



NATIONAL BANK
OF GREECE

NBG Group
Interim Financial Statements
for the period ended 30 September 2022

November 2022



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Statement of Financial Position

as at 30 September 2022

€ million	Note	Group	
		30.09.2022	31.12.2021
ASSETS			
Cash and balances with central banks		17,572	15,827
Due from banks		3,143	3,639
Financial assets at fair value through profit or loss		311	314
Derivative financial instruments		2,060	4,331
Loans and advances to customers	9	34,498	30,439
Investment securities		13,128	14,937
Investment property		73	80
Equity method investments		20	18
Goodwill, software and other intangible assets		398	353
Property and equipment		1,588	1,655
Deferred tax assets		4,795	4,912
Current income tax advance		250	289
Other assets		2,520	2,671
Non-current assets held for sale	10	522	4,493
Total assets		80,878	83,958
LIABILITIES			
Due to banks	11	13,087	14,731
Derivative financial instruments		2,060	3,014
Due to customers	12	55,679	53,493
Debt securities in issue		901	912
Other borrowed funds		61	79
Deferred tax liabilities		15	15
Retirement benefit obligations		257	271
Current income tax liabilities		3	4
Other liabilities		2,777	2,250
Liabilities associated with non-current assets held for sale	10	26	3,417
Total liabilities		74,866	78,186
SHAREHOLDERS' EQUITY			
Share capital	14	915	915
Share premium account	14	3,542	13,866
Reserves and retained earnings		1,532	(9,264)
Amounts recognised directly in equity relating to non-current assets held for sale		-	233
Equity attributable to NBG shareholders		5,989	5,750
Non-controlling interests		23	22
Total equity		6,012	5,772
Total equity and liabilities		80,878	83,958

Athens, 9 November 2022

THE CHAIRMAN OF THE BOARD OF
DIRECTORS

THE CHIEF EXECUTIVE OFFICER

THE CHIEF FINANCIAL OFFICER

GIKAS A. HARDOUVELIS

PAVLOS K. MYLONAS

CHRISTOS D. CHRISTODOULOU

Income Statement

for the period ended 30 September 2022

€ million	Note	Group	
		9-month period ended 30.09.2022	30.09.2021
Continuing Operations			
Interest and similar income		1,056	1,019
Interest expense and similar charges		(108)	(115)
Net interest income		948	904
Fee and commission income		347	305
Fee and commission expense		(88)	(93)
Net fee and commission income		259	212
Net trading income / (loss) and results from investment securities	4	296	220
Gains / (losses) arising from the derecognition of financial assets measured at amortised cost	4	60	247
Net other income / (expense)		(44)	(54)
Total income		1,519	1,529
Personnel expenses		(342)	(416)
General, administrative and other operating expenses		(150)	(146)
Depreciation and amortisation on investment property, property & equipment and software & other intangible assets		(126)	(116)
Credit provisions and other impairment charges	5	(216)	(34)
Restructuring costs	6	(64)	(86)
Share of profit / (loss) of equity method investments		1	-
Profit before tax		622	731
Tax benefit / (expense)	7	(170)	(10)
Profit for the period from continuing operations		452	721
Discontinued Operations			
Profit for the period from discontinued operations	10	230	47
Profit for the period		682	768
Attributable to:			
Non-controlling interests		2	1
NBG equity shareholders		680	767
Earnings per share (Euro) - Basic and diluted from continuing operations	8	€0.49	€0.79
Earnings per share (Euro) - Basic and diluted from continuing and discontinued operations	8	€0.74	€0.84

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Statement of Comprehensive Income

for the period ended 30 September 2022

€ million	Note	Group	
		9-month period ended 30.09.2022	30.09.2021
Profit for the period		682	768
Other comprehensive income / (expense):			
Items that may be reclassified subsequently to profit or loss:			
Available-for-sale securities, net of tax		(246)	(47)
Investments in debt instruments measured at fair value through other comprehensive income ("FVTOCI"), net of tax		(203)	(122)
Currency translation differences, net of tax		(1)	6
Cash flow hedge, net of tax		18	18
Total of items that may be reclassified subsequently to profit or loss		(432)	(145)
Items that will not be reclassified subsequently to profit or loss:			
Investments in equity instruments measured at FVTOCI, net of tax		(14)	11
Total of items that will not be reclassified subsequently to profit or loss		(14)	11
Other comprehensive income / (expense) for the period, net of tax	15	(446)	(134)
Total comprehensive income / (expense) for the period		236	634
Attributable to:			
Non-controlling interests		2	1
NBG equity shareholders		234	633

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Income Statement

for the period ended 30 September 2022

€ million	Group	
	3-month period ended 30.09.2022	30.09.2021
Continuing Operations		
Interest and similar income	382	345
Interest expense and similar charges	(34)	(37)
Net interest income	348	308
Fee and commission income	126	112
Fee and commission expense	(37)	(38)
Net fee and commission income	89	74
Net trading income / (loss) and results from investment securities	8	(16)
Gains / (losses) arising from the derecognition of financial assets measured at amortised cost	6	-
Net other income / (expense)	(2)	(19)
Total income	449	347
Personnel expenses	(114)	(173)
General, administrative and other operating expenses	(53)	(47)
Depreciation and amortisation on investment property, property & equipment and software & other intangible assets	(43)	(38)
Credit provisions and other impairment charges	(65)	140
Restructuring costs	(2)	(32)
Profit before tax	172	197
Tax benefit / (expense)	(33)	(6)
Profit for the period from continuing operations	139	191
Discontinued operations		
Profit / (Loss) for the period from discontinued operations	(4)	1
Profit for the period	135	192
Attributable to:		
Non-controlling interests	1	-
NBG equity shareholders	134	192
Earnings / (losses) per share (Euro) - Basic and diluted from continuing operations	€0.15	€0.21
Earnings / (losses) per share (Euro) - Basic and diluted from continuing and discontinued operations	€0.15	€0.21

Athens, 9 November 2022

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Statement of Comprehensive Income

for the period ended 30 September 2022

€ million	Group	
	3 month period ended 30.09.2022	30.09.2021
Profit for the period	135	192
Other comprehensive income / (expense):		
Items that may be reclassified subsequently to profit or loss:		
Available-for-sale securities, net of tax	-	(1)
Investments in debt instruments measured at fair value through other comprehensive income ("FVTOCI"), net of tax	(51)	8
Currency translation differences, net of tax	1	-
Cash flow hedge, net of tax	-	1
Total of items that may be reclassified subsequently to profit or loss	(50)	8
Items that will not be reclassified subsequently to profit or loss		
Investment in equity instruments at FVTOCI, net of tax	(2)	2
Total of items that will not be reclassified subsequently to profit or loss	(2)	2
Other comprehensive income/(expense) for the period, net of tax	(52)	10
Total comprehensive income/(expense) for the period	83	202
Attributable to:		
Non-controlling interests	1	-
NBG equity shareholders	82	202

Athens, 9 November 2022

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Statement of Changes in Equity - Group for the period ended 30 September 2022

€ million	Attributable to equity holders of the parent company											Total
	Share capital	Share premium	Treasury shares	Securities at	Currency	Net investment	Cash flow hedge	Defined benefit	Other reserves & Retained earnings	Total	Non-controlling Interests	
	Ordinary shares	Ordinary shares		FVTOCI reserve	translation reserve	hedge reserve	reserve	plans				
Balance at 31 December 2020 and at 1 January 2021	2,744	13,866	(1)	417	59	(111)	(40)	(208)	(11,661)	5,065	20	5,085
Other Comprehensive Income/ (expense) for the period	-	-	-	(159)	6	-	18	-	-	(135)	-	(135)
Gains/(losses) from equity instruments at FVTOCI reclassified to retained earnings	-	-	-	1	-	-	-	-	(1)	-	-	-
Profit for the period	-	-	-	-	-	-	-	-	767	767	1	768
Total Comprehensive Income / (expense) for the period	-	-	-	(158)	6	-	18	-	766	632	1	633
(Purchases)/ disposals of treasury shares	-	-	1	-	-	-	-	-	-	1	-	1
Balance at 30 September 2021	2,744	13,866	-	259	65	(111)	(22)	(208)	(10,895)	5,698	21	5,719
Movements to 31 December 2021	(1,829)	-	-	(64)	4	-	4	9	1,928	52	1	53
Balance at 31 December 2021 and at 1 January 2022	915	13,866	-	195	69	(111)	(18)	(199)	(8,967)	5,750	22	5,772
Other Comprehensive Income/ (expense) for the period	-	-	-	(459)	(1)	-	18	-	-	(442)	-	(442)
Gains/(losses) from equity instruments at FVTOCI reclassified to retained earnings	-	-	-	(4)	-	-	-	-	4	-	-	-
Profit for the period	-	-	-	-	-	-	-	-	680	680	2	682
Total Comprehensive Income / (expense) for the period	-	-	-	(463)	(1)	-	18	-	684	238	2	240
Offsetting of losses with share premium and reserves	-	(10,324)	-	-	-	-	-	-	10,324	-	-	-
Acquisitions, disposals & share capital increases of subsidiaries/equity method investments	-	-	-	-	-	-	-	-	1	1	(1)	-
Balance at 30 September 2022	915	3,542	-	(268)	68	(111)	-	(199)	2,042	5,989	23	6,012

The notes on pages 10 to 39 form an integral part of these Interim Financial Statements

Cash Flow Statement

for the period ended 30 September 2022

€ million	Group	
	9-month period ended	
	30.09.2022	30.09.2021
Cash flows from operating activities		
Profit before tax	858	799
Adjustments for:		
Non-cash items included in income statement and other adjustments:	326	72
Depreciation and amortisation on investment property, property & equipment and software & other intangible assets	126	116
Amortisation of premiums /discounts of investment securities, debt securities in issue and other borrowed funds	49	79
Credit provisions and other impairment charges	112	145
Provision for employee benefits	13	8
Share of (profit) / loss of equity method investments	(1)	-
Result from fair value and cash flow hedges	15	30
Dividend income from investment securities	(3)	(3)
Net (gain) / loss on disposal of property & equipment and investment property	(10)	(2)
Net (gain) / loss on disposal of subsidiaries	(30)	-
Net (gain) / loss on disposal of investment securities	29	(131)
Gain on exchange of Greek Government Bonds	-	(209)
Accrued interest from financing activities and results from repurchase of debt securities in issue	2	2
Accrued interest of investment securities	22	35
Valuation adjustment on instruments designated at fair value through profit or loss	4	2
Other non-cash operating items	(2)	1
Net (increase) / decrease in operating assets:	958	2,009
Mandatory reserve deposits with Central Bank	(3)	8
Due from banks	(513)	671
Financial assets at fair value through profit or loss	6	31
Derivative financial instruments assets	2,395	1,073
Loans and advances to customers	(1,079)	274
Other assets	152	(47)
Net increase / (decrease) in operating liabilities:	825	3,229
Due to banks	(1,674)	1,192
Due to customers	2,182	2,510
Derivative financial instruments liabilities	(463)	(456)
Retirement benefit obligations	(33)	(16)
Insurance related reserves and liabilities	329	44
Income taxes (paid) / received	(18)	(24)
Other liabilities	502	(21)
Net cash from / (for) operating activities	2,967	6,109
Cash flows from investing activities		
Disposals of subsidiaries, net of cash disposed	214	-
Dividends received from investment securities & equity method investments	3	3
Purchase of investment property, property & equipment, software & other and intangible assets	(118)	(113)
Proceeds from disposal of property & equipment and investment property	22	6
Purchase of investment securities	(6,612)	(10,359)
Proceeds from redemption and sale of investment securities	5,683	9,792
Net cash (used in) / provided by investing activities	(808)	(671)
Cash flows from financing activities		
Proceeds from debt securities in issue and other borrowed funds	3	-
Repayments of debt securities in issue, other borrowed funds and preferred securities	(20)	-
Principal elements of lease payments	(46)	(43)
Proceeds from disposal of treasury shares	13	13
Repurchase of treasury shares	(13)	(13)
Net cash from/ (for) financing activities	(63)	(43)
Effect of foreign exchange rate changes on cash and cash equivalents	2	(6)
Net increase / (decrease) in cash and cash equivalents	2,098	5,389
Cash and cash equivalents at beginning of period	16,105	9,784
Cash and cash equivalents at end of period	18,203	15,173

The notes on pages 10 to 39 form an integral part of these Interim Financial Statements

NOTE 1: General information

National Bank of Greece S.A. (hereinafter “NBG” or the “Bank”) was founded in 1841 and its shares have been listed on the Athens Exchange since 1880. The Bank’s headquarters are located at 86 Eolou Street, 10559 Athens, Greece, (Register number G.E.MH. 237901000), tel. (+30) 210 334 1000, www.nbg.gr. By resolution of the Board of Directors, the Bank can establish branches, agencies and correspondence offices in Greece and abroad. In its 181 years of operation, the Bank has expanded on its commercial banking business by entering into related business areas. The Bank and its subsidiaries (hereinafter the “Group”) provide a wide range of financial services including mainly retail, corporate and investment banking, non-performing management, transactional banking, leasing, factoring, brokerage, asset management, real estate management and insurance services. The Group operates mainly in Greece but also abroad through its branch in Cyprus and its subsidiaries in North Macedonia, Romania, Bulgaria, Cyprus, Luxembourg and U.K. Following the respective Bank’s decision in 2021, the Group ceased its operation in Egypt, Malta and NBG London Branch; and therefore the NBG Egypt Branch, the NBG London Branch and the subsidiaries NBG Malta Ltd (formerly known as NBG Bank Malta Ltd) and NBG Malta Holdings Ltd are currently under liquidation.

