# ANNUAL REPORT 2011



## FINANCIAL HIGHLIGHTS

Profit & loss account data (€ millions)	2011	2010	2009
	Proforma*		
Net interest income	3,843	4,148	3,966
Net fee & commission income	494	610	660
Earned insurance premia net of claims & commissions	147	76	96
Net trading income/(loss) & results from investment securities	(28)	(138)	428
Net other income	(84)	(55)	73
Total operating income	4,372	4,641	5,077
Total operating expenses	(2,541)	(2,510)	(2,493)
Operating profit/(loss) before provisions	1,831	2,131	2,584
Credit provisions	(2,030)	(1,365)	(1,041)
Provisions for claims on the Greek Government not included in PSI+	(674)	-	-
Other provisions & impairment charges	(735)	(87)	(263)
Profit/(loss) before tax	(1,608)	679	1,280
Taxes	63	(197)	(289)
Profit attributable to minority interests	(19)	(35)	(41)
Non-cash charges	(30)	(41)	(27)
Attributable income (before PSI)	(1,594)	406	923
Impairment of Greek Government Bonds due to PSI+ (after tax)	(10,750)	-	-
Attributable income	(12,344)	406	923
Balance sheet data (€ millions)			
Due from banks (net)*	11,536	3,321	3,708
Loans & advances to customers (net)	71,496	77,262	74,753
Investment securities & financial assets	13,372	22,090	20,380
Other assets	17,366	18,072	14,553
Total assets	113,770	120,745	113,394
Due to banks	34,108	29,899	21,643
Due to customers	59,544	68,039	71,194
Debt securities in issue & other borrowed funds	3,440	4,432	3,085
Other liabilities	10,501	8,720	7,644
Total shareholder equity*	6,177	9,655	9,828
Total equity & liabilities	113,770	120,745	113,394

<sup>\*</sup> The proforma figures include the recapitalisation by the Hellenic Financial Stability Fund due to the PSI+. Before any proforma adjustments, the figures for Due from banks (net), Total assets and Total shareholder equity stood at  $\[ \le \]$ 4,636,  $\[ \le \]$ 106,870 and  $\[ \le \]$ 723) million respectively and are thus reported in the Financial Statements 2011.

#### Key figures & ratios

, •			
Earnings (losses) per share (€)	(12.93)	0.46	1.72
Dividend per ordinary share (€)	-	-	-
Cost : Income	58%	54%	49%
Net interest margin	3.68%	3.92%	4.12%
Tier I CAD ratio**	7.2%	13.1%	11.3%
Total CAD ratio**	8.3%	13.7%	11.3%
Staff numbers (year end)	34,698	36,866	36,314

<sup>\*\*</sup> The proforma ratios include the recapitalisation by the Hellenic Financial Stability Fund due to the PSI+. Reported Tier I and Total CAD ratios, before any proforma adjustments, stood at (3.7)% and (2.6)% respectively.

Credit ratings (end of May 2012)	Long-term	Short-term		
Moody's	Caa2	NP		
Standard & Poor's	CCC	С		
Fitch Ratings	CCC	С		

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### LETTERS TO SHAREHOLDERS

#### Dear Shareholder,

There is no doubt that Greece is undergoing its greatest ordeal since the Second World War. Our country is now at a crucial crossroads, at which it will have to take critical decisions and find solutions that will determine its future, whether it will remain a member of the community of advanced European states. The decisions we have to take as a country are not only about fiscal reform, but also about whether our economy can modernize and return to a trajectory of sustainable growth so as to lay the foundations for strong job creation and conditions that will benefit society as a whole. An effective response to the crisis can only be forthcoming if new and effective institutions are put in place alongside strong, modern productive structures. Such changes require systematic planning, collective action, resolve and boldness. Despite the obstacles that lie before us, we believe that Greece is capable of rising to the challenges.

The Greek banking system is labouring under the strain of the unprecedented fiscal crisis in the country, as well as the wider European sovereign debt crisis. The sharp contraction in deposits and declining loan repayment capacity due to reduced incomes in thousands of households and businesses have taken a heavy toll on the liquidity of the banking system. Despite these problems, NBG continued its efforts—what was within its capacity—to channel support to households and businesses, both large and small, that are struggling to stay afloat.

Another major ordeal for the banking system concerns the write-downs in the banks' Greek government bond holdings as a result of the PSI, causing them to post losses of many billions of Euros. The losses stemmed primarily from the PSI and to a lesser extent from credit risk, though the latter may be recouped through future operating profitability. The new fiscal consolidation programme includes vital support for the recapitalisation of the banking system—indeed, the first and most important funding package has already been released. The final amount of the recapitalisation package as well as the terms and conditions accompanying it are due to be announced soon. The continuation of support for banks, coupled with signs of political progress on the European level and the restoration of stability in Greece, should contribute to a gradual improvement in the economic climate and the recovery of confidence in the banking system.

