.195	-	8.195	-	4.204	3.991
institutions	74.079	-	74.07 9	-	-	74.079
Due to customers	9.054	9.054	-	-	-	-
Derivative financial instruments	25.280	-	25.280	-	25.280	•
Total liabilities subject to offsetting, master netting and similar						**
arrangement	116.608	9.054	107.554	<u>.</u>	29.484	78.070

Notes to the financial statements

- 4 Financial risk management and fair value (continued)
- 4.7 Offsetting of financial assets and financial liabilities (continued)

31 December 2021

	Gross amounts before offsetting in the balance sheet (a) €000	Gross amounts offset in the balance sheet (b) €000	Net amounts after offsetting in the balance sheet (c) = (a) - (b) €000	arrangements r	and similar	Net amount {c} – {d} – (e) €000
Assets						
Placements with credit institutions Settlement balances with credit	1.330	ü	1.330	-	1.330	-
institutions	12.423	-	12.423	-	12.423	=
Loans and advances to customers	13.257	13.206	51	-	+	51
Reverse repurchase agreements			4 545 435	4 645 475		_
receivables	1.515.435	-	1.515.435 18.353	1.515.435	18.353	-
Derivative financial instruments	18.353		10,353		10.000	
Total assets subject to offsetting, master netting and similar arrangement	1.560.798	13.206	1.547.592	1.515.435	32.106	51
Liabilities						
Deposits from credit institutions Settlement balances with credit	19.327	-	19.327	-	19.327	-
institutions	29.085	-	29.085	-	3.515	25.570
Due to customers	13.206	13.206	-	-	-	-
Derivative financial instruments	9.264	-	9.264	-	9.264	-
Total liabilities subject to offsetting, master netting and similar arrangement	70.882	13.206	57.676	-	32.106	25.570

The gross amounts of financial assets and financial liabilities and their net amounts disclosed in the above tables have been measured in the Balance Sheet on the following bases:

- assets and liabilities with credit institutions: amortised cost;
- loans and advances to customers: amortised cost;
- reverse repurchase agreements receivables; amortised cost;
- derivative financial instruments: fair value; and
- due to customers: amortised cost.

Notes to the financial statements

Financial risk management and fair value (continued) 4

4.7 Offsetting of financial assets and financial liabilities (continued)

The tables below show a reconciliation of the net amounts of financial assets and financial liabilities presented in the balance sheet:

		31 December 2	022		
Times of firm violance by	Net amounts €′000	Line item in the balance sheet	Carrying amount in the balance sheet €'000	Financial assets/ Ilabilities not in scope of offsetting disclosures €'000	Note
Types of financial assets:					
Placements with credit institutions	1.423	Due from credit institutions	7.048	5.625	14
Settlement balances with credit institutions	4.260	Due from credit institutions	29.036	24.776	14
Loans and advances to customers	20	Loans and advances to customers	2.729.918	2.729.898	16
Reverse repurchase agreements receivables	1.490.836	Due from credit institutions	1.490.836		14
Derivative financial instruments	23.801	Derivative financial instruments	23.938	137	15
Types of financial liabilities:					
Deposits from credit institutions	8.194	Due to credit institutions	220,981	212.787	23
Settlement balances with credit institutions	74.079	Due to credit institutions	140.662	66.583	23
Due to customers	-	Due to customers	7.202.822	7.202.822	24
Derivative financial instruments	25.250	Derivative financial instruments	26.887	1.637	15
		31 December 20	021		
	Net amounts	Line item in the balance sheet	Carrying amount in the balance sheet	Financial assets/ liabilities not in scope of offsetting disclosures	Note
	€′000		€′000	€′000	7401.0
Types of financial assets:					
Placements with credit institutions	1.330	Due from credit institutions	69.101	67.771	14
Settlement balances with credit institutions	12.423	Due from credit institutions	42.262	29.839	14
Loans and advances to customers	51	Loans and advances to customers	2.600.550	2.600.499	16
Reverse repurchase agreements receivables	1.515.435	Due from credit institutions	1.515.435	_	14
Derivative financial instruments	18.353	Derivative financial instruments	18.539	186	15
Types of financial liabilities:					
Deposits from credit institutions	19.327	Due to credit institutions	196.422	177.095	23
Settlement balances with credit institutions	29.085	Due to credit institutions	72.043	42,958	23
Due to customers	-	Due to customers	6.619.640	6.619.640	24
Derivative financial instruments	9.264	Derivative financial instruments	9.265	1	15

Notes to the financial statements

5 Net interest income

	2022 €′000	2021 €'000
Interest income		
Interest income calculated using the effective interest method		
Interest from amounts due from credit institutions - measured at amortised cost	24.695	3.946
Interest from loans and advances to customers - measured at amortised cost	92.183	66.678
Interest from investment securities		
- measured at amortised cost	15.847	10.025
- measured at FVOCI	5.156	5.163
Total interest income calculated using the effective interest method	137.881	85.812
Other interest income		
Interest from derivative financial instruments - measured at FVTPL	17.886	6.577
Interest from loans and advances to customers - measured mandatorily		
at FVTPL .		104
Total other interest income	17.886	6.681
Interest expense		
Interest expense calculated using the effective interest method		2.440
Interest on due to credit institutions - measured at amortised cost ¹	(1.439)	3.419
Interest on due to customers - measured at amortised cost	(13.566)	(5.913)
Negative interest on financial assets	(6.071)	(8.227)
Interest on lease liabilities (note 28)	(261)	(262)
Other interest expense	(8)	(9)
Total interest expense calculated using the effective interest method	(21.345)	(10.992)
Other interest expense		(=0.0)
Interest on derivative financial instruments - measured at FVTPL	(7.142)	(796)
Total other interest expense	(7.142)	(796)
Net interest income	127.280	80.705

¹Includes the benefit attached to the TLTRO III program (note 22).

The amounts reported above include interest income and expense, calculated using the effective interest method, that relate to the following financial assets and financial liabilities:

	2022 €′000	2021 €′000
Financial assets measured at amortised cost Financial assets measured at FVOCI	8.336.580 494.489	7.506.028 555.729
Total	8.831.069	8.061.757
Financial liabilities measured at amortised cost	8.169.787	7.495.853
	****	140

Notes to the financial statements

6 Net banking fee and commission income

	2022 €′000	2021 €′000
Banking fee and commission income	€ 000	€ 000
Bank transfer commissions	11.143	9.998
Other fees and commissions	32.187	26.131
Total banking fee and commission income	43.330	36.129
Banking fee and commission expense		
Fees on lien agreements (note 32)	(2.521)	(1.521)
Other fees and commissions	(4.367)	(3.900)
Total banking fee and commission expense	(6.888)	(5.421)
Net banking fee and commission income	36.442	30.708

The following table includes net banking fees and commission income from contracts with customers in the scope of IFRS 15, disaggregated by major type of services:

	2022	2021
-	€′000	€′000
Lending related activities	2.368	2.160
Wealth management	6.051	5.231
Network and other transactional activities	34.911	28.738
Total banking fee and commission income	43.330	36.129
Fee and commission expense	(6.888)	(5.421)
Net banking fee and commission income	36.442	30.708

The Bank recognises revenue when it transfers control over a service to a customer.

The Bank earns fee income from a range of services it provides to its clients. The major categories are the below:

- Banking services including account management, granting of credit facilities, foreign currency transactions, credit card and other service fees

 Revenue from account and servicing fees is recognised over time as the services are provided (i.e.
 - Revenue from account and servicing fees is recognised over time as the services are provided (i.e. charged on a monthly basis to the customer's account). Servicing fees are based on fixed rates reviewed annually by the Bank.
 - Revenues from transaction-based fees (e.g. foreign currency transactions, overdraft facilities, etc.) are recognised (i.e. charged to the customer's account) at the point in time when the transaction takes place.
- Execution of client transactions
 Revenue from transaction-based fees is recognised at the point in time when the transaction takes place.