The Board of Directors (“BoD”) consists of the following members:

Non-Executive Chairman of the Board of Directors

Gikas A. Hardouvelis

Chief Executive Officer

Pavlos K. Mylonas

Executive Members

Christina T. Theofilidi

Independent Non-Executive Members

Avraam C. Gounaris - Senior Independent Director

Matthieu A. Kiss

Claude Edgar L.G. Piret

Aikaterini K. Beritsi

Wietze J.P. Reehoorn

Elena Ana E.V. Cernat

Athanasios Zarkalis

Anne Clementine L. Marion-Bouchacourt

Jayaprakasa (JP) C.S. Rangaswami

Non-Executive Members - Hellenic Financial Stability Fund representative

Periklis F. Drougkas

The Board of Directors Members are elected by the Bank’s General Meeting of Shareholders for a maximum term of three years and may be re-elected. The term of the above Members expires at the Annual General Meeting of the Bank’s Shareholders in 2024.

Moreover, the Annual General Meeting of Shareholders held on 28 July 2022, resolved upon the increase of the number of Board members from twelve (12) to thirteen (13) and the election of Mr. Athanasios Zarkalis as new Independent Non-Executive member of the Board of Directors, in fulfilment of the new position in the Board, with a term equal to the remaining Board members, i.e. up to the Annual General Meeting of Shareholders of 2024.

These Interim Financial Statements have been approved for issue by the Bank’s Board of Directors on 9 November 2022.

NOTE 2: Summary of significant accounting policies

2.1 Basis of preparation

The condensed consolidated Interim Financial Statements as at and for the nine-month period ended 30 September 2022 (the “Interim Financial Statements”) have been prepared in accordance with International Accounting Standard 34 “Interim Financial Reporting”. These Interim Financial Statements include selected explanatory notes and do not include all the information required for full Annual Financial Statements. Therefore, the Interim Financial Statements should be read in conjunction with the consolidated and separate Annual Financial Statements as at and for the year ended 31 December 2021, which have been prepared in accordance with International Financial Reporting Standards (“IFRSs”) as endorsed by the European Union (the “EU”).

The accounting policies adopted are consistent with those of the previous financial year and corresponding interim period, except for the adoption of new and amended standards as set out in section 2.3 “Adoption of International Financial Reporting Standards (“IFRS”)”.

The amounts are stated in Euro, rounded to the nearest million (unless otherwise stated) for ease of presentation. Where necessary, comparative figures have been adjusted to conform to changes in current period’s presentation.

The Interim Financial Statements have been prepared under the historical cost convention, except for fair value through other comprehensive income financial assets, financial assets and financial liabilities held at fair value through profit or loss and all derivative contracts, which have been measured at fair value.

In connection with reviewing the Group’s financial condition in light of the Coronavirus (“COVID-19”) pandemic, the Group evaluated its assets, including intangibles and equity investments, for potential impairment, and assessed fair values of financial instruments that are carried at fair value. Based upon our assessment as of 30 September 2022, no significant impairments have been recorded and there have been no significant changes in fair values nor in the fair value hierarchy classifications (see Note 18 “Fair value of financial assets and liabilities”).

2.2 Going concern

Going concern conclusion

After considering (a) the significant profitability of the Group (b) the current level of European Central Bank (“ECB”) funding solely from Targeted Long-term Refinancing Operations (“TLTROs”) and the current access to the Eurosystem facilities with significant collateral buffer and Liquidity Coverage Ratio (“LCR”) and Net Stable Funding Ratio (“NSFR”) which is well above 100% (c) the Group’s Common Equity Tier 1 (“CET1”) ratio at 30 September 2022 which exceeded the Overall Capital Requirements (“OCR”), (d) the extensive and continuous fiscal and monetary support of the European and Greek authorities in response to the unprecedented COVID-19 crisis, e) the activation of new fiscal measures in response to pressures from increased inflation and (f) the Group’s insignificant exposure to Russia and the Ukraine and Management’s actions with respect to the crises (see Note 21 “Ukraine crisis”), the Board of Directors concluded that the Group is a going concern and thus the application of the going concern principle for the preparation of these Interim Financial Statements is appropriate.

Profitability

The profit from continuing operations for the period ended 30 September 2022 amounted to €452 million for the Group.

Earnings per share from continuing operations in 9M.2022 amounted to €0.49 for the Group.

Liquidity

As at 30 September 2022, funding from the ECB through TLTROs amounted to €11.6 billion (31 December 2021: €11.6 billion, solely TLTROs). Additionally, as at 30 September 2022, the Group’s liquidity buffer at cash values amounted to €26.2 billion, with the LCR and NSFR ratios well above 100%.

Capital adequacy

The Group’s Common Equity Tier 1 (“CET1”) and Total Capital ratios as at 30 September 2022 were 15.6% and 16.7% respectively, exceeding the OCR ratios of 11.75% for 2022, post capital relief measures (see Note 17 “Capital Adequacy”).

Macroeconomic developments

Economic activity in Greece remained on an upward trend in 9M.2022, showing resilience to the increasing headwinds from surging inflation and severe geopolitical uncertainty, buoyed by strong tourism, additional energy-related fiscal support and self-sustained improvements in the labor market and business environment. Greece’s Gross Domestic Product (“GDP”) growth outpaced consensus estimates in 1H.2022 (latest available historical data¹), reaching 7.8% year-over-year (“y-o-y”), remaining one of the highest in the euro area.

This recovery was broad-based, with private consumption increasing by a solid 11.4% y-o-y in 1H.2022, in constant price terms, buoyed by a strong labor market (employment up by 6.9% y-o-y in 8M.2022). Business profits and other earnings from unincorporated business activity rose

¹ Source: ELSTAT, Quarterly National Accounts, 2nd Quarter 2022, Press Release 7 September 2022

Notes to the Interim Financial Statements

Group

by 14.0% y-o-y in 1H.2022, to the highest level, in absolute terms, since 1H.2011. Boding well for future growth, gross fixed capital formation rose by 10.9% y-o-y in 1H.2022, reaching 13.1% as percent of GDP from 10.7% of GDP in FY.2019.

Tourism provided a decisive impulse to economic growth, with latest trends presaging a new all-time high for revenue (already up by €5.2 billion y-o-y in 7M.2022, to 97.7% of 7M.2019 level).

Most of the indicators of economic activity in high frequency remained in expansion territory in 3Q.2022, despite their weakening in q-o-q terms compared with 2Q.2022, showing higher resilience than the euro area average to the more intense and persistent inflation pressures. Natural gas prices, as measured by Dutch Title Transfer Facility (“TTF”) contracts, spiked to a new all-time high in August 2022, posing sharp upward pressure on wholesale electricity market prices, which has been partly offset by increased government subsidies.

Fiscal support to households and firms in FY.2022 is estimated close to €13 billion, in gross value terms, mostly comprising of subsidies to electricity bills and other energy-related support. The Draft Government Budget for 2023, submitted to Parliament on 3 October 2022, envisages a significant decline in the General Government primary deficit in 2022 to 1.7% of GDP, and a return to a primary surplus of 0.7% of GDP in 2023. The gross amount of fiscal support is expected to be lowered in 2023 to c. €10.0 billion from €13.4 billion in 2022, while, in net terms, the fiscal impact is estimated at €3.3 billion in 2023 from €6.0 billion in 2022, mainly comprising energy-support measures. It should be stressed that most part of this support has been financed by revenue raised from a clawback of windfall profits of energy producers and by proceeds from carbon emission trade. Moreover, the impressive pace of GDP growth, gave rise to extremely favourable cyclical effects contributing to the fiscal adjustment in 2022. On the same note, public debt is projected to decline to a 13-year low of 161.6% of GDP in 2023 from 169.1% in 2022 and 193.3% in 2021, following a peak of 206.3% of GDP in the COVID-19 year 2020.

House prices increased by 9.3% y-o-y in 1H.2022, bringing the cumulative appreciation from the lowest point in residential valuations during the Greek crisis in 2017 to 31.2%, a level that remains, however, 24.1% lower than the pre-crisis peak in 2H.2008. Limited supply of new constructions and resilient demand portend a further increase in house prices in the remainder of the year.

Consumer Price Index (“CPI”) inflation in Greece accelerated to 12.0% y-o-y in September 2022, after a marginal slowing to 11.5%, on average, in July-August 2022, due to a new spike in natural gas prices. Developments in the energy front remain a key risk factor for inflation and economic conditions in general, despite some easing of tensions in natural gas markets in October 2022. Against this backdrop, the Federal Reserve (“Fed”) and the ECB are speeding up monetary policy tightening, with markets expecting aggressive policy rate hikes until December 2022 to pose additional pressure on equity and fixed-income market valuations.

The above-described favourable trends until 9M.2022 led to an upward revision of Greece’s GDP growth forecast for FY.2022 by NBS to 5.8% y-o-y compared with a previous forecast of 4.0%, while government and official sector forecasts (International Monetary Fund (“IMF”) have also been revised upwards to 5.3% and 5.2% y-o-y, respectively, from 3.1% and 3.5% y-o-y, as previously set.

Nevertheless, economic prospects for 2023 have deteriorated in the face of persistent energy challenges, ongoing geopolitical turbulence and an increasingly hawkish tone by the ECB and the Fed, which reveal their determination to risk a recession through additional interest rate hikes, in order to combat inflation and re-anchor inflation expectations. Moreover, financial market conditions remain volatile, as market participants attempt to assess the final impact of inflation and monetary tightening on economic and business conditions. Furthermore, there is some risk of emergence of new, more contagious, COVID-19 variants, which could weigh on economic activity, especially on the revived services segment, in a period where margins for additional fiscal support are very limited.

On a positive note, the Greek economy is expected to outperform the euro area in the baseline scenario for 2023, on the back of: i) stronger carryover effects from the momentum gained in 9M.2022; ii) a more favorable starting point as regards its position to the credit cycle, with the business sector hardened by multiyear restructurings; and iii) increasing support from the Recovery and Resilience Facility (“RRF”), with inflows (i.e. grants and loans, excluding leverage), according to the Draft Budget 2023, estimated at €11.2 billion in 2022 - 2023, providing a significant boost to fixed capital investment in 2023.

2.3 Adoption of International Financial Reporting Standards (IFRS)

Amendments to existing standards and the Conceptual Framework effective from 1 January 2022

-IFRS 16 (Amendment): COVID-19-Related Rent Concessions (effective for annual periods beginning on or after 1 April 2021 and effective for the consolidated and separate Financial Statements from 1 January 2022). The amendment extends the application period of the practical expedient in relation to rent concessions by one year to cover rental concessions that reduce leases due only on or before 30 June 2022. The adoption of this amendment did not have a material impact on the consolidated Interim Financial Statements.

-IFRS 3 (Amendments): Reference to the Conceptual Framework (effective for annual periods beginning on 1 January 2022). The amendments update a reference in IFRS 3 to the Conceptual Framework for Financial Reporting without changing the accounting requirements for business combinations. The adoption of these amendments did not have a material impact on the consolidated Interim Financial Statements.

-IAS 16 (Amendments): Property, Plant and Equipment: Proceeds before Intended Use (effective for annual periods beginning on 1 January 2022). The amendments prohibit a company from deducting from the cost of property, plant and equipment amounts received from selling items produced while the company is preparing the asset for its intended use. Instead, a company will recognise such sales proceeds and related cost in the Income Statement. The adoption of these amendments did not have any effect on the consolidated Interim Financial Statements.

Notes to the Interim Financial Statements

Group

-IAS 37 (Amendments): Onerous Contracts: Cost of Fulfilling a Contract (effective for annual periods beginning on 1 January 2022). The amendments specify which costs a company includes when assessing whether a contract will be loss-making. The adoption of these amendments did not have a material impact on the consolidated Interim Financial Statements.

-Annual Improvements to IFRS Standards 2018–2020 Cycle (effective for annual periods beginning on or after 1 January 2022, as issued by the IASB). The amendments applicable to the Group and the Bank are:

IFRS 9 Financial Instruments: Fees in the ‘10 per cent’ test for derecognition of financial liabilities. The amendment clarifies which fees an entity includes when it applies the ‘10 per cent’ test in assessing whether to derecognize a financial liability. Only fees paid or received between the entity (the borrower) and the lender are included, including fees paid or received by either the entity or the lender on the other’s behalf. The adoption of this amendment did not have a material impact on the consolidated Interim Financial Statements.

IFRS 16: Lease Incentives. The amendment to Illustrative Example 13 accompanying IFRS 16 removes from the example the illustration of the reimbursement of leasehold improvements by the lessor, in order to resolve any potential confusion regarding the treatment of lease incentives that might arise because of how lease incentives are illustrated in that example. The adoption of this amendment did not have a material impact on the consolidated Interim Financial Statements.

The amendments to existing standards effective from 1 January 2022 have been endorsed by the EU.