In 2011, NBG continued unabated its efforts—begun in 2010—to further fortify its CAR, push down its operating costs, and generally streamline its operations. In 2012, it is continuing its effort to reinforce its capital position, rationalise

costs, and support its customers by implementing a range of actions in the framework of its key strategic goals.

Within this highly adverse environment and against a backdrop of extreme uncertainty, NBG continues to be confronted by unprecedented challenges. Yet it will rise to these challenges, fully aware of its institutional role as the largest financial institution in the country. As in the past, so too now NBG—guided by the interests of its diverse shareholders, depositors and customers in general—will again lead in the national effort to support the economy and place our country on a stronger footing on the regional and global economic stage.

Vassilios Rapanos

Chairman of the Board

#### Dear Shareholder.

The Greek banking system is reeling from the impact of the massive losses incurred by the PSI and the persistent recession—for the fourth consecutive year—which, since the 2nd half of 2011, has pushed loan impairments to levels such that the relative provisions are absorbing almost all our operating profitability.

The NBG Group will stick to its strategy that is geared to the conditions imposed by this unprecedented crisis. The results yielded by this strategy can be summed up as follows:

- Additional regulatory capital raising in the past two years amounting to €3.5 billion (before the €7.4 billion capital injection from the Hellenic Financial Stability Fund in May 2012).
- A reduction in operating expenses in Greece of €250 million over the past two years—efforts continue unabated in this area.
- Ongoing application of credit policy that aims at assisting, via refinancing arrangements, viable businesses and households and at supporting weaker social groups afflicted by the crisis.
- Commitment to cleaning up the balance sheet by systematically pursuing a policy of increased provisions for credit risk. This strategic choice has been vindicated by the fact that NBG will not need additional capital in light of the results of the tests carried out on its loan portfolio by BlackRock Solutions. Specifically, between Q4.2009 and Q1.2012 NBG formed provisions of €5.3 billion for Greece and €6.2 billion for the Group as a whole.

In the phase ahead, NBG will continue its efforts to enhance its capital position, limiting as far as possible the need for government support, by implementing a series of actions under its key strategic objectives:

- a) Further implementation of our Capital Raising Plan, articulated in terms of specific milestones that have been submitted to the Bank of Greece and approved as viable and reliable. The Plan provides for the sale of a minority stake in Finansbank, exploration of the possibility of selling a minority stake in the new subsidiary (currently under establishment) that is planned to incorporate the Group's units in the Balkans, the sale of non-core assets such as Astir Palace Hotel complex, and optimal management of the bank's other assets and liabilities. These actions serve our overriding objective of keeping NBG as the main pillar of stability in the domestic banking system, capable of attracting the private capital needed for the recapitalisation process.
- b) <u>Maintaining liquidity</u>: Despite the cumulative 35% decline in deposits in Greece since the end of 2009, the Bank's loan book continues to be funded by deposits, with the loan-to-deposit ratio standing at 105% for Greece and 111% for the Group as a whole, according to 1st guarter 2012 data.
  - As a result of the Group's concerted efforts, the funding gap of our SE Europe units has narrowed by €1.3 billion over the past two years, so that it now stands at insignificant levels, while there has also been further substantial improvement in the loan-to-deposit ratio in Turkey and SE Europe.

- c) Strengthening the balance sheet: Because of the sharp deterioration in the quality of the loan portfolio, NBG formed provisions of €4.0 billion in 2011 (triple those of 2010), so as to effectively shield the Group. Accumulated provisions for loan impairments amounted to €7.1 billion at the end of 2011, while in Q1.2012 further provisions of €559 million were made.
- d) <u>Cost containment</u>: Systematic efforts to reduce all cost factors have pushed down the Bank's operating expenses by 15% cumulatively for 2010 and 2011. Specifically, in Greece in 2011 payroll expenses declined by 8% and general expenses by 9% year on year. In SE Europe, the reduction over the same period was of the order of 5%. Significant cost-cutting is planned during the rest of 2012 as well as in the years ahead.

Despite the general uncertainty that has amplified problems lately, I am optimistic that these problems will soon be overcome. We are all convinced that only by continuing the reform process and remaining within the euro area can a successful outcome of the national effort to restore fiscal stability, regain competitiveness, exit the crisis and establish the prospect for renewed, sustainable growth be guaranteed.