Notes to the financial statements

6 Net banking fee and commission income (continued)

- Wealth management services, including safekeeping of assets and asset management services
Fees from these services are calculated based on a fixed percentage of the value of assets managed
/ held and deducted from the customer's account balance on a monthly basis. The respective
revenue is recognised over time as the services are provided. Fees from wealth management
services, including safekeeping of assets and asset management services amount to €1.509
thousand (2021: €1.249 thousand).

The net fee and commission income presented above includes income of €42.988 thousand (2021: €36.070 thousand) and expense of €6.888 thousand (2021: €5.421 thousand) related to financial assets and financial liabilities not measured at FVTPL.

7 Net trading income

	2022 €′000	2021 €′000
Net gain from the ineffective portion of derivatives in qualifying hedging relationships Net gain/(loss) on derivative financial instruments (no hedge	313	78
accounting)	131	(29)
	444	49
8 Net gains from other financial instruments		
	2022	2021
	€′000	€′000
Net gains on disposal of investment securities at FVOCI:		
- Debt securities, credit institutions	(18)	57
 Debt securities, Cyprus government bonds 	88	424
 Debt securities, other financial corporations 	34	-
Net losses on revaluation of investment securities mandatorily		
at FVTPL: — Equity shares	-	(107)
- UCIT funds	(94)	(11)
Net gains on disposal of investment securities mandatorily at FVTPL	-	213
Net losses on loans and advances to customers mandatorily at FVTPL	-	(45)
Gain on fair value hedging discontinuance of investment securities		
measured at FVOCI	300_	_
Net gains from investment securities	310	531

During the years ended 31 December 2022 and 2021 the Bank did not sell any financial assets measured at amortised cost.

Notes to the financial statements

9 Staff costs

	2022	2021
	€′000	€′000
Salaries and other related costs	19.236	17.149
Social insurance and other costs	3.870	3.714
Directors' fees and remuneration (note 32)	1.286	1.203
Retirement benefit costs – defined contributions plan	1.625	1.544
	26.017	23.610

The average number of employees of the Bank during the year 2022 was 447 (2021: 433).

The Defined Contribution Plan is managed by an Administrative Committee composed of representatives of both the members and the employer.

The Bank contributes up to 10% of the gross monthly salary of the members of staff and up to 30% on an ad-hoc basis.

10 Other operating expenses

	2022	2021
	€′000	€′000
Loss on disposal/write down of property and equipment and		
intangible assets	10	25
Expenses relating to short term leases and other related maintenance		
expenses	111	110
Repairs and maintenance	4.405	3.940
Auditors' remuneration for statutory audit	155	149
Auditors' remuneration for other assurance engagements	125	53
Auditors' remuneration for non-assurance engagements	1	7
Professional fees	1.373	889
Advertising and promotion	1.257	740
Other administrative expenses	9.113	8.085
	16.550	13.998

11 Other impairment allowances and provisions

	2022	2021
	€′000	€′000
Provisions on operational risk events	140	455
(Reversal of impairment allowance)/impairment allowance on		
investment securities at FVOCI	(66)	48
Impairment allowance/(reversal of impairment allowance) on	, ,	
investment securities at AC	173	(221)
Reversal of impairment allowance on due from credit institutions	(27)	(21)
Reversal of impairment allowance on balances with central banks	(13)	(1)
Reversal of impairment allowance on securities lending	-	(619)
	207	(359)

Notes to the financial statements

12 Income tax expense

	2022 €′000	2021 €′000
Current tax:		
- Corporation tax	12.592	8.703
- Withholding tax	525	528_
Total current tax	13.117	9.231
Deferred tax charge/(credit)	1.292	(729)
Total income tax expense	14.409	8.502

The tax on the Bank's profit before tax differs from the theoretical amount that would arise using the applicable tax rate as follows:

	2022	2021
	€′000	€′000
Profit before income tax and government levies	115.737	66.731
Tax calculated at the applicable corporation tax rate of 12,5%	14.467	8.341
Tax effect of expenses not deductible for tax purposes	994	1.330
Tax effect of allowances and income not subject to tax	(2.868)	(968)
Withholding tax	525	528
Deferred tax charge/(credit)	1.291	(729)
Income tax expense	14.409	8.502

The Bank is subject to income tax on taxable profits at the rate of 12,5%.

Tax losses may be carried forward for five years.

Tax losses of group companies in Cyprus, other than companies affected by article 13(8)(d)(i) of the Income Tax Law, can be offset against taxable profits of other group companies in Cyprus and any tax losses not utilised can be carried forward and offset against the same entity's taxable profits of the next five years. Article 13(8)(d)(i) of the Income Tax Law provides that in the case where the disposal of shares held by one company in another company member of the same group is taxed as a trading transaction then the two companies are not considered group companies for loss relief purposes.

Under certain conditions interest income may be subject to defence contribution at the rate of 30%. In such cases this interest will be exempt from corporation tax.

In certain cases, dividends received from abroad may be subject to special defence contribution at the rate of 17%.

Gains on disposal of qualifying titles (including shares, bonds, debentures, rights thereon etc.) are exempt from Cyprus income tax.

There is no income tax effect relating to components of other comprehensive income (2021: €nil).

Notes to the financial statements

12 Income tax expense (continued)

The Management believes that its accruals for tax liabilities are adequate for all open tax years based on its assessment of many factors, including interpretations of tax law and prior experience.

Other taxation related matters:

Loan Restructuring Exemption - An exemption from Capital gains tax (CGT)/Income Tax/Corporate Tax/Land Registry Fees/Stamp Duties is available on all transfers of immovable property (IP) or shares of companies owning IP as a result of loan restructuring arrangements concluded between Credit Institutions and borrowers. Following an amendment to the Laws this exception has been extended and will be available until 31 December 2019. With an amendment to the Tax Laws, published in the Official Gazette on 17 July 2018, the definition of restructuring has been broadened as to include transfers/disposals of property to third persons, non-related with the borrower, following the consent of the Credit Institution. These restructuring arrangements however, will be restricted to facilities which were rendered non-performing on or prior to 31 December 2015. The restriction however was included in the general definition of restructurings and subsequently as from 17 July 2018 and until a new amendment to the provisions of the relevant Laws is effected, the tax exemptions will be applicable only to restructuring arrangements the facilities of which were rendered non-performing on or prior to 31 December 2015. With an additional amendment to the Laws the definition of Creditor has been broadened so as to include companies which acquire credit facilities pursuant to the Sale of Loans Law. Through this amendment the tax exemptions for loan restructurings will also be available for loan restructurings effected by these companies. Another amendment to the Law provisions with effect from 15 March 2019 broadens the term borrower so as to include 3rd degree related persons to the borrower. Through this amendment debt to asset restructurings may be now concluded with immovable property which is not mortgaged however is owned by the related to the borrower persons.

Deferred tax:

Deferred tax is calculated on all temporary differences under the liability method at the rate in effect at the time the reversal is expected to take place.

The movement in deferred tax assets and liabilities (non-current) is as follows:

		31 December 202	22
	Balance at 1 January €'000	Recognised in profit or loss €'000	Balance at 31 December €'000
Allowance for expected credit losses	1.779	392	2.171
Other temporary differences	(363)	(1.683)	(2.046)
Net tax assets/(liabilities)	1.416	(1.291)	125
		31 December 202	1
	Balance at	Recognised in	Balance at
	1 January	profit or loss	31 December
	€′000	€′000	€′000
Allowance for expected credit losses	1.125	654	1.779
Other temporary differences	(438)	75	(363)
Net tax assets/(liabilities)	687	729	1.416

Notes to the financial statements

13 Cash and balances with central banks

	2022 €′000	2021 €′000
Cash in hand Balances with central banks	7.784 3.258.922	16.977 2.826.774
Total	3.266.706	2.843.751
of which: Mandatory deposits with central banks	73.031	61.730

As at 31 December 2022, the impairment allowance on balances with central banks within the scope of IFRS 9 impairment requirements amounted to €nil (2021: €13 thousand).

Cash and balances with central banks are classified as current.

Mandatory deposits with central banks represent the minimum level of average monthly deposits which the Bank is required to maintain. Mandatory balances with central banks can be withdrawn at any time provided the average monthly minimum deposits are maintained.