New standards and amendments to existing standards effective after 2022

New standard

-IFRS 17 Insurance Contracts (effective for annual periods beginning on or after 1 January 2023). IFRS 17 was issued in May 2017, including amendments issued in June 2020 and supersedes IFRS 4. IFRS 17 establishes principles for the recognition, measurement, presentation and disclosure of insurance contracts within the scope of this standard and its objective is to ensure that an entity provides relevant information that faithfully represents those contracts. The new standard solves the comparison problems created by IFRS 4 by requiring all insurance contracts to be accounted for in a consistent manner. Insurance obligations will be accounted for using current values instead of historical cost. The standard has been endorsed by the EU.

Due to the sale of the Bank’s insurance subsidiary Ethniki Hellenic General Insurance S.A. (“NIC”), on 31 March 2022 the Group does not expect an impact from the adoption of IFRS 17.

Amendments

-IAS 1 (Amendment): Classification of liabilities as current or non-current (effective for annual periods beginning on or after 1 January 2023). The amendment clarifies that liabilities are classified as either current or non-current depending on the rights that exist at the end of the reporting period. Classification is unaffected by the expectations of the entity or events after the reporting date. The amendment Classification of liabilities as current or non-current was issued in January 2020 and was effective for annual reporting periods beginning on or after 1 January 2022. However, in response to the COVID-19 pandemic, the IASB has deferred the effective date by one year to provide companies with more time to implement any classification changes resulting from those amendments. Classification of Liabilities as Current or Non-current is now effective for annual reporting periods beginning on or after 1 January 2023. Although the consolidated statement of financial position of the Group is presented on a liquidity basis, this amendment makes clear that settlement refers to the transfer to the counterparty of cash, equity instruments, other assets or services. The Group does not expect a material impact from the adoption of this amendment.

-IAS 1 and IFRS Practice Statement 2 (Amendments): Disclosure of Accounting Policies (effective for annual reporting periods beginning on or after 1 January 2023). The amendments require that an entity discloses its material accounting policies, instead of its significant accounting policies. Further amendments explain how an entity can identify a material accounting policy. Examples of when an accounting policy is likely to be material are added. To support the amendment, the Board has also developed guidance and examples to explain and demonstrate the application of the ‘Four-Step Materiality Process’. The Group is currently assessing the impact of this amendment but taking into account the fact that the significant accounting policies, disclosed in Note 2 “*Summary of significant accounting policies*” in the 2021 Annual Report, include all material accounting policies the Group expects to disclose fewer accounting policies for the annual reporting period beginning 1 January 2023.

-IAS 8 (Amendment): Definition of Accounting Estimates (effective for annual reporting periods beginning on or after 1 January 2023). The amendment replaces the definition of a change in accounting estimates with a definition of accounting estimates. Under the new definition, accounting estimates are “monetary amounts in financial statements that are subject to measurement uncertainty”. Entities develop accounting estimates if accounting policies require items in financial statements to be measured in a way that involves measurement uncertainty. The amendments clarify that a change in accounting estimate that results from new information or new developments is not the correction of an error. The Group is currently assessing the impact of this amendment and does not expect a material impact from its adoption.

-IAS 12 (Amendments): Deferred Tax related to Assets and Liabilities arising from a Single Transaction (effective for annual reporting periods beginning on or after 1 January 2023). The amendments require companies to recognise deferred tax on transactions that, on initial recognition, give rise to equal amounts of taxable and deductible temporary differences. This will typically apply to transactions such as leases for the lessee and decommissioning obligations. The Group is currently assessing the impact of this amendment.

-IFRS 17 (Amendment): Initial Application of IFRS 17 and IFRS 9 – Comparative Information (effective for annual periods beginning on or after 1 January 2023). The amendment is a transition option relating to comparative information about financial assets presented on initial application of IFRS 17. The amendment is aimed at helping entities to avoid temporary accounting mismatches between financial assets and insurance

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contract liabilities, and therefore improve the usefulness of comparative information for the users of financial statements. Due to the sale of the Bank's insurance subsidiary NIC on 31 March 2022 the Group does not expect an impact from the adoption of IFRS 17.

-IFRS 16 (Amendment): Lease Liability in a Sale and Leaseback (effective for annual periods beginning on or after 1 January 2024). The amendment clarifies how an entity accounts for a sale and leaseback after the date of the transaction. Sale and leaseback transactions where some or all the lease payments are variable lease payments that do not depend on an index or rate are most likely to be impacted. The requirements are applied retrospectively back to sale and leaseback transactions that were entered into after the date of initial application of IFRS 16.

The amendments to existing standards effective after 2022 have been endorsed by the EU, except for the amendments to IAS 1 Presentation of Financial Statements and IFRS 16 Leases which have not been endorsed by the EU.

Amendment adopted by the Group in prior periods

-Applying IFRS 9 Financial Instruments with IFRS 4 Insurance Contracts (Amendment to IFRS 4). The amendment, which has been endorsed by the EU, introduces two approaches. The amended standard will: a) give all companies that issue insurance contracts the option to recognise in the Statement of Other Comprehensive Income, rather than in the Income Statement, the volatility that could arise when IFRS 9 is applied before the new insurance contracts standard is issued (i.e. the difference between the amounts that would be recognized in profit or loss in accordance with IFRS 9 and the amounts recognized in profit or loss in accordance with IAS 39) – “overlay approach” and b) give companies whose activities are predominantly connected with insurance an optional temporary exemption from applying IFRS 9 until 2021 – “deferral approach”. The entities that defer the application of IFRS 9 will continue to apply IAS 39.

The Amendment ‘Extension of the Temporary Exemption from Applying IFRS 9 (effective for annual periods beginning on or after 1 January 2021) extended the expiry date of the extension described above from 1 January 2021 to 1 January 2023.

On 31 March 2022, the Group sold its insurance subsidiary NIC, however NIC applied this amendment using the deferral approach in the Annual and Interim Consolidated Financial Statements up to the date of sale.

2.4 Critical judgments and estimates

In preparing these Interim Financial Statements for the nine-month period ended 30 September 2022, the critical judgments and estimates made by Management in applying the Group's accounting policies and the key sources of estimation uncertainty were similar to those applied to the consolidated Annual Financial Statements as at and for the year ended on 31 December 2021, except for:

Forward-looking information

For 3Q.2022, economic activity in Greece remained on an upward trend, showing resilience to the increasing headwinds from surging inflation and severe geopolitical uncertainty, buoyed by strong tourism, additional energy-related fiscal support and self-sustained improvements in the labor market and business environment. Greece's GDP growth outpaced consensus estimates in 1H.2022 (latest available historical data), reaching 7.8% y-o-y and remaining one of the highest in the euro area.

This recovery was broad-based, with private consumption increasing by a solid 11.4% y-o-y in 1H.2022, in constant price terms, supported by a strong labor market (employment up by 6.9% y-o-y in 8M.2022 and unemployment rate at a 12-year low of 12.2% in July-August 2022). Business profits and other earnings from unincorporated business activity (approximated by the gross operating surplus and mixed income) rose by 14.0% y-o-y in 1H.2022, to the highest level, in absolute terms, since 1H.2011. Exports of goods and services climbed at an all-time high, representing 38% of GDP in 1H.2022. Boding well for future growth, gross fixed capital formation rose by 10.9% y-o-y in 1H.2022, reaching 13.1% as percent of GDP from 10.7% of GDP in FY.2019.

Tourism gained additional steam in the core months of the tourism season, providing a decisive impulse to economic growth, with latest trends presaging a new all-time high for revenue (already up by €6.1 billion y-o-y in 8M.2022, to 96% of 8M.2019 level).

Most of the indicators of economic activity in high frequency remained in expansion territory in 3Q.2022, despite their weakening in q-o-q terms compared with 2Q.2022, showing higher resilience than the euro area average to the more intense and persistent inflation pressures. Notably, the economic sentiment indicator increased in September 2022 to the highest level since May 2022, following a softening in June-August 2022.

Business turnover posted another impressive expansion of 56% y-o-y in August 2022 (+30% y-o-y excluding energy-related manufacturing activities), from 44% y-o-y in July and 45% y-o-y on average in 2Q.2022, exceeding by €14 billion or 66% its pre-pandemic level.

Fiscal support to households and firms is estimated close to €13 billion in FY.2022, in gross value terms, while it is expected to remain significant though lowered to below €10 billion in 2023 (in net terms, the fiscal impact is estimated at €3.3 billion in 2023 from €6.0 billion in 2022), mainly comprising energy-support measures. It should be stressed that most part of this support has been financed by revenue raised from a clawback of windfall profits of energy producers and by proceeds from carbon emission trade. Moreover, the impressive pace of GDP growth, gave rise to extremely favourable cyclical effects contributing to the fiscal adjustment in 2022. The Draft Government Budget for 2023, submitted to Parliament on 03/10/2022, envisages a significant decline in the General Government primary deficit to 1.7% of GDP in 2022 and a return to a primary surplus of 0.7% of GDP in 2023. On the same note, public debt is projected to decline to a 13-year low of 161.6% of GDP in 2023 from 169.1% in 2022 and 193.3% in 2021, following a peak of 206.3% of GDP in the COVID year 2020.

Nonetheless, the inflationary pressures in 9M.2022 exceeded initial estimates and are expected to take longer to subside. CPI inflation in Greece accelerated to 12.0% y-o-y in September 2022, after a marginal slowing to 11.5%, on average, in July-August 2022, due to a new spike in natural gas prices. Developments in the energy front remain a key risk factor for inflation and economic conditions in general, despite some easing of

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tensions in natural gas markets in October 2022. Against this backdrop, the Fed and the ECB are speeding up monetary policy tightening, with markets expecting aggressive policy rate hikes until early 2023 which, along with heightened recession fears, weigh on equity and fixed-income market valuations, including Greek government bonds.

In this context, Greece's GDP is expected to grow at a healthy average annual pace of 3.0% (baseline scenario) in 2022-2026, whereas the optimistic and the adverse scenarios envisage average annual GDP increases of 4.3% and 0.8%, respectively, in the same period.

All three scenarios represent an informed assessment of the macroeconomic outlook, on the basis of the latest available information, with differences mainly reflecting the assumptions as regards the intensity and the persistence of the evolving energy-driven inflation and supply-side shock and geopolitical risks in the current as well as in the coming years. The probability weighting of the three forward-looking macroeconomic scenarios, i.e. baseline, optimistic and adverse, remained identical to those of 30 June 2022 and 31 December 2021. Specifically, a probability weighting of 55%, 20% and 25% was assigned, respectively.

The macroeconomic variables utilized by the Bank relate to Greek economic factors, while the ECL allowance is mainly driven by the changes in GDP and House Price Index ("HPI"). GDP growth, directly or indirectly, affects the whole spectrum of the projected macro variables which are conditioned on the GDP path, including the HPI. The annual GDP growth in the baseline scenario is expected to reach 5.8%, on average, in FY.2022 and 2.0% in FY.2023 from 8.3% in FY.2021. For the HPI, the values corresponding to the optimistic scenario are exogenously assumed to be equal to those of the baseline over the projection period, in view of the uncertainty and the idiosyncratic non-modeled drivers of this market under the current juncture. The annual HPI growth in the baseline and the optimistic scenarios over the 2022-2026 period is projected at 4.6%, on average, compared with 2.6% in the same period under the adverse scenario.

The impact from new economic conditions, as a result of unexpected events, may not be timely reflected in ECL model outputs, as the inputs and models used for calculating ECL may not capture all characteristics of the market at the date of the Interim Financial Statements. Management critically assesses these conditions and may occasionally conclude to the requirement of ad hoc overlays in order to capture any additional risks. Indicative cases where overlays may be applied include, inter alia, customer support measures (i.e. in the context of the COVID-19 pandemic), as well as recovery strategies to be pursued for NPEs.

A multiplicity of factors continues to affect the ECL allowance, with energy-related risks, slowing economic activity in the euro area and a significantly higher and more persistent inflation remaining the key risk parameters in the near term. Elevated geopolitical uncertainty, both at a global and at a regional level, represents an additional source of concern regarding the economic and business performance, which already took some toll on economic sentiment. Greece's economic performance could be also adversely affected by the diffusion of the recessionary shock across key euro area markets for Greek products and services (especially Germany and Italy). Finally, relatively limited lagged effects from the pandemic shock and the risk of emergence of new, more dangerous, strains of COVID-19, in a period when the COVID booster vaccination program loses momentum worldwide, could put further stress on economic conditions, especially when taking into account the declining capacity of fiscal policy to support further the economy. The Group will continue to evaluate the ECL allowance and the related economic conditions each quarter, in order to timely capture any changes arising from uncertainty on macroeconomic trends.

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NOTE 3: Segment reporting

The Group manages its business through the following business segments:

Retail banking

Retail banking includes all individual customers, professionals, small-medium and small-sized companies (companies with annual turnover of up to €2.5 million). The Bank, through its extended network of branches and digital business, offers to its retail customers various types of loans (mortgage, consumer and small business lending), cards (debit, credit and prepaid cards), deposit, investment and bancassurance products, as well as a wide range of other traditional services and products.

Corporate & investment banking

Corporate & investment banking includes lending to all large and medium-sized companies and shipping finance except for exposures transferred to the Special Assets Unit ("SAU") and investment banking activities. The Group offers its corporate customers a wide range of products and services, including financial and investment advisory services, deposit accounts, loans (denominated in both euro and foreign currency), foreign exchange and trade service activities.