I would like to take this opportunity to express my gratitude to our shareholders, customers and staff in Greece and abroad who, due to their undiminished trust in the largest bank in the country, have been supporting our efforts to rise to the challenges of the escalating economic crisis as it impacts on society as a whole, so that we may break the self-fuelling cycle of recession and lay firm foundations on which to build the country's economic recovery.

Apostolos Tamvakakis

Chief Executive Officer

### **BOARD OF DIRECTORS**

Vassilios Rapanos

Chairman of the Board, Professor at the University of Athens (non-executive member)

Apostolos Tamvakakis

Chief Executive Officer (executive member)

**EXECUTIVE MEMBERS** 

Alexandros Tourkolias

Deputy CEO

Leonidas Theoklitos

Deputy CEO

Anthimos Thomopoulos

Deputy CEO

#### NON-EXECUTIVE MEMBERS

Ioannis Giannidis

Professor at the University of Athens School of Law, and Legal Counsellor

Ioannis Panagopoulos

Employees' Representative, Chairman of the General Confederation of Greek Workers

Avraam Triantafyllidis

Employees' Representative

#### INDEPENDENT NON-EXECUTIVE MEMBERS

H.E. the Metropolitan of Ioannina

Theoklitos

Stefanos Vavalidis

Member of the Board of the European Bank for Reconstruction & Development

George Zanias (resigned in May 2012)

Economist, Professor at the Athens University of Economics & Business,

President of the Greek Association of Chartered Valuers

Spyridon Theodoropoulos

CEO, Chipita SA

Alexandra Papalexopoulou-Benopoulou

Member of the Board of Titan Cement SA

Petros Sabatacakis

**Economist** 

Marily Frangista

Managing Director, Franco Compania Naviera SA

REPRESENTATIVE OF THE HELLENIC REPUBLIC

Alexandros Makridis

Chairman of the Board & CEO of Chryssafidis SA

REPRESENTATIVE OF THE HELLENIC FINANCIAL STABILITY FUND (HFSF) Charalambos Makkas Economist

SECRETARY OF THE BOARD & BOARD COMMITTEES
Martha Pylioti
Attorney, LLM, NBG Legal Services Division

#### Notes:

The current Board, whose term expires in 2013, was elected by the extraordinary General Meeting of Shareholders held on 14 January 2010, with the exception of Mr. Alexandros Makridis who was appointed, under law 3723/2008, to the Board on 26 February 2009 as representative of the Hellenic Republic, and Mr. Avraam Triantafyllidis who was appointed on 18 March 2010 as a director in replacement of Mr. Alexandros Stavrou. The extraordinary General Meeting of Shareholders held on 26 November 2010 elected three executive members of the Board, Messrs. Alexandros Tourkolias, Anthimos Thomopoulos and Leonidas Theoklitos, who at the next Board meeting were elected Deputy Chief Executive Officers of the Bank. On 23 November 2010, Ms. Marily Frangista was elected member of the Board in replacement of Ms. Maria Sklavenitou, who had resigned as a director. Ms. Frangista's election was announced at the extraordinary General Meeting of Shareholders of the Bank held on 26 November 2010. Independent non-executive director Vassilios Konstantakopoulos passed away on 25 January 2011, and Mr.Spyros Theodoropoulos was elected to replace him on 14 April 2011. Mr.George Zannias resigned from his position as a director on 7 May 2012. On 11 June 2012, Mr.Charalambos Makkas was elected to the BoD as a representative of the Hellenic Financial Stability Fund (HFSF), according to L.3864/2010.

## NBG SENIOR MANAGEMENT

EXECUTIVE COMMITTEE
Chairman:Apostolos Tamvakakis – CEO

Members:

Anthimos Thomopoulos – *Deputy CEO* Leonidas Theoklitos – *Deputy CEO* Alexandros Tourkolias – *Deputy CEO* Omer Aras – *CEO*, *Finansbank* 

Secretary: Paul Mylonas – General Manager of Strategy & Governance

#### **GENERAL MANAGERS**

Andreas Athanassopoulos *Retail Banking* 

Andreas Vranas Human Resources

Dimitrios Dimopoulos Corporate Banking

Aristotelis Karytinos Group Real Estate

Agis Leopoulos\*
International Activities

Babis Mazarakis Chief Financial Officer

Michael Oratis Group Risk Management

George Paschas

Business Processes, IT & Purchasing

Marianna Politopoulou Group Retail Collections

Nelly Tzakou

Operations & Global Transaction Services

Leonidas Frankiadakis Treasury & Global Markets

<sup>(\*)</sup> Mr. Agis Leopoulos, Head of the Bank's International Activities, submitted his notice of resignation. By decision of the BoD, he was replaced by Mr. Petros Christodoulou in June 2012.