14 Due from credit institutions

	2022	2021
	€′000	€′000
Due from credit institutions at amortised cost:		
Reverse repurchase agreements receivables ¹	1.490.836	1.515.435
Placements with credit institutions ²	7.048	69.101
Settlement balances with credit institutions	29.036	42.262
Total	1.526.920	1.626.798
		· · · · · · · · · · · · · · · · · · ·
Maturity analysis:		
Current:		
- on demand up to 7 days	34.538	1.012.319
- between 7 days and 3 months	1.492.382	614.479
•	1.526.920	1.626.798

¹The majority of the reverse repurchase agreements receivables as at 31 December 2022, approximately €1.245.373 thousand (2021: €1.253.633 thousand), are rated as Investment grade.

²Placements with credit institutions bear interest which is based on the interbank rate of the relevant term and currency.

As at 31 December 2022, the impairment allowance on amounts due from credit institutions at amortised cost within the scope of IFRS 9 impairment requirements amounted to €2 thousand (2021: €26 thousand).

Notes to the financial statements

15 Derivative financial instruments

The Bank utilises the following derivative instruments for both hedging and non-hedging purposes:

Currency forwards represent commitments to purchase or sell foreign and domestic currency.

Currency and interest rate swaps are commitments to exchange one set of cash flows for another. Swaps result in an economic exchange of currencies or interest rates (for example, fixed rate for floating rate) or a combination of all these (i.e. cross-currency interest rate swaps). Except for certain currency swaps, no exchange of principal takes place. The Bank's credit risk represents the potential cost to replace the swap contracts if counterparties fail to perform their obligation. This risk is monitored on an ongoing basis with reference to the current fair value, a proportion of the notional amount of the contracts and the liquidity of the market. To control the level of credit risk taken, the Bank assesses counterparties using the same techniques as for its lending activities, except in the cases where the counterparty is a Eurobank group entity.

Foreign currency and interest rate options are contractual agreements under which the seller (writer) grants the purchaser (holder) the right, but not the obligation, either to buy (a call option) or sell (a put option) at or by a set date or during a set period, a specific amount of a foreign currency or a financial instrument at a predetermined price. In consideration for the assumption of foreign exchange or interest rate risk, the seller receives a premium from the purchaser. Options may be either exchange-traded or negotiated between the Bank and a customer (OTC). The Bank is exposed to credit risk on purchased options only, and only to the extent of their carrying amount, which is their fair value.

The notional amounts of certain types of financial instruments provide a basis for comparison with instruments recognised on the balance sheet but do not necessarily indicate the amounts of future cash flows involved or the current fair value of the instruments and, therefore, do not indicate the Bank's exposure to credit or price risks at the reporting date. The derivative instruments become favourable (assets) or unfavourable (liabilities) as a result of fluctuations in market interest rates or foreign exchange rates relative to their terms. The aggregate contractual or notional amount of derivative financial instruments on hand, the extent to which the instruments are favourable or unfavourable and thus the aggregate fair values of derivative financial assets and liabilities can fluctuate significantly from time to time.

The fair values of derivative instruments held by product type and hedge relationship along with their notional amounts are set out in the following tables:

Notes to the financial statements

15 Derivative financial instruments (continued)

	Asset	31 Decem	Liabilitie	es
	Contract/ notional amount € '000	Fair values € '000	Contract/ notional amount € '000	Fair values €'000
Derivatives for which hedge accounting				
is not applied/held for trading				
- Currency options	497	1	500	1
 Currency forward and spot deals 	22.467	51	21.888	30
- Interest rate and currency interest rate swaps	66.896	1.219	68.302	1.634
- Currency swaps	751.789	77 9	751.789	24.746
- Cap and floor swaps	29.678	434	29.678 _	383
	***	2.484	_	26.794
Derivatives designated as fair value hedges				
- Interest rate swaps	261.364	21.454	261.364	93
	-	21.454		93
Total derivatives assets/liabilities		23.938	-	26.887
		31 Decer	mber 2021	
	Asse	ts	Liabilitie	es
	Contract/		Contract/	
	notional	Fair	notional	Fair
	amount	values	amount	values
	€ '000	€ '000	€ '000	€ '000
Derivatives for which hedge accounting				
is not applied/held for trading				
- Currency options	3.959	3	4.057	2
 Currency forward and spot deals 	8.680	57	7.645	3
 Interest rate and currency interest rate swaps 	23.397	30	22.073	75
- Currency swaps	1.232.316	18.346	1.232.316	2.976
- Cap and floor swaps	15.435	98	15.43	-
- Derivative bonds	4.338	5_	14.871	22
		18.539		3.078
Derivatives designated as fair value hedges				
- Interest rate swaps	-		91.324 _	6.187
		-	_	6.187
		<u> </u>		
Total derivatives assets/liabilities		18.539	_	9.265

Notes to the financial statements

15 Derivative financial instruments (continued)

		Fair Valu	ies	
	2	022	20:	21
	Assets	Liabilities	Assets	Liabilities
	€′000	€′000	€′000	€′000
Maturity analysis:				
Current	840	24.803	18.406	2.982
Non-current	23.098	2.084	133	6.283
	23.938	26.887	18.539	9.265

The Bank uses certain derivatives and other financial instruments, designated in a qualifying hedged relationship, to reduce its exposure to market risks. The hedging practices applied by the Bank, as well as the relevant accounting policy, are disclosed in note 2.2.2.

In particular:

Fair value hedges

The Bank hedges a proportion of its existing interest rate risk resulting from any potential change in the fair value of fixed rate debt securities held using interest rate swaps. In 2022, the Bank recognised a loss of €27.132 thousand (2021: €3.796 thousand) from changes in the carrying amount of the hedged item attributable to the hedged risk, used as the basis of recognising hedge ineffectiveness and a gain of €27.468 thousand (2021: €3.769 thousand) from changes in the carrying amount (i.e. fair value) of the hedged instrument. The amount of hedge ineffectiveness recognised for 2022 in the income statement (under net trading income) was €337 thousand gain (2021: €28 thousand loss).

The Bank establishes a hedge ratio by the comparison of the change in fair value of the hedged instrument with the change in the fair value of the hedged item (fixed rate note) attributed to the hedged risk. Under the Bank policy, the hedging relationship would be considered effective if dollar-offset ration is within the desired range 80%-125%.

In these hedging relationships, the main sources of ineffectiveness are:

- the effect of the counterparty and the Bank's own credit risk on the fair value of the interest rate swap, which is not reflected in the fair value of the hedged item attributable to the change in interest rate; and
- differences in maturities of the interest rate swap and the notes.

There were no other sources of ineffectiveness in these hedging relationships.

The effective portion of fair value gains on derivatives held in qualifying fair value hedging relationships and the hedging gain or loss on the hedged items are included in net interest income.

Notes to the financial statements

15 Derivative financial instruments (continued)

Fair value hedges (continued)

At 31 December 2022 and 2021, the amounts relating to items designated as fair value hedged items were as follows:

		31 December 2022	
	Carrying amount €'000	Accumulated amount of FV hedge adjustments on the hedged item €'000	Change in value as the basis for recognising hedge ineffectiveness €'000
Loans and advances to customers	11.834	(617)	(617)
Investment securities - Debt securities at AC Investment securities - Debt	95.966	(14.373)	(20.398)
securities at FVOCI	128.659	(6.117)	(6.117)
Total	236.459	(21.107)	(27.132)
	Carrying amount €'000	31 December 2021 Accumulated amount of FV hedge adjustments on the hedged item €'000	Change in value as the basis for recognising hedge ineffectiveness €'000
Investment securities - Debt securities at AC	96.216	6.024	(3.796)
Total	96.216	6.024	(3.796)

At 31 December 2022 and 2021, the maturity profile of the nominal amount of the financial instruments designated by the Bank in fair value hedge relationships and hedged items is presented in the tables below:

pelow:	31 December 2022		
	Maturity 1 to 5 years €'000	Maturity over 5 years €'000	Total €'000
Interest rate swap - Loans and advances to customers	10	11.871	11.871
Interest rate swap - Investment securities at AC	**	110.000	110.000
Interest rate swap - Investment securities at FVOCI	118.882	20.000	138.882
Total	118.882	141.871	260.753
		31 December 20 ty over 5	21
	111000111	years	Total
		€′000	€′000
Interest rate swap - Investment securities at AC		90.000	90.000
,			150

Notes to the financial statements

15 Derivative financial instruments (continued)

Fair value hedges (continued)

In addition, the Bank uses other derivatives, not designated in a qualifying hedge relationship, to manage its exposure primarily to interest rate and foreign currency risks. Non qualifying hedges are derivatives entered into as economic hedges of assets and liabilities for which hedge accounting was not applied. The said derivative instruments are monitored and have been classified for accounting purposes along with those held for trading.