Trouble Assets Units ("TAU")

In order to (a) manage more effectively delinquent, non-performing and denounced loans and (b) ensure compliance with the provisions of the Bank of Greece Executive Committee Act 42/30.5.2014 and Act 47/9.2.2015 and the Code of Conduct (referred to in Article 1(2) of Greek Law 4224/2013), the Bank established two dedicated and independent internal units, one responsible for the management of the Bank's retail loans (the Retail Collection Unit ("RCU")) and the other for the Bank's corporate delinquent exposures, the SAU, which has the overall responsibility for the management of such loans (end-to-end responsibility). In the 30 September 2021 Interim Financial Statements, the RCU were included in Retail Banking segment. In order to report in a manner consistent with the internal reporting provided to the chief operating decision-maker, the comparative figures for 2021 segment reporting were restated by reclassifying the RCU figures from the Retail Banking segment to TAU segment. The impact from the restatement is reported at the end of the current Note under "Restatement" table.

Global markets and asset management

Global markets and asset management includes all treasury activities, asset management (mutual funds and closed end funds), custody services, private equity and brokerage.

Insurance

Until 31 March 2022, the Group offered a wide range of insurance products through its subsidiary company NIC and other subsidiaries in SEE. NIC was classified as Held for Sale and Discontinued Operations. On 31 March 2022, the disposal to CVC Capital Partners was completed, see Note 19 "*Acquisitions, disposals and other transactions*".

International banking operations

The Group's international banking activities include a wide range of traditional commercial banking services, such as commercial and retail credit, trade financing, foreign exchange and taking of deposits. In addition, the Group offers shipping finance, investment banking and brokerage services through certain of its foreign branches and subsidiaries. Non-current assets held for sale as at 31 December 2021 include CAC Coral Ltd. The profit or losses from discontinued operations for the period ended 30 September 2022 and 30 September 2021, include CAC Coral Ltd. NBG Cyprus Ltd was reclassified as continuing operations. The disposal of CAC Coral Ltd completed on 15 July 2022 (see Note 19 "*Acquisitions, disposals and other transactions*").

Other

Includes proprietary real estate management, warehousing business as well as unallocated income and expense of the Group.

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Breakdown by business segment

9-month period ended

30.09.2022	Retail Banking	Corporate & Investment Banking	TAU	Global markets & Asset Management	Insurance	International Banking Operations	Other	Group
Net interest income	213	394	104	201	-	55	(19)	948
Net fee and commission income	134	83	8	16	-	13	5	259
Other	(14)	20	(4)	327	-	19	(36)	312
Total income	333	497	108	544	-	87	(50)	1,519
Direct costs	(244)	(31)	(5)	(16)	-	(39)	(62)	(397)
Allocated costs and provisions ⁽¹⁾	(102)	(90)	(187)	(21)	-	(8)	(93)	(501)
Share of profit of equity method investments	-	-	-	-	-	-	1	1
Profit / (loss) before tax	(13)	376	(84)	507	-	40	(204)	622
Tax benefit / (expense)								(170)
Profit for the period from continuing operations								452
Non-controlling interests								(2)
Profit/(loss) for the period from discontinued operations	-	-	-	-	240	(10)	-	230
Profit attributable to NBG equity shareholders								680
Depreciation and amortisation ⁽¹⁾	30	2	1	1	-	4	88	126
Credit provisions and other impairment charges	(43)	56	162	8	-	8	25	216

⁽¹⁾ Includes depreciation and amortisation on investment property, property & equipment, software & other intangible assets.

Breakdown by business segment

9-month period ended

30.09.2021	Retail Banking	Corporate & Investment Banking	TAU	Global markets & Asset Management	Insurance	International Banking Operations	Other	Group As restated
Net interest income	154	347	197	169	-	51	(14)	904
Net fee and commission income	101	68	10	16	-	13	4	212
Other	(13)	(1)	(8)	470	-	3	(38)	413
Total income	242	414	199	655	-	67	(48)	1,529
Direct costs	(242)	(30)	(5)	(16)	-	(46)	(130)	(469)
Allocated costs and provisions ⁽²⁾	(40)	(24)	(93)	(25)	-	(5)	(142)	(329)
Profit / (loss) before tax	(40)	360	101	614	-	16	(320)	731
Tax benefit / (expense)								(10)
Profit for the period from continuing operations								721
Non controlling interests								(1)
Profit / (loss) for the period from discontinued operations	-	-	-	-	46	1	-	47
Profit attributable to NBG equity shareholders								767
Depreciation, amortisation ⁽²⁾	26	2	1	1	-	3	83	116
Credit provision and other impairment charges	(20)	(3)	(4)	15	-	5	41	34

⁽²⁾ Includes depreciation and amortisation on investment property, property & equipment, software & other intangible assets.

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Breakdown by business segment

	Retail Banking	Corporate & Investment Banking	TAU	Global Markets & Asset Management	Insurance	International Banking Operations	Other	Group
Segment assets as at 30 September 2022								
Segment assets	7,242	22,655	3,135	35,124	-	2,510	4,645	75,311
Current income tax advance and deferred tax assets								5,045
Non-current assets held for sale	-	-	461	-	-	-	61	522
Total assets								80,878
Segment liabilities as at 30 September 2022								
Segment liabilities	45,566	6,634	189	17,114	-	1,690	3,629	74,822
Current income and deferred tax liabilities								18
Liabilities associated with non-current assets held for sale	-	-	-	-	-	-	26	26
Total liabilities								74,866
	Retail Banking	Corporate & Investment Banking	TAU	Global Markets & Asset Management	Insurance	International Banking Operations	Other	Group
Segment assets as at 31 December 2021								
Segment assets	7,052	18,395	3,559	38,420	-	2,739	4,099	74,264
Current income tax advance and deferred tax assets								5,201
Non-current assets held for sale	-	-	445	-	3,893	-	155	4,493
Total assets								83,958
Segment liabilities as at 31 December 2021								
Segment liabilities	43,482	6,325	186	19,250	-	1,951	3,556	74,750
Current income and deferred tax liabilities								19
Liabilities associated with non-current assets held for sale	-	-	-	-	3,413	4	-	3,417
Total liabilities								78,186

In order to report the breakdown by business segment in a manner consistent with the internal reporting provided to the chief operating decision-maker, the comparative figures for 2021 segment reporting were restated by reclassifying the RCU figures from the Retail Banking segment to TAU segment and by reclassifying certain general, administrative and other operating expenses and depreciation and amortization among all business segments of the Bank.

Restatement

Breakdown by business segment

9-month period ended	Retail Banking	Corporate & Investment Banking	TAU	Global markets & Asset Management	Insurance	International Banking Operations	Other	Group
30.09.2021								
Net interest income	(125)	-	141	-	-	7	(16)	7
Net fee and commission income	(8)	-	8	-	-	3	-	3
Other	7	-	8	-	-	1	(15)	1
Total income	(126)	-	157	-	-	11	(31)	11
Direct costs	(8)	(2)	(3)	-	-	(16)	29	-
Allocated costs and provisions	9	(3)	(18)	-	-	4	(5)	(13)
Profit / (loss) before tax	(125)	(5)	136	-	-	(1)	(7)	(2)

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NOTE 4: Net trading income / (loss) and results from investment securities

	Group	
	9-month period ended	
	30.09.2022	30.09.2021
Net trading income / (loss) and results from investment securities	296	220

Net Trading Income during the nine-month period ended 30 September 2022, includes €148 million gains from ineffective hedge accounting relationships while the remaining Net Trading Income result, is mainly due to derivative and BCVA gains following the increase in interest rates.

Net Trading Income during the nine-month period ended 30 September 2021, includes €209 million from non-recurring gains from the Greek government bond swap transaction.

NOTE 5: Credit provisions and other impairment charges

Continuing Operations	Group	
	9-month period ended	
	30.09.2022	30.09.2021
a. Impairment charge for ECL		
Loans and advances to customers at amortised cost	157	8
Net modification loss	3	7
	160	15
b. Impairment charge for securities		
Investment in debt instruments	8	14
	8	14
c. Other provisions and impairment charges		
Impairment of investment property, property and equipment, software & other intangible assets and other assets	1	6
Impairment of investment in subsidiaries and equity method investments	25	(10)
Legal and other provisions	22	9
	48	5
Total	216	34

Impairment charge for ECL at 30 September 2021 includes a release of €0.2 billion relating to the Project Frontier.

NOTE 6: Restructuring costs

For the nine-month period ended 30 September 2022, restructuring costs for the Group include €59 million for the Exit Schemes (30 September 2021: €83 million) and €5 million direct expenditure relating to the Transformation Program (30 September 2021: €3 million).

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NOTE 7: Tax benefit /(expense)

Continuing Operations	Group	
	9-month period ended	
	30.09.2022	30.09.2021
Current tax	(51)	(11)
Deferred tax	(119)	1
Tax benefit / (expense)	(170)	(10)

The nominal corporation tax rate for the Bank for 2022 and 2021 is 29%. Following Greek Law 4646/2019, the withholding tax on dividends distributed from 1 January 2020 onwards was decreased from 10% to 5%.

The unaudited tax years of the Group's investments accounted for by applying the equity method of accounting and subsidiaries are presented in Note 20 "Group companies".

Based on Article 120 of Greek Law 4799/2021 (Government Gazette #A78/18.5.2021), effective from 2021, the corporate income tax rate for legal entities, other than credit institutions, was reduced to 22% from 24%.

NOTE 8: Earnings per share

	Group	
	9-month period ended	
	30.09.2022	30.09.2021
Profit for the period attributable to NBG equity shareholders from continuing operations	450	720
Profit / (loss) for the period from discontinued operations	230	47
Profit for the period attributable to NBG ordinary shareholders from continuing and discontinued operations	680	767
Weighted average number of ordinary shares outstanding for basic and diluted EPS	914,691,221	914,571,309
Earnings per share (Euro) - Basic and diluted from continuing operations	0.49	0.79
Earnings per share (Euro) - Basic and diluted from continuing and discontinued operations	0.74	0.84

NOTE 9: Loans and advances to customers

Loans and advances to customers at amortised cost	Group	
	30.09.2022	31.12.2021
	Mortgage loans	7,953
Consumer loans	1,656	1,648
Credit cards	448	437
Small business lending	1,456	1,457
Retail lending	11,513	11,884
Corporate and public sector lending	24,072	19,863
Gross carrying amount of loans and advances to customers at amortised cost	35,585	31,747
ECL allowance on loans and advances to customers at amortised cost	(1,594)	(1,655)
Net carrying amount of loans and advances to customers at amortised cost	33,991	30,092
Loans and advances to customers mandatorily measured at FVTPL	507	347
Total Loans and advances to customers	34,498	30,439

As at 30 September 2022, the gross carrying amount of loans and advances to customers at amortised cost in corporate and public sector lending includes the Frontier senior notes of €2.8 billion (31 December 2021: €3.1 billion) and a short-term reverse repo of €3.2 billion (31 December 2021: NIL).

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Loans and advances to customers at amortised cost and mandatorily measured at FVTPL | Group

As at 30 September 2022	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Credit impaired Lifetime ECL	Total
Loans and advances to customers at amortised cost				
Mortgage loans				
Gross carrying amount	4,981	2,538	434	7,953
ECL allowance	(22)	(78)	(138)	(238)
Net carrying amount	4,959	2,460	296	7,715
Consumer loans				
Gross carrying amount	1,288	210	158	1,656
ECL allowance	(25)	(27)	(108)	(160)
Net carrying amount	1,263	183	50	1,496
Credit cards				
Gross carrying amount	405	9	34	448
ECL allowance	(8)	(1)	(31)	(40)
Net carrying amount	397	8	3	408
Small business lending				
Gross carrying amount	632	621	203	1,456
ECL allowance	(14)	(73)	(138)	(225)
Net carrying amount	618	548	65	1,231
Corporate lending ⁽¹⁾				
Gross carrying amount	21,175	1,131	1,157	23,463
ECL allowance	(116)	(73)	(719)	(908)
Net carrying amount	21,059	1,058	438	22,555
Public sector lending				
Gross carrying amount	542	52	15	609
ECL allowance	(7)	(3)	(13)	(23)
Net carrying amount	535	49	2	586
Total loans and advances to customers at amortised cost				
Gross carrying amount	29,023	4,561	2,001	35,585
ECL allowance	(192)	(255)	(1,147)	(1,594)
Net carrying amount of loans and advances to customers at amortised cost	28,831	4,306	854	33,991
Loans and advances to customers mandatorily measured at FVTPL				507
Total loans and advances to customers				34,498

⁽¹⁾ The senior notes relating to the Frontier securitization are included in Stage 1 of Corporate lending