#### ASSISTANT GENERAL MANAGERS

Spyridon Asimopoulos
Assistant General Manager, Branch Network

Yiannis Balampanis
Assistant General Manager of Business Processes

Nikolaos Christodoulou Group CIO

Petros Fourtounis Group Chief Audit Executive

Dimitrios Frangetis
Chief Credit Officer

Panagiotis Goutakis
Assistant General Manager of Investment Banking

Ioanna Katzilieri-Zour Assistant General Manager Retail Banking

Spyridon Mavrogalos
Assistant General Manager of Finance & Operations

Telemachos Palaiologos

Assistant General Manager of Security

Theofanis Panagiotopoulos
Assistant General Manager of Corporate Banking

Dimitrios Vrailas
Assistant General Manager of Information Technology

#### **FINANCIAL REVIEW 2011**

For full-year 2011, the loss attributable to NBG Equity shareholders was €12,344.0 million, if losses (net of part of the tax benefit recognised) stemming from the Bank's involvement in the Greek sovereign debt exchange programme (PSI), the write-downs in claims on the Greek Government not included in PSI, and other extraordinary write-downs and impairments totalling €1,305.3 million net of tax, are taken into account. Excluding the said losses and impairments, loss attributable to NBG equity shareholders was €288.5 million.

The loss from the Group's involvement in the PSI amounted to €10,750.2 million net of the tax benefit recognised. The nominal value of the bonds held by the Group and included in the exchange programme amounted to €14,750.7 million. The implementation of the PSI led the Bank to write down claims on the Greek Government not included in the PSI by an amount of €752.7 million before tax. These claims include loans guaranteed by the Hellenic Republic and other claims.

In response to this difficult period for the Greek economy, the Group has implemented a series of measures designed to bring its business model in line with current economic circumstances. Specifically, we have strengthened our capital position through a €1 billion share capital raising in December 2011, the issue of redeemable preference shares (taken up in full by the Hellenic Republic), and the buyback of covered bonds and hybrid securities in January 2012 which generated a profit of €301.6 million; we have increased the allowances for impairment of loans and receivables; and we have made significant reductions in our operating expenses.

The Group's total CAR following the losses arising from the PSI and other write-downs was negative, at 2.6%. However, backed by the positive impact of the tender offer outlined in the previous paragraph and, above all, the state guarantee of a capital injection initially estimated at €6.9 billion from the Financial Stability Fund, the Total CAR stood at 8.3% at end 2011. It is important to note that the above-mentioned capital injection, which took place in the 2nd quarter of 2012, was for €7.4 billion.

Our cost-cutting efforts deserve special note. Operating expenses Group-wide were €2,370.8 million (before the impact of the one-off €169.9 million provision for employees SRI), a decline of 6% year on year, primarily due to the drastic reduction in operating expenses in Greece. Specifically, personnel expenses in Greece on a comparable basis, before the one-off €169.9 million provision for the employees statutory retirement indemnity ("SRI"), decreased by 8% year on year. General expenses and depreciation decreased by 9% year on year. Similarly operating expenses in SE Europe decreased by 3% over the same period.

Despite the drastic reduction in deposits and the sharp fall in economic activity, total lending in Greece has declined by just 3.5% on an annual basis.

The economic climate in Greece continues to be severely stressed (GDP down by 7.5% in Q4.2011), thus leading to deterioration in the quality of banks' loan books. Provisions for loans and advances to customers in 2011 persisted at high levels, €2,664.5 million, creating a balance of allowances for impairment on loans and advances to customers of €7.1 billion. As a result of the Group's conservative provisions policy, the +90 dpd coverage ratio remained at 56%, before, of course, taking into consideration the various forms of associated collateral.

The effective implementation of our strategy to enhance the liquidity of the Group's subsidiaries abroad is underscored by the 22% increase in deposits in Turkey and the stabilization of deposits in SE Europe, within a harsh economic environment.

Finansbank's profits in 2011 declined by 8% year on year to TL849 million (€365 million).

In 2011, Finansbank's total lending amounted to TL36.8 billion (€15.1 billion), up 16% year on year. Despite the growth in lending activity, Finansbank's CAR stood at the robust level of 17.6%, the highest among its peers.

The profit for the period from the Group's SE Europe operations in 2011 totalled €3 million, compared with

€75 million in 2010, as deleveraging continued and led to a reduction in net interest income. Despite the 3% reduction in operating expenses, which pursued a downward course for the second year running, preprovision profit declined by 37% to €174 million, compared with €275 million in 2010.