All derivatives are under collateral agreements and they are covered by ISDA agreements with Eurobank S.A.

The Bank's exposure in derivative financial assets, as categorised by counterparty's geographical region and industry sector, is presented in note 4.2.1.5.

Information on the fair value measurement and offsetting of derivatives is provided in notes 4.5 and 4.7, respectively.

Derivative financial instruments and hedge accounting

In October 2021, the discounting curve of Euro denominated interest rate derivatives changed from EONIA curve to €STR curve, used for revaluation of derivatives in the Bank's book. The resulted change in the fair value of these instruments was offset by an equal cash compensation amount, to the Bank to offset loss from the transition. As a result, the change in the discounting curve to €STR did not impact the Bank's income statement.

16 Loans and advances to customers

Loans and advances to customers at amortised cost:	31 December 2022 €'000	31 December 2021 €'000
- Gross carrying amount	2.775.548	2.647.214
- Impairment allowance	(45.630)	(46.664)
Carrying amount	2.729.918	2.600.550
	31 December	31 December
	2022	2021
Maturity analysis:	€′000	€′000
Current	415.269	469.704
Non-current	2.314.649	2.130.846
•	2.729.918	2.600.550

Notes to the financial statements

16 Loans and advances to customers (continued)

The table below presents the carrying amount of loans and advances to customers per business unit and per stage as at 31 December 2022 and 2021:

		31 Decem	ber 2022			31 Decem	ber 2021	
	12-month ECL €000	Lifetime ECL not credit- impaired €000	Lifetime ECL credit- impaired €000	Total amount €000	12-month ECL €000	Lifetime ECL not credit- impaired €000	Lifetime ECL credit- impaired €000	Total amount €000
Retail Lending:								
- Mortgage					40.055	22	0.7	12 540
Gross carrying amount	13.881	82	97	14.060	12.358		97	12.548
Impairment allowance	(1)		-	(1)	42.250	93	97	12.548
Carrying amount	13.880	82	97	14.059	12.358	93	97	12,546
- Consumer		_	4.5	20.625	20.202	43	17	20.363
Gross carrying amount	20.582	1	42	20.625	20.303			(143)
Impairment allowance	(200)		(42)	(242)	(126)			20.220
Carrying amount	20.382	1		20.383	20.177	43	-	20.220
 Affluent banking 			20	0.5.000	F2 000	1.254	388	54,450
Gross carrying amount	84.983	995	30	86.008	52.808			(258)
Impairment allowance	(142)	(12)	(12)	(166)	(105) 52.703			54.192
Carrying amount	84.841	983	18	85.842	52.703	1.230	201	34.132
- Credit cards		25	47	905	725	19	40	784
Gross carrying amount	823	25	47	895	(3)			(44)
Impairment allowance	(6)	(1)	(41)	(48)	722			740
Carrying amount	817	24	6	847	122	. 10		7.10
Wholesale Lending:	_							
- Large corporate loans	1.284.316	212.005	52.898	1.549.219	1.267.626	197.303	40,568	1.505.497
Gross carrying amount	(3.171)	(3.197)	(26.810)	(33.178)	(3.941			(31.972)
Impairment allowance	1.281.145	208.808	26.088	1.516.041	1.263.685			1,473.525
Carrying amount		200.000	20.000	1.510.041	1.200.000			
- Wealth management	373.405	16.270	15.009	404.684	348.635	16.129	18.499	383.263
Gross carrying amount Impairment allowance	(615)		(9.186)	(10.050)	(708			(11.151)
•	372,790		5.823	394.634	347.927			372.112
Carrying amount - International business			J.023	33 1100 1				
Gross carrying amount	471.742		43	471.844	465.099) 7	1.280	466.386
Impairment allowance	4/1./42	-	(6)	(6)	,			(1.275)
Carrying amount	471.742	59	37	471.838	465.099) 7		465.111
- Shipping loans	7/1/74							
Gross carrying amount	226.380	_	1.833	228.213	202.19		1.727	203.923
Impairment allowance	(106)			(1.939)	(94	· }	- (1.727)	(1.821)
Carrying amount	226.274			226.274	202.10			202.102
Carrying amount								
Total								
Gross carrying amount	2,476.112	229.437	69.999	2.775.548	2.369.75	214.848	62.616	2.647.214
Impairment allowance	(4.241)			(45.630)	(4.977) (3.933) (37.754)	(46.664)
Carrying amount	2.471.871			2.729.918	2.364.77	3 210.915	24.862	2.600.550

In 2022 loans of €799 thousand that were written off in prior years were recovered (2021: €238 thousand).

Interest income on impaired loans and advances to customers accrued during the year amounted to €1.005 thousand (2021: €1.714 thousand).

Notes to the financial statements

17 Investment securities

	31 December 2022 €′000	31 December 2021 €'000
Investment securities at FVOCI	494.490	555.729
Investment securities at amortised cost	828.234	459.214
Investment securities mandatorily at FVTPL	1.959	1.995
	1.324.683	1.016.938
Maturity analysis:		
Current	151.511	155.556
Non-current	1.173.172	861.382
	1.324.683	1.016.938

The tables below disclose the gross carrying amount, impairment allowance and carrying amount per stage of investment securities as at 31 December 2022 and 2021:

		31 Decem Lifetime ECL not	ıber 2022	31 Decem	ber 2021
	12-month	credit-		12-month	
	ECL	impaired	Total	ECL	Total
	€′000	€′000	€′000	€′000	€′000
Debt securities at FVOCI:					
Carrying amount	490.870	3.620	494.490	555.729	555.729
Debt securities at amortised cost:					
- Gross carrying amount	828.578	•	828.578	459.385	459.385
- Impairment allowance	(344)	-	(344)	(171)	(171)
Carrying amount	828.234	-	828.234	459.214	459.214
Total of debt securities	1.319.104	3.620	1.322.724	1.014.943	1.014.943
Other investment securities man	ndatorily at				
UCIT funds			1.959		1.995
Carrying amount		•	1.959		1.995
Total of investment securities			1.324.683		1.016.938

Notes to the financial statements

17 Investment securities (continued)

The investment securities per category are analysed as follows:

	Investment securities at FVOCI €'000	31 December Investment securities at amortised cost €'000	ner 2022 Investment securities mandatorily at FVTPL €'000	Total €′000
Debt securities:				
- Cyprus government bonds	64,526	298.042	_	362.568
- Other government bonds	296.143	316.263	-	612.406
- Multilateral development banks	4.625	25.076	~	29.701
- Banks and financial institutions	85.507	16.426	w	101.933
- Other issuers	43.689	172.427	-	216.116
Total debt securities	494.490	828.234	•	1.322.724
10101 4001 3001				
Other investment securities:				
UCIT funds	-	-	1.959	1.959
Total other investment securities		-	1.959	1.959
Total of investment securities	494.490	828.234	1.959	1.324.683
		31 Decem	ber 2021 Investment	
	Investment	Investment	securities	
	securities	securities at	mandatorily	
	at FVOCI	amortised cost	at FVTPL	Total
	€′000	€′000	€′000	€′000
Debt securities:				
- Cyprus government bonds	50.816	355.478	_	406.294
- Other government bonds	337.263	-	-	337.263
- Multilateral development banks	4.622	-	-	4.622
- Banks and financial institutions	91.982	-	-	91.982
- Other issuers	71.046	103.736		174.782
Total debt securities	555.729	459.214	-	1.014.943
Other investment securities:				
UCIT funds	-	**	1.995	1.995
Total other investment securities	-	_	1.995	1.995
Total of investment securities	555.729	459.214	1.995	1.016.938

As at 31 December 2022 and 2021, all investment securities, with the exception of UCIT funds, are listed.