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As at 31 December 2021	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Credit impaired Lifetime ECL	Total
Loans and advances to customers at amortised cost				
Mortgage loans				
Gross carrying amount	5,031	2,773	538	8,342
ECL allowance	(30)	(81)	(184)	(295)
Net carrying amount	5,001	2,692	354	8,047
Consumer loans				
Gross carrying amount	1,254	233	161	1,648
ECL allowance	(21)	(32)	(111)	(164)
Net carrying amount	1,233	201	50	1,484
Credit cards				
Gross carrying amount	386	29	22	437
ECL allowance	(5)	(1)	(22)	(28)
Net carrying amount	381	28	-	409
Small business lending				
Gross carrying amount	573	664	220	1,457
ECL allowance	(10)	(92)	(160)	(262)
Net carrying amount	563	572	60	1,195
Corporate lending ⁽¹⁾				
Gross carrying amount	17,052	1,036	1,241	19,329
ECL allowance	(132)	(65)	(687)	(884)
Net carrying amount	16,920	971	554	18,445
Public sector lending				
Gross carrying amount	491	12	31	534
ECL allowance	(6)	(1)	(15)	(22)
Net carrying amount	485	11	16	512
Total loans and advances to customers at amortised cost				
Gross carrying amount	24,787	4,747	2,213	31,747
ECL allowance	(204)	(272)	(1,179)	(1,655)
Net carrying amount of loans and advances to customers at amortised cost	24,583	4,475	1,034	30,092
Loans and advances to customers mandatorily measured at FVTPL				
				347
Total loans and advances to customers				
				30,439

⁽¹⁾ The senior notes relating to the Frontier securitization are included in Stage 1 of Corporate lending

Movement of the ECL allowance on loans and advances to customers at amortised cost

Group	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Credit impaired Lifetime ECL	Total ECL allowance
ECL allowance at 1 January 2022	204	272	1,179	1,655
Transfers between Stages (net)	34	20	(54)	-
Impairment charge for ECL	(46)	(37)	240	157
Modification impact on ECL	-	-	(2)	(2)
Write-offs	-	-	(124)	(124)
Change in the present value of the ECL allowance	-	-	(9)	(9)
Foreign exchange differences and other movements	-	-	(47)	(47)
Reclassified as Held for Sale	-	-	(36)	(36)
ECL allowance at 30 September 2022	192	255	1,147	1,594

Group	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Credit impaired Lifetime ECL	Total ECL allowance
ECL allowance at 1 January 2021	174	240	2,306	2,720
Transfers between Stages (net)	58	134	(192)	-
Impairment charge for ECL	(31)	(88)	173	54
Modification impact on ECL	-	-	(16)	(16)
Derecognition of loans	-	-	184	184
Write-offs	-	(4)	(466)	(470)
Change in the present value of the ECL allowance	-	-	(53)	(53)
Foreign exchange differences and other movements	3	(6)	(21)	(24)
Reclassified as Held for Sale	-	(4)	(736)	(740)
ECL allowance at 31 December 2021	204	272	1,179	1,655

NOTE 10: Assets and liabilities held for sale and discontinued operations

Non-Current Assets and Disposal Groups classified as held for sale and discontinued operations

Non-current assets held for sale at 30 September 2022 comprise of Probank Leasing S.A. (part of Project “Pronto”, see below) while at 31 December 2021 comprised of NIC, CAC Coral Ltd and Probank Leasing S.A. Non-current assets held for sale as of 30 September 2022 and 31 December 2021 also include loan portfolio contemplated disposals mainly relating to Projects “Frontier II”, Project “Solar” and Project “Pronto”. Profit / (loss) from discontinued operations for the period ended 30 September 2022 and 2021, comprises of NIC and CAC Coral Ltd.

Disposal of subsidiaries

Ethniki Hellenic General Insurance S.A.

On 24 March 2021, NBG’s Board of Directors approved the sale of the 90.01% out of 100% stake in NIC and authorized the Bank’s Management to proceed with the signing of the Share Sale and Purchase Agreement (“SPA”) with CVC Capital Partners (“CVC”) on 26 March 2021. The transaction was approved by the Extraordinary General Meeting of NBG’s Shareholders held on 21 April 2021.

The closing of the transaction took place on 31 March 2022, following the reception of the required supervisory approvals by national and EU authorities, see Note 19 “Acquisitions disposals and other capital transactions”.

CAC Coral Ltd

On 16 October 2020, a sale and purchase agreement was signed with Bain Capital for the sale of a 100% stake in CAC Coral Ltd.

The transaction was concluded on 15 July 2022, after the approval of the competent regulatory authorities, (see Note 19 “Acquisitions, disposal and other transactions”).

Disposal of NPE portfolios

Project “Frontier II”

In the context of deleveraging its NPEs through inorganic actions and according to its NPE Divestment Policy, the Bank decided the disposal of a portfolio of Greek Non-Performing Exposures in the form of a rated securitization that will utilize the provisions of Hellenic Asset Protection Scheme (“HAPS”), known as (“Hercules II”). The portfolio includes secured Large Corporate, Small and Medium Enterprises, Small Business Lending, Residential Mortgage loans and Consumer loans with a total gross book value of c. €1 billion (as of the cut-off date 31 December 2021).

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

The transaction is estimated to be completed by end of 2022, subject to required approvals.

Project “Pronto”

The Bank decided the disposal of the Non-Performing leasing exposures through i) the sale of the shares of the Probank Leasing S.A. and ii) the sale of the Bank’s leasing portfolio (ex-FBB) and NBG Leasing S.A. (“NBGL”) leasing portfolio, with a total gross book value of €52 million as of the 30 September 2022.

The transaction is estimated to be completed within the first semester of 2023, subject to required approvals.

Project “Solar”

In December 2021, the Bank decided to launch the divestment of the secured portfolio of SMEs (Project “Solar”) with a gross book value c. €170 million (as of the cut-off date 30 September 2021), through a joint securitization process with the other Greek financial institutions under HAPS. In August 2022, the Bank together with the other Greek financial institutions submitted to the Greek Ministry of Finance a joint application for inclusion of the senior notes to be issued in the context of the Solar Securitization in the HAPS scheme.

The transaction is expected to be completed within the first quarter of 2023, subject to required approvals.

Notes to the Interim Financial Statements

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Condensed Income Statement of discontinued operations ⁽¹⁾

€ million	Group	
	9-month period ended 30.09.2022	30.09.2021
Net interest income	8	34
Net fee and commission income	(6)	(10)
Earned premia net of claims and commissions	52	98
Net trading income / (loss) and results from investments securities	(4)	17
Other income	1	4
Total income	51	143
Operating expenses	(18)	(52)
Credit Provisions and other impairment charges ⁽²⁾	174	(23)
Profit before tax	207	68
Tax benefit/(expense)	(7)	(21)
Profit for the period from discontinued operations	200	47
Profit on disposal (see Note 19)	30	-
Total profit for the period from discontinued operations (attributable to NBG equity shareholders)	230	47

⁽¹⁾ Includes NIC and CAC Coral Ltd.

⁽²⁾ Credit provisions and other impairment charges refer mainly to remeasurement impairments of NIC.

€ million	30.09.2022	30.09.2021
Cash Flows from discontinued operations		
Net cash inflows/(outflows) from operating activities	-	215
Net cash inflows/(outflows) from investing activities	-	(209)
Net cash inflows/(outflows) from financing activities	-	124
Net Cash inflows /(outflows)	-	130

Analysis of non-current assets held for sale and liabilities associated with non-current assets held for sale

ASSETS	Group	
	30.09.2022 ⁽¹⁾	31.12.2021 ⁽²⁾
Due from banks	-	64
Financial assets at fair value through profit or loss	-	27
Loans and advances to customers	514	606
Investment securities	-	3,245
Investment property	6	-
Deferred tax assets	-	17
Insurance related assets and receivables	-	469
Other assets	2	57
Non-current assets held for sale	-	8
Total assets	522	4,493
LIABILITIES		
Insurance related reserves and liabilities	-	2,575
Deferred tax liabilities	-	(1)
Retirement benefit obligations	-	73
Current income tax liabilities	-	5
Other liabilities	26	765
Total liabilities	26	3,417

⁽¹⁾ Includes Probank Leasing S.A.

⁽²⁾ Includes NIC, Probank Leasing S.A. and CAC Coral Ltd.

NOTE 11: Due to banks

Due to Banks mainly comprise of the Bank's participation in the TLTRO operations which as at 30 September 2022 amounted to €11.6 billion (31 December 2021: €11.6 billion). During the nine-month period ended 30 September 2022, interest income recorded in respect to these transactions is presented in Net Interest Income and amounted to €58 million (30 September 2021: €84 million). For more information regarding TLTRO transactions please refer to Note 30 "Due to banks" of the Annual Financial Statements as at and for the year ended 31 December 2021.

At a Group level, "Due to Banks", as at 30 September 2022, also include securities sold under agreements to repurchase with financial institutions of NIL and other deposits with financial institutions of €1.5 billion (31 December 2021: €1.2 billion and €1.9 billion, respectively).

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NOTE 12: Due to customers

	Group	
	30.09.2022	31.12.2021
Deposits:		
Individuals	41,681	39,835
Corporate	11,936	11,912
Government and agencies	2,062	1,746
Total	55,679	53,493

	Group	
	30.09.2022	31.12.2021
Deposits:		
Savings accounts	30,822	28,957
Current & Sight accounts	15,836	15,311
Time deposits	7,076	7,971
Other deposits	1,945	1,254
Total	55,679	53,493

Included in time deposits are deposits which contain one or more embedded derivatives. The Group has designated such deposits as financial liabilities at fair value through profit or loss. As at 30 September 2022, these deposits amounted to €549 million (31 December 2021: €467 million).

In accordance with Greek Law 4151/2013, all dormant deposit accounts are subject to statute of limitations of 20 years in favour of the Greek State. All banks operating in Greece are required by April of every year to remit the cash balances of such dormant accounts to the Greek State. The Bank until 30 September 2022 had remitted to the Greek State NIL in respect of dormant account balances.

NOTE 13: Contingent liabilities, pledged assets and commitments

a. Legal proceedings

The Bank and certain of its subsidiaries are defendants in certain claims and legal actions and proceedings arising in the ordinary course of business. These actions and proceedings are generally based on alleged violations of consumer protection, banking, employment and other laws. None of these actions and proceedings is individually material. The Group establishes provisions for all litigations, for which it believes it is probable that a loss will be incurred and the amount of the loss can be reasonably estimated. These provisions may change from time to time, as appropriate, in light of additional information. For the cases for which a provision has not been recognized, management is not able to reasonably estimate possible losses, since the proceedings may last for many years, many of the proceedings are in early stages, there is uncertainty as to the likelihood of the final result, there is uncertainty as to the outcome of pending appeals and there are significant issues to be resolved. However, in the opinion of management, after consultation with legal counsel, the final outcome of these matters is not expected to have a material adverse effect on the Group's Statement of Financial Position, Income Statement and Cash Flow Statement, taking into account that as at 30 September 2022 the Group has provided for cases under litigation the amount of €32 million (31 December 2021: €65 million).

b. Pending tax audits

Tax authorities have not yet audited all subsidiaries for certain financial years and accordingly their tax obligations for those years may not be considered final. Additional taxes and penalties may be imposed as a result of such tax audits; although the amount cannot be determined, it is not expected to have a material effect on the Group's Statement of Financial Position.

The years 2011-2016 have been tax audited by Deloitte Certified Public Accountants S.A., in accordance with article 82 of Greek Law 2238/1994 and subsequently with article 65A of Greek Law 4174/2013 and the tax audit certificates which were unqualified, were issued on 27 July 2012, 27 September 2013, 10 July 2014, 30 October 2015, 30 September 2016 and 23 October 2017 respectively. The years 2017, 2018, 2019 and 2020 have been tax audited by PwC S.A. and the tax certificates, which were unqualified, were issued on 26 October 2018, 31 October 2019, 27 October 2020 and 27 October 2021, respectively. The year 2021 was tax audited by PwC S.A. and the tax certificate, which was unqualified, was issued on 27 October 2022.

On 31 March 2022, the right of the tax authorities to issue a deed for re-calculation of income tax for the years up to and including year 2014 expired. For the years 2015 onwards, in accordance with the Ministerial Decision 1006/2016 there is no exception from tax audit by the tax authorities for those entities that have been tax audited by an independent auditor who has issued an unqualified tax audit certificate.

Therefore, the tax authorities may re-audit the tax books of the Bank for those years. However, the Bank does not expect any material effect on the Group's Statement of Financial Position.

For the subsidiaries and associates regarding unaudited tax years refer to Note 20 "Group companies".

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c. Credit commitments

In the normal course of business, the Group enters into a number of contractual commitments on behalf of its customers and is a party to financial instruments with off-balance sheet risk to meet the financing needs of its customers. These contractual commitments consist of commitments to extend credit, commercial letters of credit and standby letters of credit and guarantees. Commitments to extend credit are agreements to lend to a customer as long as there is no violation of the conditions established in the contract. Commercial letters of credit ensure payment by the Bank to a third party for a customer's foreign or domestic trade transactions, generally to finance a commercial contract for the shipment of goods. Standby letters of credit and financial guarantees are conditional commitments issued by the Group to guarantee the performance of a customer to a third party. All of these arrangements are related to the normal lending activities of the Group. The Group's exposure to credit loss in the event of non-performance by the other party to the financial instrument for commitments to extend credit, commercial and standby letters of credit is represented by the contractual nominal amount of those instruments. The Group uses the same credit policies in making commitments and conditional obligations as it does for on-balance sheet instruments.