#### **NBG SHARE**

Persistent uncertainty regarding progress in the country's public finances and the lack of confidence among domestic and international investors caused share prices to post major losses in 2011. NBG's share price displayed high volatility, peaking at €8.1 on 21 February 2011 and reaching a low of €1.4 on 1 November 2011, while its average annual price was €4.4 and its closing price at 30 December 2011 was €1.6. The annual standard deviation (ASD) of the NBG share price was 5.4% compared with 3.8% in 2010. The ASD of the Greek banking sector rose significantly to 4.8%, from 3.8% in 2010, while the ASD of the GI-ATHEX index presented only a marginal change (2.4% in 2011, 2.2% in 2010).

The total trading volume of the NBG share amounted to €4.7 billion, substantially lower than the previous year (€11.1 billion), equivalent to 22.6% of the annual trading volume of the domestic capital market and 44.7% of the annual volume of transactions of the domestic banking sector. NBG's market capitalization at 31 December 2011 was €1.5 billion, while its average market capitalization over the year was €4.2 billion. Note that NBG's share of the total market capitalization of the Greek banking sector increased by 9 percentage points, from 34.9% in 2010 to 43.9% in 2011. Last, NBG's share of the total capitalization of the Greek stock market stood at 5.8% in 2011.

The stock's liquidity ratio (the ratio of the value of the stock's total trading volume to average capitalisation) for 2011 stood at 112%, far above the corresponding ratio (just 47%) for the GI-ATHEX.



**TABLE 1** 

NBG STOCK MARKET DATA (1)					
	2011	2010	2009	2008	2007
Year-end price (€)	1.6	6.1	15,4	10.4	35.5
Year high (€)	8.1	17.7	24.0	35.9	36.2
Year low (€)	1,4	6.0	6.9	8.8	26.5
Mean price for the year (€)	4.4	9.6	15.0	22.8	32.1
Yearly standard deviation for NBG share price (%)	5.4	3.8	4.0	4.4	1.7
Yearly standard deviation for banking sector (%)	4.8	3.4	3.4	3.4	1.3
Yearly standard deviation for ATHEX (%)	2.4	2.2	2.1	2.5	1.0
NBG market capitalization at year end (E billions)	1.5	5.8	11.0	6.6	22.3
NBG-to-ATHEX market capitalization ratio at year end (%)	5.8	10.7	17.1	9.6	11.4
NBG-to-banking sector capitalization ratio at year end (%)	43.9	34.9	35.4	31.1	26.3
Annual trading volume (E billions)	4.7	11.1	11.6	14.9	15.8
NBG-to-ATHEX trading volume ratio (%)	22.6	31.7	26.2	19.2	13.0
NBG-to-banking sector trading volume ratio (%)(2)	44.7	52.0	41.4	38.8	29.6
Annual liquidity ratio: NBG (%)	112.0	155.1	113.4	103.6	78.2
Annual liquidity ratio: banking sector (%)	87.4	99.6	96.6	77.7	64.4
Annual liquidity ratio: ATHEX (%)	46.5	54.2	70.4	62.7	65.7

Sources: ATHEX, Bloomberg, NBG calculations

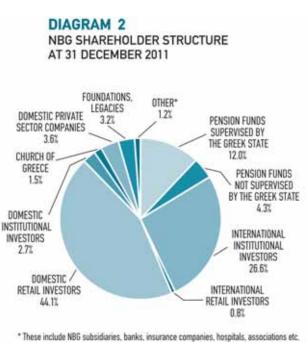
<sup>(1)</sup> For ease of comparison, share prices have been adjusted to reflect capital increases of the past 5 years.
(2) Ratio of annual trading volume to average capitalisation.

#### SHAREHOLDER STRUCTURE

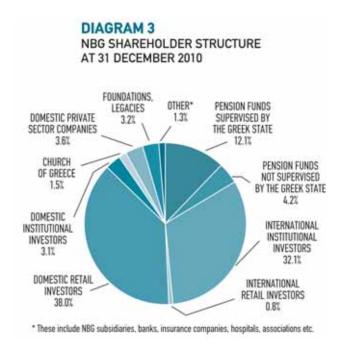
NBG's share capital at 31 December 2011 was divided into: a) 956,090,482 ordinary shares of a nominal value of €5 each, b) 25,000,000 redeemable non-voting preference shares without cumulative dividend rights, of a nominal value of €0.30 each, and c) 270.000.000 redeemable preference shares, under Law 3723/2008, of a nominal value of €5 each, compared with 70,000,000 redeemable preference shares, under Law 3723/2008, a year earlier.