Notes to the financial statements

17 Investment securities (continued)

The movement of investment securities in 2022 and 2021 is as follows:

	Investment securities at FVOCI €'000	31 December Investment securities at amortised cost €′000	er 2022 Investment securities mandatorily at FVTPL €'000	Total €′000
Gross carrying amount at 1 January	555.729	459.385	1.995	1.017.109
Additions	74.411	486.457	1.993	560.868
Disposals and redemptions	(110.668)	(114.195)	_	(224.863)
Repayments	(110.000)	(9.475)	**	(224.863)
Amortisation of discounts/premiums and		(5.475)	_	(3.475)
interest	(4.599)	392	_	(4.207)
Net (losses)/gains from changes in fair values	(40.162)	332	(94)	(40.256)
Net losses transferred to the Income	(10102)		(54)	(40.230)
Statement due to disposal	(104)	_	_	(104)
Changes in fair value due to hedging	(237)	(20.398)	-	(20.625)
Foreign exchange	20.120	26.412	58	46.590
Gross carrying amount at 31 December	494,490	828.578	1.959	1.325.027
Impairment allowance	-	(344)	-	(344)
Carrying amount at 31 December	494.490	828.234	1.959	1.324.683
		31 Decembe	er 2021 Investment	,
	Investment	securities at	securities	
	securities at	amortised	mandatorily	
	FVOCI	cost	at FVTPL	Total
	€′000	€′000	€′000	€′000
Gross carrying amount at 1 January	620 266			
Additions	630.366	362.807	2.189	995.362
Disposals and redemptions	402.946 (488.041)	104.354	(202)	507.300
Maturities	(400.041)	(1.300)	(362)	(488.403)
Repayments	-		-	(1.300)
Amortisation of discounts/premiums and	-	(856)	-	(856)
interest	(4.566)	(1.824)		(6.390)
Net (losses)/gains from changes in fair values	(7.084)	(1.024)	- 95	(6.989)
Net losses transferred to the Income	(7.004)		33	(0.303)
Statement due to disposal	(481)	_	_	(481)
Changes in fair value due to hedging	(,04)	(3.796)	-	(3.796)
Foreign exchange	22.589	(3.750)	73	22.662
Gross carrying amount at 31 December	555.729	459.385	1,995	1.017.109
Impairment allowance		(171)	1.555	(171)
Carrying amount at 31 December	555.729	459.214	1.995	1.016.938

Notes to the financial statements

17 Investment securities (continued)

Fair value reserve: Revaluation of investment securities

The fair value reserve comprises:

- the cumulative net change in fair value of equity securities measured at FVOCI; and
- the cumulative net change in the fair value of debt securities measured at FVOCI until the assets are derecognised or reclassified. This amount is increased by the amount of loss allowance.

The movement of the reserve is as follows:

	2022	2021
	€′000	€′000
Balance at 1 January	(126)	7.380
Net gains from changes in fair value	(40.162)	(7.084)
Net gains from fair value hedging discontinuance	4.712	-
Net gains from changes in fair value of IRS	6.117	-
Net gains from investment securities transferred to Income		
Statement due to disposal	(104)	(481)
(Reversal of impairment allowance)/impairment allowance of		
investment securities at FVOCI	(37)	112
Reversal of impairment allowance on disposal of investment		
securities at FVOCI	(19)	(53)
Balance at 31 December	(29.619)	(126)

18 Investments in subsidiaries

The subsidiary companies and their principal activity are described below:

	<u>Percentage</u>	2022	2021
Name	<u>holding</u>	€′000	€'000
Foramonio Ltd	100%	1	1
Lenevino Holdings Ltd	100%	1	1
Neviko Ventures Ltd	100%	1	1
Rano Investments Ltd	100%	1	1
Amvanero Ltd	100%	1	1
Revasono Holdings Ltd	100%	1	1
Volki Investments Ltd	100%	1	1
Zivar Investments Ltd	100%	1	1
Elerovio Holdings Limited	100%	1	1
Adariano Investments Limited	100%	1	1
	<u>.</u>	10	10

All companies are registered and operate in Cyprus and have been set up to acquire properties from customers in settlement of their obligations with the Bank.

During 2021 the Bank disposed Ragisena Ltd with a profit of €6 thousand. Profits arising on the disposal of subsidiaries were included in "Other income" in the income statement.

Notes to the financial statements

19 Property and equipment

The movement of property and equipment is as follows:

		Motor	cember 2022		
	Leasehold	vehicles and		Right-of-	
	improvements	motor cycles	Equipment	use assets	Total
Cost	€′000	€′000	€′000	€′000	€′000
Balance at 1 January	14 335	74	7.000	24.400	
Additions	14.335 595	71	7.929	24.428	46.763
Write offs			415	48	1.058
Changes due to remeasurements	(54)	-	(119)	- 2 271	(173)
Effect of changes in foreign exchange	•	-	-	2.271	2.271
rates		_		22	22
Balance at 31 December	14.876	71	8.225	26.769	49.941
A					
Accumulated depreciation					
Balance at 1 January	7.532	54	5.229	6.220	19.035
Charge for the year	929	6	645	2.446	4.026
Write offs	(45)	-	(118)	-	(163)
Effect of changes in foreign exchange rates					
Balance at 31 December	8.416			14	14
balance at 31 December	8.410	60	5.756	8.680	22.912
Net book value at 31 December	6.460	11	2.469	18.089	27.029
		31 De Motor	cember 2021		
	Leasehold		cember 2021	Right-of-	
	Leasehold improvements	Motor		Right-of- use assets	Total
		Motor vehicles and	cember 2021 Equipment €'000	Right-of- use assets €'000	Total €′000
Cost	improvements	Motor vehicles and motor cycles	Equipment	use assets	
Cost Balance at 1 January	improvements	Motor vehicles and motor cycles	Equipment	use assets	€′000
Balance at 1 January Additions	improvements €′000	Motor vehicles and motor cycles €'000	Equipment €'000	use assets €′000	
Balance at 1 January Additions Write offs	improvements €'000 14.050	Motor vehicles and motor cycles €'000	Equipment €'000	use assets €′000 23.677	€′000 45.111
Balance at 1 January Additions Write offs Changes due to remeasurements	improvements €'000 14.050 353	Motor vehicles and motor cycles €'000	Equipment €'000 7.313 686	use assets €′000 23.677	€′000 45.111 1.063
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange	improvements €'000 14.050 353	Motor vehicles and motor cycles €'000	Equipment €'000 7.313 686	use assets €'000 23.677 24	€′000 45.111 1.063 (138)
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates	improvements €′000 14.050 353 (68)	Motor vehicles and motor cycles €′000 71	Equipment €'000 7.313 686 (70)	use assets €'000 23.677 24 - 704	€′000 45.111 1.063 (138) 704
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange	improvements €'000 14.050 353	Motor vehicles and motor cycles €'000	Equipment €'000 7.313 686	use assets €'000 23.677 24 - 704	€′000 45.111 1.063 (138) 704
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates	improvements €′000 14.050 353 (68)	Motor vehicles and motor cycles €′000 71	Equipment €'000 7.313 686 (70)	use assets €'000 23.677 24 - 704	€′000 45.111 1.063 (138) 704
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation	improvements €'000 14.050 353 (68) - 14.335	Motor vehicles and motor cycles €'000 71 71 - 71	Equipment €'000 7.313 686 (70) - - 7.929	use assets €'000 23.677 24 - 704 23 24.428	€'000 45.111 1.063 (138) 704 23 46.763
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation Balance at 1 January	improvements €′000 14.050 353 (68) - 14.335	Motor vehicles and motor cycles €'000 71 71 - 48	Equipment €'000 7.313 686 (70) - - 7.929	use assets €'000 23.677 24 - 704 23 24.428	€′000 45.111 1.063 (138) 704 23 46.763
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation	improvements €'000 14.050 353 (68) - 14.335	Motor vehicles and motor cycles €'000 71 71 - 71	Equipment €'000 7.313 686 (70) - - 7.929	use assets €'000 23.677 24 - 704 23 24.428	€′000 45.111 1.063 (138) 704 23 46.763 15.348 3.782
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation Balance at 1 January Charge for the year	improvements €′000 14.050 353 (68) - 14.335	Motor vehicles and motor cycles €'000 71 71 - 48	Equipment €'000 7.313 686 (70) - - 7.929	use assets €'000 23.677 24 - 704 23 24.428	€′000 45.111 1.063 (138) 704 23 46.763
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation Balance at 1 January Charge for the year Write offs	improvements €'000 14.050 353 (68) - 14.335	Motor vehicles and motor cycles €'000 71 71 - 48	Equipment €'000 7.313 686 (70) - - 7.929	use assets €'000 23.677 24 - 704 23 24.428 3.963 2.239	€'000 45.111 1.063 (138) 704 23 46.763 15.348 3.782 (113)
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation Balance at 1 January Charge for the year Write offs Effect of changes in foreign exchange	improvements €'000 14.050 353 (68) - 14.335	Motor vehicles and motor cycles €'000 71 71 - 48	Equipment €'000 7.313 686 (70) - - 7.929	use assets €'000 23.677 24 - 704 23 24.428	€′000 45.111 1.063 (138) 704 23 46.763 15.348 3.782
Balance at 1 January Additions Write offs Changes due to remeasurements Effect of changes in foreign exchange rates Balance at 31 December Accumulated depreciation Balance at 1 January Charge for the year Write offs Effect of changes in foreign exchange rates	improvements €'000 14.050 353 (68)	Motor vehicles and motor cycles €'000 71 71 48 6 -	Equipment €'000 7.313 686 (70) 7.929 4.715 584 (70)	use assets €'000 23.677 24 - 704 23 24.428 3.963 2.239 - 18	€'000 45.111 1.063 (138) 704 23 46.763 15.348 3.782 (113) 18