	Group	
	30.09.2022	31.12.2021
Standby letters of credit and financial guarantees written	4,157	2,960
Commercial letters of credit	970	1,019
Total	5,127	3,979

In addition to the above, credit commitments also include commitments to extend credit which at 30 September 2022 amounted to €11,743 million for the Group (31 December 2021: €9,225 million). Commitments to extend credit at 30 September 2022 do not include any amounts, which cannot be cancelled without certain conditions being met at any time and without notice, or for which automatic cancellation due to credit deterioration of the borrower is not allowed.

d. Assets pledged

	Group	
	30.09.2022	31.12.2021
Assets pledged as collateral	16,009	16,256

As at 30 September 2022, the Group has pledged mainly for funding purposes with the ECB and financial institutions, the following instruments:

- trading and investment debt instruments of €8,671 million (31 December 2021: €8,824 million);
- loans and advances to customers at amortised cost amounting to €5,638 million (31 December 2021: €5,787 million); and
- covered bonds of a nominal value of €1,700 million backed with mortgage loans of total value of €3,393 million (31 December 2021: €1,645 million backed with mortgage loans of total value of €3,327 million).

In addition to the pledged items presented above, as at 30 September 2022, the Group has pledged an amount of €312 million (31 December 2021: €313 million) included in due from banks with respect to a guarantee for the non-payment risk of the Hellenic Republic, as well as Hellenic Republic Treasury bills of €443 million (31 December 2021: €664 million) for trade finance transactions.

NOTE 14: Share capital, share premium and treasury shares

Share Capital – Ordinary Shares

The total number of ordinary shares as at 30 September 2022 and 31 December 2021 was 914,715,153, with a nominal value of 1.00 Euro per share.

On 28 July 2022, the Annual General Meeting of the Bank's shareholders decided, the offsetting of (a) the special reserve of article 31, par. 2, Greek Law 4548/ 2018 (former special reserve of article 4, par. 4a, Greek Law 2190/1920) of €5,014 million and (b) part of the share premium account of €10,324 million with accumulated accounting losses €15,338 million, according to articles 31 par. 2 and 35 par. 3 of Greek Law 4548/2018, as in force. The offsetting of the special reserve and the share premium with the accumulated accounting losses serves the purpose of rationalizing the accounting and regulatory equity of the Bank and the Group and facilitating potential future dividends distribution. On 8 September 2022, the offsetting was approved by the regulatory authorities.

Following the decision of the Annual General Meeting of the Bank's shareholders on 30 July 2021, to decrease the Bank's share capital by €1,829 million from €2,744 million, by reducing the nominal value of each common registered share from 3.00 Euros to 1.00 Euro (without any change in the total number of common registered shares), to set off equal cumulative accounting losses of previous years, on 26 October 2021, the Ministry of Development and Investments (Decision No 2420390/26.10.2021), approved the decision.

The Athens Exchange Corporate Actions Committee at its meeting held on 18 November 2021 was informed about the reduction of the nominal value of the Bank's shares. Following this, 22 November 2021, was determined as the date of change of the nominal value of the Bank's share to 1.00 Euro.

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Treasury shares

Treasury shares transactions are conducted by the Group subsidiary, NBG Securities S.A. and are summarized as follows:

	Group	
	No of shares	€ million
At 1 January 2021	335,818	1
Purchases	6,274,150	15
Sales	(6,572,455)	(16)
At 31 December 2021	37,513	-
Purchases	3,905,235	13
Sales	(3,922,362)	(13)
At 30 September 2022	20,386	-

NOTE 15: Tax effects relating to other comprehensive income / (expense) for the period

Group	9-month period ended 30.09.2022			9-month period ended 30.09.2021		
	Gross	Tax	Net	Gross	Tax	Net
Items that may be reclassified subsequently to profit or loss:						
Unrealised gains / (losses) on investments in available-for-sale for the period	(217)	35	(182)	(49)	19	(30)
Reclassification adjustments on investments in available-for-sale included in the income statement	(35)	8	(27)	(18)	1	(17)
Impairment loss recognized on investments in available-for-sale	1	-	1	-	-	-
Unrealised gains / (losses) on investments in debt instruments measured at FVTOCI	(291)	-	(291)	(28)	-	(28)
Losses / (Gains) on investments in debt instruments measured at FVTOCI reclassified to profit or loss on disposal	87	-	87	(90)	-	(90)
ECL impairment recognised to profit or loss	1	-	1	(4)	-	(4)
Gain reclassified to income statement on disposal of NIC	(38)	-	(38)	-	-	-
Investments in debt instruments	(492)	43	(449)	(189)	20	(169)
Currency translation differences	(5)	-	(5)	6	-	6
Loss reclassified to income statement on disposal of NIC	4	-	4	-	-	-
Currency translation differences	(1)	-	(1)	6	-	6
Cash flow hedge	18	-	18	18	-	18
Total of items that may be reclassified subsequently to profit or loss	(475)	43	(432)	(165)	20	(145)
Items that will not be reclassified subsequently to profit or loss:						
Gains / (losses) on investments in equity instruments measured at FVTOCI	(10)	-	(10)	10	-	10
(Gains)/losses on investments in equity instruments designated as at FVTOCI transferred to retained earnings upon disposal	(4)	-	(4)	1	-	1
Total of items that will not be reclassified subsequently to profit or loss	(14)	-	(14)	11	-	11
Other comprehensive income / (expense) for the period	(489)	43	(446)	(154)	20	(134)

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NOTE 16: Related party transactions

The nature of the significant transactions entered into by the Group with related parties during the 9-month period ended 30 September 2022 and 30 September 2021 and the significant balances outstanding as at 30 September 2022 and 31 December 2021 are presented below.

a. Transactions with members of the Board of Directors and management

The Group entered into transactions with the members of the Board of Directors, the General Managers and the members of the Executive Committees of the Bank, the key management of other Group companies, as well as with the close members of family and entities controlled or jointly controlled by those persons.

All loans granted to related parties (i) were made in the ordinary course of business, (ii) were made on substantially the same terms, including interest rates and collaterals, as those prevailing at the time for comparable transactions with other persons, and (iii) did not involve more than the normal risk of collectability or present other unfavourable features.

The members of the Board of Directors of the Bank are disclosed in Note 1 "General Information".

As at 30 September 2022, loans and advances to customers, deposits/liabilities and letters of guarantee, at Group level, amounted to €4 million, €7 million and NIL respectively (31 December 2021: €4 million, €5 million and NIL respectively).

Total compensation to related parties for the period ended 30 September 2022, amounted to €6 million for the Group (30 September 2021: €7 million), mainly relating to short-term benefits, in particular salaries and social security contributions.

b. Transactions with subsidiaries, associates and joint ventures

At a Group level, only transactions and balances with associates and joint ventures are included, as transactions and balances with subsidiaries are eliminated on consolidation.

	Group	
	30.9.2022	31.12.2021
Assets	7	5
Liabilities	16	17
Letters of guarantee, contingent liabilities and other off-balance sheet accounts	3	2

	9 month period ended	
	30.9.2022	30.9.2021
Interest, commission and other income	-	-
Interest, commission and other expense	2	2

c. Transactions with other related parties

The total receivables of the Group, from the employee benefits related funds as at 30 September 2022, amounted to €747 million (31 December 2021: €747 million). For these receivables the Group recognized a provision of €743 million (31 December 2021: €739 million).

The total payables of the Group to the employee benefits related funds as at 30 September 2022, amounted to €35 million (31 December 2021: €112 million). The decrease of total payables is due to the disposal of NIC and its related employee benefits funds which was completed on 31 March 2022.

d. Transactions with Hellenic Financial Stability Fund

Taking into consideration the Hellenic Financial Stability Fund ("HFSF") Law, the Relationship Framework Agreement ("RFA") between the Bank and the HFSF that was signed in December 2015, the fact that the HFSF holds 40.39% of the Bank's ordinary shares, of which 38.92% with full voting rights and that the HFSF has representation in the Bank's Board of Directors and other Board Committees of the Bank, the HFSF is considered a related party of the Group. Other than the ordinary shares issued by the Bank and held by the HFSF, no material transactions or balances exist with the HFSF.

NOTE 17: Capital adequacy

In June 2013, the European Parliament and the Council of Europe issued Directive 2013/36/EU and Regulation (EU) No 575/2013 (known as Capital Requirements Directive IV ("CRD IV") and Capital Requirements Regulation ("CRR") respectively), which incorporate the key amendments that have been proposed by the Basel Committee for Banking Supervision (known as Basel III). Directive 2013/36/EU has been transported into Greek Law by virtue of Greek Law 4261/2014 and Regulation (EU) No 575/2013 has been directly applicable to all EU Member States since 1 January 2014 and certain changes under CRD IV were implemented gradually.

Regulation (EU) No 575/2013 as amended by Regulation (EU) No 876/2019 (CRR2) defines the minimum capital requirements (Pillar 1 requirements) and Directive 2013/36/EU as amended by Directive 2019/878/EU (CRD V) defines the combined buffer requirements for EU institutions. In addition, Directive 2013/36/EU provides (Art. 97 et seq.) that Competent Authorities regularly carry out the Supervisory Review

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and Evaluation process (“SREP”), to assess and measure risks not covered, or not fully covered, under Pillar 1 and determine additional capital and liquidity requirements (Pillar 2 requirements). SREP is conducted under the lead of the ECB. The SREP decision is tailored to each bank’s individual profile.

The table below summarises capital requirements for the NBG Group for 2022 and 2021:

	CET1 Capital Requirements				Overall Capital Requirements			
	2022 post capital relief measures	2021 post capital relief measures	2022	2021	2022 post capital relief measures	2021 post capital relief measures	2022	2021
Pillar 1	4.50%	4.50%	4.50%	4.50%	8.00%	8.00%	8.00%	8.00%
Pillar 2	1.69%	1.69%	1.69%	1.69%	3.00%	3.00%	3.00%	3.00%
Capital Conservation Buffer	-	-	2.50%	2.50%	-	-	2.50%	2.50%
O-SII Buffer	0.75%	0.50%	0.75%	0.50%	0.75%	0.50%	0.75%	0.50%
Total	6.94%	6.69%	9.44%	9.19%	11.75%	11.50%	14.25%	14.00%

The capital adequacy ratios for the Group are presented in the table below:

	Group			
	30.09.2022	30.09.2022	31.12.2021	31.12.2021
		Pro-forma ¹		Pro-forma ¹
Common Equity Tier 1	15.6%	16.2%	14.1%	16.9%
Tier 1	15.6%	16.2%	14.1%	16.9%
Total	16.7%	17.3%	14.7%	17.5%

(1) Pro-forma figures have been calculated including profit for the period.

DTC Law

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

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

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

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

As of 30 September 2022, the amount of DTAs that were eligible for conversion to a receivable from the Greek State subject to the DTC Law was €3.9 billion (31 December 2021: €4.1 billion). The conditions for conversion rights were not met in the year ended 31 December 2021 and no conversion rights are deliverable in 2022.

2022 ECB Climate risk Stress Test

On 27 January 2022, ECB launched a supervisory climate risk stress test to assess how prepared banks are for dealing with financial and economic shocks stemming from climate risk. The exercise was conducted in the first half of 2022 under common methodological rules and scenario assumptions and ECB published its aggregate results in July 2022.

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The Exercise was primarily prescribed by ECB as one of pivotal, but also mutually learning nature for all participating Banks and Supervisors, forming part of the green transition roadmap and effective management of climate risks. In this context, the 2022 Climate risk Stress Test does not constitute a solvency exercise; its outcome will inform the Supervisory Review and Evaluation Process (SREP) from a qualitative perspective, without a direct impact on capital through the Pillar 2 guidance.

NBG's overall performance was in line with the average of the EU-wide participating institutions. In terms of advancement in the internal climate stress-testing capabilities (qualitative part of the Exercise), the Bank ranked above the average of Total EU sample at Medium-Advance level, while in the domestic banking sector, NBG's overall transition impact on Business Model viability was assessed as of relatively lower risk (Advanced scoring).

MREL Requirements

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

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

On 24 January 2022, the Bank as being identified by the SRB as the Single Point of Entry ("SPE") of the Group and the only entity required to maintain an MREL capacity, received from the Bank of Greece the SRB's decision that should meet by 31 December 2025 an MREL target of 23.29% of TREA and 5.87% of LRE on a consolidated basis. In addition, as per the MREL decision the Bank should always meet, from 1 January 2022 onwards, the requirement of 14.79% of TREA and 5.85% of LRE on a consolidated basis. To the above requirements the capital buffer requirement ("CBR") must be added, which from 1 January 2022 stands at 3.25% and is expected to increase to 3.50% until 31 December 2025. The Bank maintains the MREL capacity required to meet both the LRE requirements and the 1 January 2022 interim binding target of 18.04 % of TREA (including CBR).

Finally, according to the abovementioned SRB's decision, for 2022 no subordination requirement is set for the Bank.

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NOTE 18: Fair value of financial assets and liabilities

a. Financial instruments not measured at fair value

The table below summarises the carrying amounts and the fair values of those financial assets and liabilities that are not presented on the Group's Statement of Financial Position at fair value and the fair value is materially different from the carrying amount.