The Bank carried out a €1 billion share capital raising by issuing 200,000,000 preference shares under Law 3723/2008 of a nominal value of €5 each, pursuant to a decision of the Extraordinary General Meeting of Shareholders held on 22 December 2011. The amount raised was fully subscribed by the Hellenic Republic, through the transfer by the latter to the Bank of Government bonds of equivalent value.

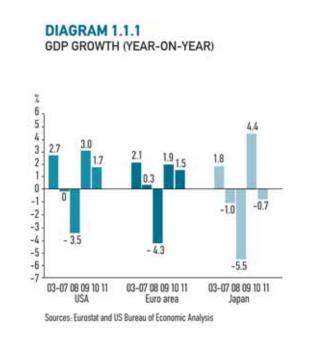
NBG has a widely dispersed shareholder base, spread across approx. 220,000 retail and institutional shareholders. No single shareholder owns more than 3.5% of the share capital. NBG's shareholder data indicate (DIAGRAM 2) that, as at 31 December 2011, 27.4% of its share capital was owned by international institutional and retail investors, compared with 32.9% a year earlier (DIAGRAM 3).

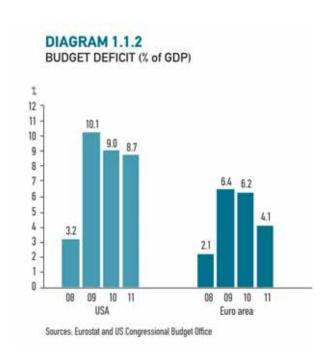


The percentage shareholding of domestic retail investors increased substantially from 38.0% at the end of 2010 to 44.1% at the end of 2011.



# SECTION FINANCIAL ENVIRONMENT





#### 1.1 INTERNATIONAL DEVELOPMENTS

In 2011, global economic activity slowed to an annual rate of 3.9%, from 5.3% in 2010, mainly due to growth deceleration in the US and Japan. Specifically, the US economy slowed to 1.7% in 2011, from 3.0% in 2010, while the Japanese economy contracted, posting negative growth of -0.7% in 2011 compared with positive growth of 4.4% in 2010, due to the disastrous Tohoku earthquake and the ensuing nuclear accident. The euro area's economic growth rate declined by less compared with other major economies, to 1.5% in 2011, from 1.9% in 2010 (DIAGRAM 1.1.1), although there was wide variation between the peripheral and the core countries. On the other hand, emerging economies posted growth of 6.2% in 2011, slightly below the 7.5% of 2010.

In mid 2011, the debt crisis took on wider dimensions in the euro area, affecting key—in terms of systemic risk—countries such as Italy and Spain.

International oil prices pursued an upward course in 2011, due to increased geopolitical risk as well as sustained demand from the emerging economies. Accordingly, by the end of the year the price of crude oil topped USD99 per barrel, up 8% from USD91 per barrel a year earlier. In terms of average price over the whole year, oil gained a substantial 20%, rising to USD95 per barrel from USD80 per barrel in 2010. In contrast with oil, the prices of food and industrial

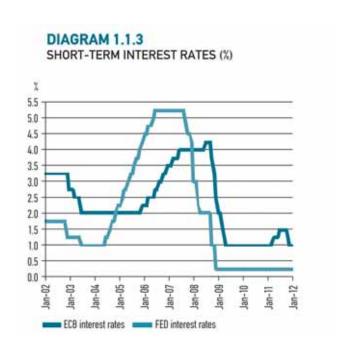
metals fell, mainly as a result of the global economic downturn. With inevitable fallout from energy prices, there was an increase in the overall rate of inflation in 2011, from 1.5% to 2.7% in the developed economies, and from 6.1% to 7.1% in the emerging economies. Core inflation (which excludes the particularly volatile component of food and energy prices) also rose slightly in 2011, though remaining at entirely manageable levels, mainly because of the widening output gap and high unemployment in the developed economies.

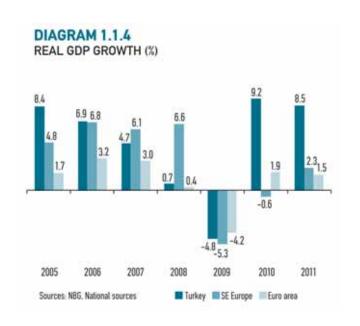
Central banks stepped up their measures to stimulate liquidity, keeping policy rates at record lows. In the US, the Fed completed the programme of USD600 billion of US Treasury purchases. In June and September 2011, the Fed initiated its "Operation Twist" monetary process. In the euro area, the ECB initially increased its policy rate by 25 bps both in mid April and mid July to 1.50% in order to stabilise conditions in the money market. Thereafter, however, the escalating sovereign debt crisis and mounting fears of a deterioration in economic activity led the ECB to cut its policy rate to 1.00% by the end of the year. Moreover, in August the ECB reactivated its Securities Markets Programme, purchasing a cumulative €140 billion by year end (reaching a total of €212 billion since May 2010); it also announced a new €40 billion covered bond-buying programme lasting through to October 2012; and in December 2011 it initiated its first (of two) 3-year unlimited liquidity-providing tender to the banking system. Furthermore, in November 2011 euro area finance ministers agreed to extend the funding capacity and flexibility of the European Financial Stability Facility (EFSF). Last, in 2011 the US budget deficit was slightly lower at 8.7% of GDP, from 9.0% in 2010, while the euro area budget deficit declined markedly to 4.1%, from 6.2% in 2010. (DIAGRAM 1.1.2).