Notes to the financial statements

19 Property and equipment (continued)

Leasehold improvements relate to premises occupied by the Bank for its own activities.

As at 31 December 2022, the right-of-use assets amounting to €18.089 thousand (2021: €18.208 thousand) refer to leased office and branch premises of €17.914 thousand (2021: €17.967 thousand) and motor vehicles of €175 thousand (2021: €241 thousand).

20 Intangible assets

Intangible assets comprise of computer software.

The movement of computer software is as follows:

	2022	2021
	€′000	€′000
Cost		
Balance at 1 January	27.797	22.368
Additions	9.458	5.450
Write offs	-	(21)
Balance at 31 December	37.255	27.79 7
Accumulated depreciation Balance at 1 January Charge for the year Write offs Balance at 31 December	8.946 714 - 9.660	8.458 509 (21) 8.946
Net book value at 31 December	27.595	18.851

Additions mainly relate to the new core accounting system which is in the process of completion and implementation is expected to be finalised in 2023.

21 Other assets

Prepaid expenses Other assets	2022 €'000 1.293 652 1.945	2021 €'000 1.517 405 1.922
Maturity analysis: Current Non-current	2022 €′000 1.656 289 1.945	2021 €'000 1.622 300 1.922

None of these financial assets are either past due or credit-impaired.

Notes to the financial statements

22 Due to central banks

	2022	2021
	€′000	€′000
Secured borrowing from credit institutions	605.322	607.747

In the face of the Covid-19 pandemic's outbreak, the European Central Bank (ECB) introduced a number of modifications to the terms of the targeted longer-term refinancing operations (COV III) in order to support the continuous access of households and firms to bank credit. In particular, the interest rate on TLTRO III facilities was reduced to -0,5% for the period from June 2020 to June 2021, while for the banks subject to meeting the required lending thresholds for the reference period ended 31 March 2021, the interest rate for the abovementioned period was capped at -1% (i.e. the minimum of the average deposit facility rate minus 0,5% and the rate of -1%). Additionally, based on the ECB's decision in January 2021, the reduction of interest rate to -0,5% was extended to the period from June 2021 to June 2022 (also capped at -1%), provided that certain net lending thresholds for the additional observation period ended 31 December 2021 are met.

Pursuant to the ECB Govering Council decision on 27 October 2022, TLTRO III is recalibrated and the Bank's TLTRO III participation may be voluntarily repaid, according to updated calendar of TLTRO III. Following ECB decision of 27 October 2022, new interest rate periods were introduced as follows:

- post-ASIRP interest rate period (from 24 June 2022 to 22 November 2022) of the respective TLTRO
 III, the interest rate shall be the average rate on the deposit facility over the main interest rate
 period of the respective TLTRO-III
- during the last interest rate period (from 23 November 2022 until the earlier of the maturity date
 or the early repayment date, as applicable) of the respective TLTRO-III, the interest rate shall be
 the average interest rate on the deposit facility over that period.

The Bank assessed the terms of the program and concluded that TLTRO III contains a significant benefit in comparison to the market's pricing for other similarly collateralised borrowings available to the Bank and accounts this benefit as a government grant under IAS 20. Consequently, the Bank considers that the grant is intended to compensate for its funding costs incurred over the term of each TLTRO-III facility and therefore, the benefit is allocated systematically under interest expense.

The Bank increased the borrowing from the TLTRO III- refinancing program by €64.950 thousand from 31 December 2020, reaching €614.950 thousand at the year end 2021.

As at 31 December 2022, the recognised benefit from TLTRO III program amounted to €2.426 thousand (2021: €5.743 thousand), including the benefit resulting from the program's more favourable interest rates for which the Bank has reasonable assurance that it will receive.

As at 31 December 2022, the Bank has recognised on an accrual basis, the benefit of "-0.50%" from TLTRO III for the period June 2021 to June 2022 amounting to €3,2 million (June 2020 to June 2021 amounting to €2,7 million).

Notes to the financial statements

23 Due to credit institutions

Deposits due to credit institutions Settlement balances with credit institutions	2022 €′000 220.981 140.662 361.643	2021 €'000 196.422 72.043 268.465
Maturity analysis: Current: - on demand up to 7 days - between 7 days and 3 months - between 3 months and 1 year	168.959 147.533 890 317.382	93.442 145.513 13.225 252.180
Non-current: - 1 to 5 years - after 5 years	30.853 13.408 44.261 361.643	16.285 16.285 268.465

On 31 May 2022, Eurobank S.A. extended to the Bank a €30 million 3-year non-callable in 2, senior non-preferred loan to cover MREL requirement. The interest rate is fixed for 3 years at 3,86%. The balance of the loan as at 31 December 2022 is €30.103 thousand and is included in "Deposits due to credit institutions".

Amounts due to credit institutions are categorised as financial liabilities measured at amortised cost.

24 Due to customers

	2022	2021
	€'000	€′000
Current accounts	5.139.998	4.646.922
Notice accounts	4.778	5.100
Term deposits	2.058.046	1.937.579
Repurchase agreements		30.039
	7.202.822	6.619.640
Maturity analysis:		
- up to 1 month	6.182.924	5.782.465
- between 1 month and 3 months	509.019	266.689
- between 3 months and 1 year	510.878	569.161
- between 1 year and 5 years	1_	1.325
,	7.202.822	6.619.640

Total client deposits pledged as collateral for credit facilities granted to clients as at 31 December 2022 amounted to \in 670.815 thousand (2021: \in 667.533 thousand).

Amounts due to customers are categorised as financial liabilities measured at amortised cost.