	Carrying amount	Fair value
Group	30.09.2022	30.09.2022
Financial Assets		
Loans and advances to customers	34,076	34,367
Investment securities at amortised cost	10,478	9,179
Financial Liabilities		
Due to customers	55,152	55,200
Debt securities in issue	901	856

	Carrying amount	Fair value
Group	31.12.2021	31.12.2021
Financial Assets		
Loans and advances to customers	30,092	29,467
Investment securities at amortised cost	12,102	12,128
Financial Liabilities		
Due to customers	53,026	53,090
Debt securities in issue	912	974

The following methods and assumptions were used to estimate the fair values of the above financial instruments at 30 September 2022 and 31 December 2021:

The carrying amount of cash and balances with central banks, due from and due to banks, other borrowed funds as well as accrued interest, approximates their fair value.

Loans and advances to customers at amortised cost: The fair value of loans and advances to customers at amortised cost is estimated using discounted cash flow models. The discount rates are based on current market interest rates offered for instruments with similar terms to borrowers of similar credit quality.

Investment securities at amortised cost: The fair value of investment securities at amortised cost is estimated using market prices or using discounted cash flow models based on current market interest rates offered for instruments with similar credit quality.

Due to customers: The fair value for demand deposits and deposits with no defined maturity is determined to be the amount payable on demand at the reporting date. The fair value for fixed-maturity deposits is estimated using discounted cash flow models based on rates currently offered for the relevant product types with similar remaining maturities.

Debt securities in issue: The fair value of debt securities in issue is estimated using market prices, or if such are not available, using a discounted cash flow analysis, based on current market rates of similar maturity and credit quality debt securities.

b. Financial instruments measured at fair value

The tables below present the fair values of those financial assets and liabilities presented on the Group's Statement of Financial Position as at fair value by fair value measurement level at 30 September 2022 and 31 December 2021. Other Assets include an investment in spot position for emission rights which is carried at fair value through profit or loss for the Group. Other Liabilities include debt securities from short selling activities which are carried at fair value through profit or loss for the Group.

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As at 30 September 2022

Fair value measurement using

	Level 1	Level 2	Level 3	Total at fair value
Financial Assets				
Financial assets at fair value through profit or loss	109	97	-	206
Financial assets mandatorily at fair value through profit or loss	91	9	512	612
Derivative financial instruments	2	2,045	13	2,060
Investment securities at fair value through other comprehensive income	868	1,727	54	2,649
Other Assets	147	-	-	147
Total	1,217	3,878	579	5,674
Financial Liabilities				
Due to customers designated as at fair value through profit or loss	-	527	-	527
Derivative financial instruments	6	1,954	100	2,060
Other Liabilities	-	97	-	97
Total	6	2,578	100	2,684

As at 31 December 2021

Fair value measurement using

	Level 1	Level 2	Level 3	Total at fair value
Financial Assets				
Financial assets at fair value through profit or loss	167	114	-	281
Financial assets mandatorily at fair value through profit or loss	1	24	354	379
Derivative financial instruments	1	4,296	34	4,331
Investment securities at fair value through other comprehensive income	2,002	807	26	2,835
Other assets	330	-	-	330
Total	2,501	5,241	414	8,156
Financial Liabilities				
Due to customers designated as at fair value through profit or loss	-	467	-	467
Derivative financial instruments	-	3,008	6	3,014
Total	-	3,475	6	3,481

There were no assets or liabilities classified as held-for-sale in the Group's Statement of Financial Position measured at fair value as at 30 September 2022. The table below presents the fair values for the assets and liabilities classified as held-for-sale in the Group's Statement of Financial Position and measured at fair value for 31 December 2021:

Held for Sale Operations - Financial instruments measured at fair value | Group

As at 31 December 2021

Fair value measurement using

	Level 1	Level 2	Level 3	Total at fair value
Financial Assets				
Financial assets at fair value through profit or loss	7	20	-	27
Investment securities at fair value through other comprehensive income	1,467	1,722	15	3,204
Insurance related assets and receivables	173	112	-	285
Total	1,647	1,854	15	3,516

Transfers between Level 1 and Level 2

As at 30 September 2022, a fair value through other comprehensive income security issued by the Italian Republic, for which the Group determined that sufficient liquidity and trading did not exist as of that date, has been transferred from Level 1 to Level 2 according to the Group's fair value hierarchy policy. The carrying amount of the fair value through other comprehensive income security transferred as at 30 September 2022 was €130 million. In addition, two fair value through profit or loss securities issued by European Financial Stability Facility ("EFSF") and the European Stability Mechanism ("ESM") for which the Group determined that sufficient liquidity and trading did not exist as of that date, have been also transferred from Level 1 to Level 2 according to the Group's fair value hierarchy policy. The carrying amount of the fair value through profit or loss securities transferred as at 30 September 2022 was €11 million. Also, a fair value through profit or loss security issued by the Kingdom of Spain for which the Group determined that sufficient liquidity and trading existed as of that date, has been transferred from Level 2 to Level 1 according to the Group's fair value hierarchy policy. The carrying amount of the fair value through profit or loss security transferred as at 30 September 2022 was €2 million.

As at 31 December 2021, certain fair value through profit or loss securities issued by European Stability Mechanism ("ESM") for which the Group determined that sufficient liquidity and trading existed as of that date, have been transferred from Level 2 to Level 1 according to the Group's fair value hierarchy policy. The carrying amount of the fair value through profit or loss securities transferred as at 31 December 2021 was €4 million.

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All transfers between levels are assumed to happen at the end of the reporting period.

Level 3 financial instruments

Level 3 financial instruments at 30 September 2022 and 31 December 2021 include:

- Derivative products, which are valued using valuation techniques with significant unobservable inputs, including certain correlation products, such as correlation between various interest indices. They also include derivatives for which the credit value adjustment ("CVA") is based on significant unobservable inputs and the amount of the CVA is significant relative to the total fair value of the derivative.
- Mandatorily at fair value through profit or loss items, include securities for which the models used to estimate their fair value is based on unobservable credit spreads or which are price-based and the price is obtained from the issuers of the securities. They also include loans and advances to customers mandatorily measured at fair value through profit or loss, valued using discounted cash flow valuation techniques incorporating unobservable credit spreads. Additionally, they include receivables resulted from the disposal of loan portfolios and other transactions. The main part of these receivables relates to an unconditional consideration to be received at a predetermined future date while the remaining part relates to a contingent consideration to be received based on the achievement of predetermined collection targets. The valuation of the contingent consideration incorporates a range of unobservable inputs, hence the Group assesses the whole receivable to be classified in the lowest level of the fair value hierarchy.
- Equity securities at fair value through other comprehensive income and at fair value through profit and loss, which are not traded in active markets and their fair value is estimated using an income or market approach, for which the main inputs used are not market observable.

The table below presents a reconciliation of all Level 3 fair value measurements for the period ended 30 September 2022 and the year ended 31 December 2021, including realized and unrealized gains/(losses) included in the "Income Statement" and "Statement of Other Comprehensive Income".

Transfers into or out of Level 3

The Group conducts a review of the fair value hierarchy classifications on a quarterly basis.

For the period ended 30 September 2022 and the year ended 31 December 2021, transfers from Level 2 into Level 3 include derivative financial instruments for which the bilateral CVA is significant to the base fair value of the respective instruments. Transfers from Level 3 into Level 2 include derivative financial instruments for which the bilateral CVA is no longer significant to the base fair value of the respective instruments.

Movement of Level 3 financial instruments

Group	2022		
	Net derivative financial instruments	Investment securities at FVTOCI	Mandatorily at FVTPL
Balance at 1 January	28	26	354
Gain/(loss) included in Income Statement	(100)	-	19
Gain/(loss) included in OCI	-	1	-
Purchases/Additions	-	27	193
Settlements	-	-	(53)
Transfer into/(out of) level 3	(15)	-	-
Balance at 30 September	(87)	54	513

Group	2021		
	Net derivative financial instruments	Investment securities at FVTOCI	Mandatorily at FVTPL
Balance at 1 January	13	26	78
Gain/(loss) included in Income Statement	16	-	7
Purchases/Additions	-	-	296
Settlements	(1)	-	(27)
Balance at 31 December	28	26	354

For the period ended 30 September 2022, changes in unrealised gains/(losses) included in the income statement of financial instruments measured at fair value using significant unobservable inputs (Level 3), relate to financial assets mandatorily at fair value through profit or loss, amounting to €7 million for the Group (31 December 2021: €(3) million), as well as to net derivative financial instruments amounting to €(20) million for the Group (31 December 2021: €18 million).

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Valuation Process and Control Framework

The Group has various processes in place to ensure that the fair values of its assets and liabilities are reasonably estimated and has established a control framework which is designed to ensure that fair values are validated by functions independent of the risk-taker. To that end, the Group utilizes various sources for determining the fair values of its financial instruments and uses its own independent functions to validate these results, where possible.

Fair values of debt securities are determined either by reference to prices for traded instruments in active markets, to external quotations or widely accepted financial models, which are based on market observable or unobservable information where the former is not available, as well as relevant market based parameters such as interest rates, option volatilities, currency rates, etc.

The Group may, sometimes, also utilize third-party pricing information, and perform validating procedures on this information to the extent possible or base its fair value on the latest transaction prices available, given the absence of an active market or similar transactions or other market observable inputs. All such instruments are categorized within the lowest level of fair value hierarchy (i.e. Level 3).

Generally, fair values of debt securities, including significant inputs on the valuation models are independently checked and validated by the Middle Office and Risk Management Function on a systematic basis.

Fair values of derivatives are determined by Management using valuation models which include discounted cash-flow models, option pricing models or other appropriate models. Adequate control procedures are in place for the validation of these models, including the valuation inputs, on a systematic basis. Middle Office and Risk Management functions provide the control valuation framework necessary to ensure that the fair values are reasonably determined, reflecting current market circumstances and economic conditions. Furthermore, over-the-counter derivatives are also compared on a daily basis with counterparties' valuations, under the daily collateral management process.

Market Valuation Adjustments

Counterparty credit risk-adjustments are applied to all over-the-counter derivatives. Own credit-risk adjustments are applied to reflect the Group's own credit risk when valuing derivatives. Bilateral credit-risk adjustments consider the expected cash flows between the Group and its counterparties under the relevant terms of the derivative instruments and the effect of the credit-risk profile of the counterparties on the valuation of these cash flows. Where appropriate, the Group takes into consideration the credit-risk mitigating arrangements, including collateral agreements and master netting arrangements, for the purpose of estimating own and counterparty credit risk valuation adjustments.

Quantitative Information about Level 3 Fair Value Measurements | 30 September 2022

Financial Instrument	Fair Value	Valuation Technique	Significant Unobservable Input	Range of Inputs	
				Low	High
Investment securities mandatorily at fair value through profit or loss	5	Price Based	n/a ¹	n/a ¹	n/a ¹
Interest Rate Derivatives	(88)	Discounted Cash Flows, Internal Model (for CVA/DVA)	Credit Spread	710 bps	784 bps
	(2)	Discounted Cash Flows	Constant Maturity Swap correlation between different tenors	72.80%	100.00%
Other Derivatives	1	Discounted Cash Flows, Internal Model (for CVA/DVA)	Credit Spread	710 bps	1075 bps
Investment Securities at fair value through other comprehensive income	54	Income and market approach	n/a ¹	n/a ¹	n/a ¹
Loans and advances to customers mandatorily at fair value through profit or loss	27	Discounted Cash Flows	Credit Spread	300 bps	300 bps
	480	Discounted Cash Flows	Credit Spread	n/a ²	n/a ²

¹ Equity securities at FVTPL and at FVTOCI include equity securities which are not traded in active markets. In the absence of an active market the fair value of these securities is estimated using a market or an income valuation approach. Given the bespoke nature of the valuation method in respect of each holding, it is not practicable to quote a range of unobservable inputs.

² The valuation of the contingent part of the receivables from the loan portfolio sales and other transactions, has been performed using a discounted cash flow methodology under the income approach and includes a wide range of unobservable inputs, for which is not practicable to quote a relevant range of unobservable inputs, for disclosure purposes.

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Quantitative Information about Level 3 Fair Value Measurements | 31 December 2021

Financial Instrument	Fair Value	Valuation Technique	Significant Unobservable Input	Range of Inputs	
				Low	High
Investment securities mandatorily at fair value through profit or loss	1	Discounted Cash Flows	Credit Spread	766 bps	766 bps
	6	Price based	n/a ¹	n/a ¹	n/a ¹
Interest Rate Derivatives	29	Discounted Cash Flows, Internal Model (for CVA/DVA)	Credit Spread	166 bps	488 bps
	(2)	Discounted Cash Flows	Constant Maturity Swap correlation between different tenors	72.80%	100.00%
Other Derivatives	1	Discounted Cash Flows, Internal Model (for CVA/DVA)	Credit Spread	352 bps	488 bps
Investment Securities at fair value through other comprehensive income	26	Income and market approach	n/a ¹	n/a ¹	n/a ¹
Loans and advances to customers, mandatorily at fair value through profit or loss	61	Discounted Cash Flows	Credit Spread	200 bps	650 bps
	286	Discounted Cash Flows	Credit Spread	n/a ²	n/a ²

¹Equity securities at FVTOCI include equity securities which are not traded in active markets. In the absence of an active market the fair value of these securities is estimated using a market or an income valuation approach. Given the bespoke nature of the valuation method in respect of each holding, it is not practicable to quote a range of unobservable inputs.