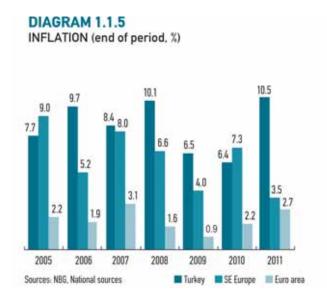
#### Southeast Europe (SEE-5) and Turkey

In 2011, the macroeconomic profile of the SEE-5 (Albania, Bulgaria, FYROM, Romania and Serbia) and Turkey presented both downside and upside pictures.

The SEE-5 experienced a positive rebound in economic growth (2010: -0.6%, 2011: 2.3%). While inflation eased markedly and external imbalances declined, the banking sector continued to perform weakly. Domestic demand was lacklustre in the SEE-5, reflecting inter alia a tight income and fiscal policy, as well as modest











credit expansion. Accordingly, GDP posted growth of just 2.3% in 2011, in the wake of two years of recession.

By contrast, the Turkish economy continued to grow rapidly—on the back of strong domestic demand—and the banking sector continued to expand, while external imbalances widened and inflation peaked at high levels. For the second consecutive year, domestic demand posted double-digit growth, reflecting ongoing high credit expansion sustained by the loose monetary policy implemented by the central bank and the improved quality of banks' loan portfolios. Accordingly, GDP continued to post impressive growth, of 8.5%, compared with 9.2% in 2010.

The current account deficit—the Achilles' heel of these economies—presented a different picture in each country, reflecting inter alia the differing conditions in domestic demand and external funding among the SEE-5 and Turkey. The significant adjustment of external imbalances seen in 2009, in the context of the global economic and banking crisis, was reversed in 2011 in the SEE-5, with the external deficit stabilising at sustainable levels (4.5% of GDP for the second consecutive year in 2011 compared with 6% in 2009). In Turkey, the current account deficit widened yet further to particularly high levels (10% of GDP in 2011, from 6.4% in 2010 and 2.3% in 2009).

Nevertheless, plugging the external funding gap did not generate particular problems for either the SEE-5 or Turkey. In the case of the SEE-5, this was due to the support from International Financial Institutions (IFIs: IMF, World Bank, EBRD, EIB) and, in the case of Romania, the EU. Note that Romania disbursed €1.35 billion (1% of GDP) from the EU and €0.9 billion (0.7% of GDP) from the IMF. In addition, Serbia and the Former Yugoslav Republic of Macedonia disbursed €0.05 billion (0.2% of GDP) and €0.22 billion (3% of GDP). respectively, from the IMF. In the case of Turkey, large short-term capital inflows (high investment portfolio inflows and repatriation of assets that had been held abroad) served to cover the external funding gap. This led to a limited increase in the foreign exchange reserves of the SEE-5 and a slight reduction in such reserves in Turkey.

Inflation decelerated in the SEE-5 to 3.5% in December 2011, from 7.3% in December 2010, mainly because of favourable food prices and the strong impact of the comparison base (offsetting the impact of the 5 percentage point increase in VAT in Romania in mid 2010).

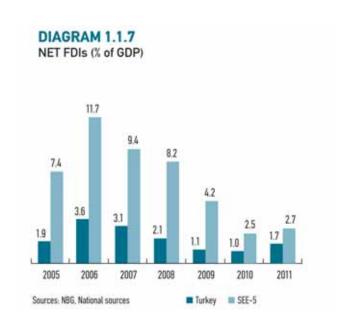
By contrast, in Turkey inflation accelerated to 10.5% from the record low of 6.4% posted in December 2010, in part reflecting the sharp increase in food prices and the feed-through of the substantial depreciation of the domestic currency.