Notes to the financial statements

24 Due to customers (continued)

Special levy on total deposits is imposed by legislation to all Banks and Credit Institutions operating in Cyprus. The special levy is calculated on the level of deposits at previous quarter-end at the rate of 0,0375% per quarter and is payable in quarterly instalments. The government levy on customer deposits for the year ended 31 December 2022 amounted to €6.992 thousand (2021: €5.952 thousand). Following an amendment of the Imposition of Special Credit Institution Tax Law in 2017, the Single Resolution Fund contribution which is charged annually by the Single Resolution Board, is offset by the special levy up to the level of the total annual special levy charge. The 2022 government levy is net of €3.347 thousand (2021: €2.694 thousand) relating to the contribution to the Single Resolution Fund.

25 Other liabilities

	2022	2021
	€'000	€′000
Impairment allowance on financial guarantees and credit related		
commitments (note 4.2.1.3)	8.254	5.384
Lease liabilities (note 28)	18.884	18.771
Balances under settlement relating to bank cheques	23.505	17.991
Duties and other taxes	2.288	1.753
Suppliers and creditors	4.003	3.653
Other liabilities and accruals	37.720	29.937
	94.654	77.489
	2022	2021
	€'000	€'000
Maturity analysis:		0 000
Current	78.041	60.934
Non-current	16.613	16.555
	94.654	77.489

As at 31 December 2022 and 2021, other liabilities and accruals mainly consist of staff related and trading balances. As at 31 December 2022, they also include provisions for operational risk events of €619 thousand (2021: €497 thousand).

Notes to the financial statements

26 Share capital

The par value of the Bank's shares is €10 thousand per share. All shares are fully paid.

The movement of share capital and share premium is as follows:

	No. of shares	Ordinary shares €'000	Share premium €'000	Total €′000
Authorised At 31 December 2022 & 2021	1.500	15.000	-	15.000
lssued At 31 December 2022 & 2021	1.201	12.010	245.384	257.394

There were no changes in the Bank's share capital during the years ended 31 December 2022 and 2021.

All the shares have the same rights.

There are no restrictions on the transfer of ordinary shares and no restrictions on the exercise of voting rights other than the restrictions imposed by the Business of Credit Institutions Law of Cyprus which provides that the approval of the Central Bank of Cyprus is required before the acquisition of shares in the Company, exceeding certain thresholds.

There are no restrictions on the payment of dividends other than those imposed by the Business of Credit Institutions Law of Cyprus under certain circumstances.

Dividends

Net profit for the year ended 31 December 2022 is retained. The Board of Directors will consider during 2023 the payment of a dividend.

27 Transfers of financial assets

The Bank enters into transactions by which it transfers recognised financial assets directly to third parties.

(a) The Bank entered the TLTRO III repo funding programme with the amount of €615 million (2021: €615 million) and pledged to the Central Bank securities of face value €725 million (2021: €609 million) which is unable to use, sell or pledge the transferred assets for the duration of the said transaction. The related liability is recognised in "Due to central banks" (note 22).

Notes to the financial statements

27 Transfers of financial assets (continued)

- (b) The Bank enters into reverse repos transactions with the Group. As at 31 December 2022, the Bank had obtained through reverse repos securities of face value of €1.740 million providing cash to the Group of €1.491 million (31 December 2021: €1.571 million and €1.515 million, respectively). The Bank may sell or pledge any securities obtained through reverse repos and has an obligation to return the securities. The counterparty, the Group, retains substantially all the risks and rewards of ownership and therefore the securities are not recognised by the Bank.
- (c) The Bank enters into security lending transactions, i.e. fee based, non-collateralised securities lending transactions. The Bank (the Lender) is lending a series of sovereign securities and the Borrowers are paying to the Lender on a monthly basis a fee in the range of 0,24%-0,51% (2021: 0,26%-0,53%). The bonds that are used for security lending are either from the Bank's own portfolio or gained through reverse repos with the Group and are High Quality Liquid Assets ("HQLA"). Because of the above transactions, the Bank is unable to use, sell or pledge the transferred assets for the duration of the transaction. As at 31 December 2022, the securities used for security lending transactions amounted in face value to €373 million (31 December 2021: €339 million).

28 Leases – where the Bank is the lessee

The Bank leases a number of branch and office premises as well as motor vehicles.

The majority of the Bank's property leases are under agreements with average term 3 years, with options to extend or terminate the lease according to the terms of each contract, while motor vehicles generally have lease terms of up to 5 years. Extension options held by the Bank are included in the lease term when it is reasonably certain that they will be exercised based on its assessment. Depending on the terms of each lease contract, lease payments are adjusted in line with the Consumer Price Index, as published by the Cyprus Statistical Service, plus an agreed fixed percentage.

Information about leases for which the Bank is a lessee is presented in note 19 as "right-of-use assets" the nature of which is as below:

	2022	2021
	€′000	€'000
Buildings	17.914	17.967
Motor vehicles	175	241
	18.089	18.208

Notes to the financial statements

28 Leases – where the Bank is the lessee (continued)

Right-of-use assets

	31 December 2022 Motor		
	Property	Vehicles	Total
	€'000	€,000	€′000
2022	17.967	241	18.208
Balance at 1 January 2022	17.307	48	48
Additions	2.290	(19)	2.271
Changes due to reassessments		• •	(2.446)
Depreciation charge for the year	(2.351)	(95)	· · · · · · · · · · · ·
Effect of changes in foreign exchange rates	8	475	10.000
Balance at 31 December 2022	17.914	175	18.089
	31 [ecember 2021 Motor	
	Droporty	Vehicles	Total
	Property €′000	venicles €′000	€'000
		€ 000 323	19.714
Balance at 1 January 2021	19.391	323 24	19.714
Additions	704	24	
Changes due to reassessments	704	(405)	704
Depreciation charge for the year	(2.133)	(106)	(2.239)
Effect of changes in foreign exchange rates	5		5
Balance at 31 December 2021	17.967	241	18.208
Lease liabilities See note 4.2.3 for maturity analysis of lease liabilities as at	t 31 December 2	022 and 2021.	
Amounts recognised in profit or loss			
		2022	2021
		€'000	€′000
Leases under IFRS 16		2 333	0 000
Interest on lease liabilities		261	262
interest on lease nabilities			
Amounts recognised in the cash flow statement			
		2022	2021
		€′000	€′000
Total cash outflow for leases		2.456	2.415
I OLAT CASH OUTHOW TO LICASES			

Notes to the financial statements

28 Leases – where the Bank is the lessee (continued)

Extension options

Some leases of office premises contain extension options exercisable by the Bank. Where practicable, the Bank seeks to include extension options in new leases to provide operational flexibility. The extension options held are exercisable only by the Bank and not by the lessors. The Bank assesses at lease commencement date whether it is reasonably certain to exercise the extension options. The Bank reassesses whether it is reasonably certain to exercise the options if there is a significant event or significant changes in circumstances within its control.

Rent concessions

No rent concessions were granted to the Bank as a lessee up to 31 December 2022 and 2021, as direct consequence of the Covid-19 pandemic.

29 Contingencies and commitments

The Bank presents the credit related commitments it has undertaken within the context of its lending related activities into the following three categories: a) financial guarantee contracts, which refer to guarantees and standby letters of credit that carry the same credit risk as loans (credit substitutes), b) commitments to extend credit, which comprise firm commitments that are irrevocable over the life of the facility or revocable only in response to a material adverse effect and c) other credit related commitments, which refer to documentary and commercial letters and other guarantees.

Contingent liabilities:	2022 €′000	2021 €′000
Financial guarantee contracts	201.082	162.316
Credit related commitments	5.892	4.465
	206.974	166.781
Commitments:		
Loan commitments	445.897	540.445

Impairment allowance on credit related commitments and contingent liabilities is presented within "Other liabilities" (note 25).

Capital commitments

As at 31 December 2022 commitments for contracted capital expenditures for the Bank amounted to €2.878 thousand which were for the acquisition of computer software. As at 31 December 2021 commitments for contracted capital expenditures amounted to €5.336 thousand of which €41 thousand were for leasehold improvements and €5.295 thousand for the acquisition of computer software.

Notes to the financial statements

29 Contingencies and commitments (continued)

Legal proceedings

As at 31 December 2022 and 2021 there were no significant pending litigation, claims or assessments against the Bank, the outcome of which would have a material effect on the Bank's financial position or operations.