²The valuation of the contingent part of the receivables from the loan portfolio sales, has been performed using a discounted cash flow methodology under the income approach and includes a wide range of unobservable inputs, for which is not practicable to quote a relevant range of unobservable inputs, for disclosure purposes.

Sensitivity of Fair Value Measurements to Changes in Unobservable Inputs

For structured interest rate derivatives, a significant change in the correlation inputs (e.g. the degree of correlation between two different interest rates, or between interest rates and foreign exchange rates) would have a significant impact on the fair value of the individual instrument; however, the magnitude and the direction of the impact depends on whether the Group is long or short the exposure, among other factors. Due to the limited exposure that the Group has to these instruments, a reasonable change in the above unobservable inputs would not be significant to the Group. Additionally, interest rate derivatives include interest rate swaps for which the bilateral credit valuation adjustment is significant in comparison to their fair value. The counterparty credit-risk adjustment in these cases is mainly driven by the internal ratings of the counterparty. A reasonable increase in the credit spread of these entities would result in an insignificant change in the fair value of the Group's financial instruments.

Other derivatives include derivatives for which the bilateral credit valuation adjustment is significant in comparison to their fair value. In these cases, the counterparty credit risk adjustment is mainly driven by the internal ratings of the counterparty. A reasonable increase in the credit spread of these entities would result in an insignificant change in the fair value of the Group financial instruments.

For loans and advances to customers mandatorily measured at fair value through profit or loss, the valuation includes a parameter which is not observable in the market, i.e. the credit spread of the customer. A reasonable increase in the respective credit spreads used would not have a significant effect on their fair value for the Group.

The valuation of the contingent part of the receivables from sales of loan portfolios, mandatorily measured at fair value through profit or loss, includes a range of unobservable inputs. A reasonable change in the unobservable inputs used would not result in a significant change in the fair value of these receivables.

NOTE 19: Acquisitions, disposals and other transactions

Disposal of subsidiaries

Sale of Ethniki Hellenic General Insurance S.A.

On 24 March 2021, the Bank's Board of Directors approved the sale of the 90.01% out of 100.00% stake NIC and authorized the Bank's Management to proceed with the signing of the SPA with CVC on 26 March 2021.

On 31 March 2022, the Bank lost control of NIC and proceeded with the derecognition of its assets and liabilities due to the fact that at that date were fulfilled all the conditions agreed between NBG and CVC. The consideration, less costs to sell plus the fair value of investment retained in NIC, amounted to €314 million.

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As at
31 March 2022

Assets	
Due from banks	93
Financial assets at FVTPL	25
Loans and advances to customers	16
Investment securities	3,031
Deferred tax assets	53
Insurance related assets and receivables	702
Other assets	114
Total assets	4,034
Liabilities	
Debt securities in issue	175
Retirement benefit obligations	66
Insurance related liabilities	2,905
Other liabilities	573
Total liabilities	3,719
Net Assets derecognized	315

Gain on disposal of NIC

As at
31 March 2022

Consideration less costs to sell	288
Fair value of 9.99% investment retained in NIC	26
Net assets derecognized	(315)
Non-controlling interests	1
Cumulative exchange loss in respect of the net assets of NIC reclassified from equity to profit or loss	(4)
Cumulative gain on financial assets measured at FVTOCI in NIC reclassified from equity to profit or loss	38
Gain on disposal	34

The gain on disposal of €34 million at Group level is included in the profit/(loss) for the period from discontinued operations (see Note 10 "Assets and liabilities held for sale and discontinued operations").

Net cash inflow on disposal of NIC amounted to €142 million.

Sale of CAC Coral Ltd

On 16 October 2020, a sale and purchase agreement was signed with Bain Capital for the sale of a 100% stake in CAC Coral Ltd, which contains a portfolio of non-performing corporate, SME and consumer and mortgage loans.

On 15 July 2022, the transaction was concluded, after approval of the competent regulatory authorities. The consideration less costs to sell amounted to €73 million.

As at
15 July 2022

Assets	
Due from banks	1
Loans and advances to customers	77
Total assets	78
Liabilities	
Other borrowed funds	70
Other liabilities	1
Total liabilities	71
Net Assets derecognized	7

Notes to the Interim Financial Statements Group

Loss on disposal of CAC Coral Ltd

As at
15 July 2022

Consideration less costs to sell	73
Net assets derecognized	(7)
Transfer of loan to Bain Capital	70
Loss on disposal	(4)

The loss on disposal of €4 million at Group level is included in the profit/(loss) for the period from discontinued operations (see Note 10 “Assets and liabilities held for sale and discontinued operations”).

Net cash inflow on disposal of CAC Coral Ltd amounted to €72 million.

Other transactions

Establishment of Stopanska Leasing DOOEL - Skopje

On 24 February 2022, a wholly owned subsidiary of Stopanska Banka A.D. – Skopje, under the name of Stopanska Leasing DOOEL - Skopje was established. The total paid-in share capital amounted to MKD 15 million.

Establishment of NBG PAY Single Member S. A.

On 23 May 2022, a wholly owned subsidiary of the Bank, under the name of NBG PAY Single Member S.A. was established. The total paid-in share capital amounted to €125 thousand.

Notes to the Interim Financial Statements

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NOTE 20: Group companies

Subsidiaries	Country	Tax years unaudited	Group	
			30.09.2022	31.12.2021
National Securities Single Member S.A.	Greece	2016-2021	100.00%	100.00%
NBG Asset Management Mutual Funds S.A.	Greece	2016-2021	100.00%	100.00%
Ethniki Leasing S.A.	Greece	2011-2021	100.00%	100.00%
NBG Property Services Single Member S.A.	Greece	2016-2021	100.00%	100.00%
Pronomiouhos Single Member S.A. Genikon Apothikon Ellados	Greece	2011-2021	100.00%	100.00%
Ethniki Hellenic General Insurance S.A. ⁽³⁾	Greece	-	-	100.00%
KADMOS S.A.	Greece	2011-2021	100.00%	100.00%
DIONYSOS S.A.	Greece	2011-2021	99.91%	99.91%
EKTENEPOL Construction Company Single Member S.A.	Greece	2011-2021	100.00%	100.00%
Mortgage, Touristic PROTYPOS Single Member S.A.	Greece	2011-2021	100.00%	100.00%
Hellenic Touristic Constructions S.A.	Greece	2011-2021	78.24%	78.24%
Ethniki Ktimatikis Ekmetalefsis Single Member S.A.	Greece	2011-2021	100.00%	100.00%
Ethniki Factors S.A.	Greece	2016-2021	100.00%	100.00%
I-Bank Direct S.A. ⁽¹⁾	Greece	2016-2021	100.00%	100.00%
Probank Leasing S.A. ⁽²⁾	Greece	2011-2021	100.00%	100.00%
NBG Insurance Brokers S.A.	Greece	2016-2021	100.00%	100.00%
NBG PAY S.M.S.A ⁽⁷⁾	Greece	-	100.00%	-
NBG Malta Holdings Ltd ⁽⁴⁾	Malta	2006-2021	100.00%	100.00%
NBG Malta Ltd ⁽⁴⁾	Malta	2005-2021	100.00%	100.00%
ARC Management Two EAD (Special Purpose Entity)	Bulgaria	2016-2021	100.00%	100.00%
Bankteco E.O.O.D.	Bulgaria	2016-2021	100.00%	100.00%
NBG Leasing S.R.L.	Romania	2017-2021	100.00%	100.00%
S.C. Garanta Asigurari S.A. ⁽³⁾	Romania	-	-	94.96%
ARC Management One SRL (Special Purpose Entity)	Romania	2013-2021	100.00%	100.00%
Stopanska Banka A.D.-Skopje	North Macedonia	2014-2021	94.64%	94.64%
Stopanska Leasing DOOEL Skopje ⁽⁵⁾	North Macedonia	-	94.64%	-
NBG Greek Fund Ltd	Cyprus	2017-2021	100.00%	100.00%
National Bank of Greece (Cyprus) Ltd	Cyprus	2012-2021	100.00%	100.00%
National Securities Co (Cyprus) Ltd ⁽¹⁾	Cyprus	-	100.00%	100.00%
NBG Management Services Ltd	Cyprus	2017-2021	100.00%	100.00%
Ethniki Insurance (Cyprus) Ltd ⁽³⁾	Cyprus	-	-	100.00%
Ethniki General Insurance (Cyprus) Ltd ⁽³⁾	Cyprus	-	-	100.00%
National Insurance Agents & Consultants Ltd ⁽³⁾	Cyprus	-	-	100.00%
CAC Coral Limited ⁽⁶⁾	Cyprus	-	100.00%	100.00%
NBG Asset Management Luxemburg S.A.	Luxembourg	2021	100.00%	100.00%
NBG International Ltd	U.K.	2003-2021	100.00%	100.00%
NBGI Private Equity Ltd ⁽¹⁾	U.K.	2003-2021	100.00%	100.00%
NBG Finance Plc	U.K.	2003-2021	100.00%	100.00%
NBG Finance (Dollar) Plc ⁽¹⁾	U.K.	2008-2021	100.00%	100.00%
NBG Finance (Sterling) Plc ⁽¹⁾	U.K.	2008-2021	100.00%	100.00%
NBG International Holdings B.V.	The Netherlands	2021	100.00%	100.00%

Notes:

⁽¹⁾ Companies under liquidation.

⁽²⁾ Probank Leasing S.A., has been reclassified as Non-current assets held for sale (See Note 10 "Assets and liabilities held for sale and discontinued operations").

⁽³⁾ The disposal of Ethniki Hellenic General Insurance S.A. and its subsidiaries, was completed on 31 of March 2022.

⁽⁴⁾ In October 2021, the Bank decided to cease its operation in Malta through its subsidiary NBG Bank Malta Ltd and from 31 August 2022, the subsidiaries are under liquidation. NBG Malta Limited, formerly known as NBG Bank Malta Limited surrendered its banking license on 11 August 2022 and subsequently placed into liquidation.

⁽⁵⁾ Entity was established on 24 February 2022.

⁽⁶⁾ The disposal of CAC Coral Ltd was completed on 15 of July 2022.

⁽⁷⁾ Entity was established on 23 May 2022.

The Group's equity method investments are as follows:

Name of associate	Country	Tax years unaudited	Group	
			30.09.2022	31.12.2021
Social Security Funds Management S.A.	Greece	2016-2021	20.00%	20.00%
Larco S.A.	Greece	2011-2021	33.36%	33.36%
Eviop Tempo S.A.	Greece	2016-2021	21.21%	21.21%
Teiresias S.A.	Greece	2011-2021	39.93%	39.93%
Planet S.A.	Greece	2016-2021	36.99%	36.99%
Pyrrichos Real Estate S.A.	Greece	2011-2021	21.83%	21.83%
SATO S.A.	Greece	2016-2021	23.74%	23.74%
Olganos S.A.	Greece	2011-2021	33.60%	33.60%
Perigenis Business Properties S.A.	Greece	2021	28.50%	28.50%

NOTE 21: Ukraine crisis

On 24 February 2022, Russia invaded Ukraine where in addition to the humanitarian crisis it has caused in the region, it has had negative economic consequences for the global economy mainly through higher energy and commodity prices that have fuelled higher inflation which has produced weaker confidence in households and business. The extent of these effects will depend to a great extent on how the conflict evolves. The invasion also escalated tensions between Russia and the U.S., NATO, the EU and the U.K. The US has imposed and is likely to impose material additional, financial and economic sanctions and export controls against certain Russian organizations and/or individuals, with similar actions implemented by the EU and the U.K. and other jurisdictions. In 2022 the U.S., the EU and the U.K., each imposed packages of financial and economic sanctions that, in various ways, constrain transactions with numerous Russian entities and individuals; transactions in Russian sovereign debt; investment, trade and financing to and from certain regions of Ukraine.

The Group has taken all necessary measures to comply with sanctions imposed by the competent authorities. Management is closely monitoring the developments and assessing periodically the impact that these may have on the Group's operations and financial position. The Group has an insignificant exposure in any positions in securities, interbank transactions (secured or unsecured), derivatives, or commercial transactions, related to Russia or Ukraine, or to the Ruble, or with any Bank or subsidiary that is domiciled in these countries.

The Group also examined indirect exposure through its corporate loan portfolio. Corporate clients that were analysed had one of the following characteristics:

- Business Activity: Companies that sell their products/services in the affected countries or have local presence through subsidiaries/branches
- Suppliers: Companies with key suppliers in the affected countries
- Shareholders: Key shareholders or final beneficiary or other key stakeholder is of Russian nationality/citizenship

As a result of the Ukrainian crisis, the expected impact from first order effects on the underlying obligors, that meet the above criteria, was deemed immaterial.

The Group also continuously invests in infrastructure to prevent, detect, and mitigate cyber threats. NBG already has in place a robust framework supported by experienced staff and appropriate IT infrastructure to minimize the probability of a cyber intrusion. From the onset of the crisis, NBG has proactively augmented this framework with a significant number of preparedness and security enhancement actions which will help reduce the impact of any such attacks.

For further information on the effect of the Ukrainian crisis see Note 2.2 *"Going-Concern", Macro-Economic Developments*.

For a discussion on the effect on forward looking information from the conflict in Ukraine see Note 2.4 *"Critical judgements and estimates", Forward- looking information*.

NOTE 22: Events after the reporting period

There are no events after the reporting period.