30 Fiduciary activities

The Bank provides custody, investment management and advisory services to third and related parties which involve the Bank making allocation and purchase and sale decisions in relation to a wide range of financial instruments. Those assets that are held in a fiduciary capacity are not included in these financial statements. At the balance sheet date the Bank had investment custody accounts, including fiduciary assets, with fair value amounting to approximately €4.440.453 thousand (2021: €4.037.239 thousand).

31 Cash and cash equivalents and other information on cash flow statement

For the purpose of the cash flow statement, cash and cash equivalents comprise the following balances with original maturities of three months or less:

	2022	2021
	€'000	€'000
Cash in hand (note 13)	7.784	16.977
Balances with central banks, excluding mandatory deposits (note 13)	3.185.891	2.765.044
Balances with credit institutions (note 14)	1.526.920	1.626.798
	4.720.595	4.408.819

Other income on investment securities presented in operating activities is analysed as follows:

	2022	2021
	€′000	€′000
Reversal of impairment allowance (note 17)	117	(162)
Amortisation of premiums/discounts and accrued interest (note 5)	(21.003)	(15.188)
Foreign exchange differences (note 17)	(46.590)	(22.662)
Gain on fair value hedging discontinuance of investment securities at		
FVOCI (note 17)	4.712	-
Net gains from changes in fair value of investment securities at FVOCI		
(note 17)	6.117	-
Net gains on revaluation of investment securities at FVTPL (note 17)	94	118
Net gains on disposal of investment securities at FVOCI (note 8)	(104)	(481)
Net gains on disposal of investment securities at FVTPL (note 8)		(213)
_	(56.657)	(38.588)

Notes to the financial statements

Cash and cash equivalents and other information on cash flow statement (continued)

Changes in liabilities arising from financing activities

During the year ended 31 December 2022, changes in the Bank's liabilities arising from financing activities of €2.456 thousand are attributable to payments of lease liabilities (2021: €2.415 thousand).

32 Related party transactions and balances

The immediate controlling party of the Bank is Eurobank S.A. registered in Greece. Eurobank Ergasias Services and Holdings S.A., who is the ultimate parent company, owns 100% of the shares of Eurobank S.A. and produces consolidated financial statements available for public use.

The Board of Directors of Eurobank Ergasias Services and Holdings S.A. is the same as the Board of Directors of Eurobank S.A. and part of the key management personnel of the Eurobank S.A. provides services to Eurobank Ergasias Services and Holdings S.A. according to the terms of the relevant agreement between the two entities.

Fairfax Group, which holds 32,99% of Eurobank Ergasias Services and Holdings S.A. voting rights as of 31 December 2022 (31 December 2021: 33%), is considered to have significant influence over the company.

(i) Related party transactions and outstanding balances

A number of banking transactions are entered into with related parties in the normal course of business and are conducted on an arm's length basis. These mainly include loans, deposits derivatives, repurchase agreements, lien agreements and guarantees. In addition, as part of its normal course of business in investment banking activities, the Bank at times may hold positions in debt and equity instruments of related parties.

The outstanding balances with related parties are as follows:

	With Eurobank Ergasias Services and Holdings S.A. and Eurobank S.A.		Other related entities		With key management personnel	
	2022	2021	2022	2021	2022	2021
	€′000	€′000	€′000	€'000	€′000	€′000
Balances:						
Due from credit institutions ¹	1.496.518	1.529.178	480	575	-	-
Loans and advances to customers ²	-	-	29.829	45.707	562	676
Derivative financial instruments –						
Assets	23.801	18.375	-	-		_
Due to credit institutions	289.096	228.549	-	**	•	_
Derivative financial instruments –						
Liabilities	25.200	9.264	**	-	-	140
Due to customers ³	-	-	17.050	10.418	6.792	7.774
Other liabilities	1.625	1.303	367	439	-	

Notes to the financial statements

32 Related party transactions and balances (continued)

(i) Related party transactions and outstanding balances (continued)

The transactions during the year with related parties were as follows:

	With Eurobank Ergasias Services and Holdings S.A. and Eurobank S.A.		Other related entities		With key management personnel	
	2022	2021	2022	2021	2022	2021
	€′000	€′000	€′000	€′000	€′000	€'000
Transactions:						
Interest income ⁴	29.585	8.727	741	691	12	10
Interest expense ⁵	10.874	2.977	(35)	11	4	7
Banking fee and commission income	6.799	235	64	117	-	**
Banking fee and commission expense						
– fees on lien agreement	2.521	1.521	-	-	-	-
– other	558	471	895	761	**	-
Net trading income	27.948	86	-	-	-	-
Staff costs excluding retirement						
benefit costs	-	-	-	-	2.319	2.426
Defined contribution plan	-	-	-	-	208	203
Directors' remuneration	-	-	-	-	1.204	1.132
Other operating expenses	668	540	-	-	-	-

Key management personnel include directors and key management personnel of the Bank, their close family members and entities controlled or jointly controlled by them.

¹Amounts due from credit institutions include reverse repurchase agreements with Eurobank S.A. of €1.490.836 thousand (2021: €1.515.435 thousand) (note 14).

²Loans and advances to customers with other related entities include loans and advances to the Bank's direct subsidiaries of €16.385 thousand (2021: €16.458 thousand).

³Due to customers with other related entities include balances with the Bank's direct subsidiaries of €25 thousand (2021: €25 thousand). They also include balances with the Bank's Defined Contribution Plan of €368 thousand (2021: €360 thousand).

⁴Interest income from other related entities includes income from the Bank's direct subsidiaries of €464 thousand (2021: €315 thousand) and income from the Bank's Defined Contribution Plan of €2 thousand (2021: nil).

⁵Interest expense to other related entities includes negative interest income on the deposits of the Bank's Defined Contribution Plan of €2 thousand (2021: €1 thousand).

Total collaterals in relation to loans and advances to key management personnel amounted to €441 thousand (2021: €441 thousand).

Notes to the financial statements

32 Related party transactions and balances (continued)

(ii) Lien agreements

As of 31 December 2022 and 2021, the Bank has in place lien agreements from Eurobank S.A. of €154.928 thousand (2021: €158.682), which act as guarantees for the purposes of securing loans and advances to customers and financial guarantees.

Based on the lien agreements, in case of default of any of the issuers of the underlying assets, the Bank can set off the receivable amounts with the equivalent funds placed by Eurobank S.A.

33 Events after the balance sheet date

The Bank holds non-significant exposure in Russian or Ukrainian assets and in the banks that have recently faced solvency or liquidity difficulties.

There were no material events after the balance sheet date, which have a bearing on the understanding of the financial statements.

Appendix

Definition of financial ratios included in the Management Report for 2022

- Cost to income ratio: Total operating expenses divided by total operating income.
- Return on equity: Net profit for the year divided by the average equity (the arithmetic average of
 equity at the end of the reported year and at the end of the previous year).
- Loans to deposits: Loans and advances to customers divided by due to customers at the end of the reported year.
- Cost of risk: Impairment allowance on loans and advances charged in the reported year, divided by the average balance of loans and advances to customers (the arithmetic average of loans and advances to customers at the end of the reported year and at the end of the previous year).
- NPE provisions coverage: Impairment allowance for loans and advances to customers, including
 impairment allowance for credit related commitments (off balance sheet items) divided by NPEs at
 the end of the reported period.
- Credit-impaired loans/gross loans: NPEs divided by gross loans and advances to customers (the balance of loans and advances to customers before impairment allowance).
- Capital adequacy ratio: Total regulatory capital as defined by Regulations (EU) No 575/2013 and No 2395/2017, divided by total Risk Weighted Assets (RWA).
- MREL ratio: Total regulatory capital (as above) plus MREL Eligible liabilities Under Directive 2014/59 ("BRRD" or "Bank Recovery and Resolution Directive"), as amended by Directive 2019/879 ("BRRD2") divided by total RWAs.
- Leverage ratio: The leverage ratio is calculated as total regulatory capital divided by total exposure measure, as defined by Regulations (EU) No 575/2013 and No 2395/2017.