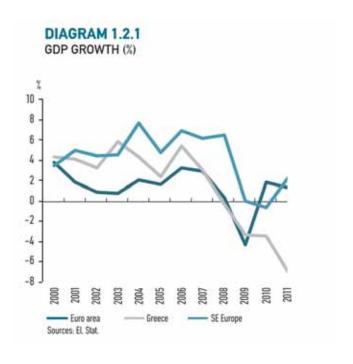
#### 1.2 THE GREEK ECONOMY

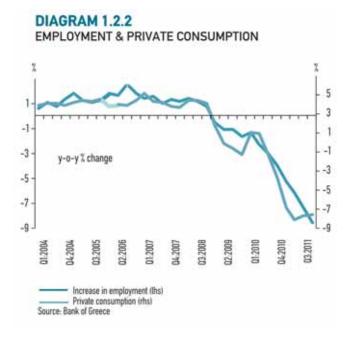
The Greek economy continued to face immense macroeconomic challenges in 2011, as mounting uncertainty about the sustainability of the sovereign debt—which persisted even after the decision of the European Summit in July to proceed with a moderate restructuring of Greek debt—and the imposition of additional austerity measures to ameliorate slippages in the 2011 budget implementation during the second half of the year amplified recessionary pressures, creating a self-fuelling vicious circle of weakening economic sentiment, declining liquidity and reduced private spending. This adverse spiral posed additional challenges to the fiscal adjustment effort by eroding yet further the tax base and increasing social spending needs.

More specifically, two years after signing the first support package (May 2010) for the Greek economy, the macroeconomic challenges faced by the country remain formidable. GDP in 2011 contracted by 6.9% (in constant price terms), following declines in activity of 3.5% in 2010 and 3.2% in 2009. At the same time, the pace of fiscal adjustment has weakened, with the fiscal deficit registering a drop of about 1.3 pps to circa 9.1% of GDP (vs. an initial adjustment target of 2.5% of GDP and actual attained adjustment of 5.3% of GDP in 2010). as implementation delays and a deeper-thananticipated recession led to slippage from revenue targets. Domestic demand, which provides a view on the state of the tax base, shrank by 6.2% in nominal terms, causing government revenues to fall short of targets, though the shortfall was offset to a substantial degree by new budget measures and tighter primary spending control in H2.2011. Nevertheless, the cumulative reduction in the primary budget deficit over the two-year period 2010-11 is the biggest recorded for the euro area.

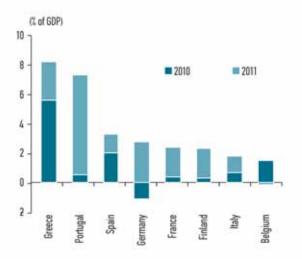
Further strengthening of recessionary pressures in H2.2011 reflects: i) mounting uncertainty as a result of











the escalating European sovereign debt crisis, with Greece as a focal point that fuelled a long drawn out debate about the country's ability to serve its very high level of sovereign debt and reverse its accumulated competitiveness losses; ii) further tightening of domestic liquidity conditions during 2011 as a result of continuing deposit contraction, which aside from coverage of financing needs of the private sector also reflected the re-emergence of capital flight and cash hoarding due to uncertainty against a backdrop of reduced incomes and increased tax obligations; and iii) the impact from the implementation of about 6.5% of GDP of new austerity measures in 2011 (80% of which were implemented in H2.2011), following 7.0% of GDP of measures in 2010. Accordingly, domestic demand contracted by 8.7% year on year, as private consumer spending fell by 7% and investment spending continued its free fall (down by 19.5%), declining to 15% of GDP from 22% in 2008. The main factors that served to brake the recessionary dynamic were the decline in imports (10.3%) and the recovery of the export sector, on the back of a strong tourist season and relatively strong manufacturing exports, which together explain the positive—approximately 2.5 pp—contribution of net exports to GDP growth in 2011. As a result, the current account deficit was reduced to single digits (9.8% in 2011 from 10.6% in 2010) although the high prices for energy and imported raw materials on the one hand, and the downward repricing of shipping freight services on the other, combined with the need for competitive pricing of tourism services. subtracted from the improvement in the external balance in nominal terms.

Against this backdrop, the labour market deteriorated further, with the average unemployment rate for 2011 climbing to 17.3% (20.7% in Q4.2011 on the basis of LFS data) from 12.5% in 2010, and employment contracting by an unprecedented 6.6% year on year. The recession has also taken an increasing toll on the stock of private sector wealth, with the cumulative fall in house prices—from their peak in 2008 through to Q4.2011—amounting to 17%. Headline inflation pressures are dissipating, with CPI inflation slowing to +3.3% year on year (+2.8% in Q4.2011), from +4.7% in 2010, while adjusted for the impact of tax increases and energy, average inflation was only +0.2% year on year in 2011, almost 1 pp below the euro area.

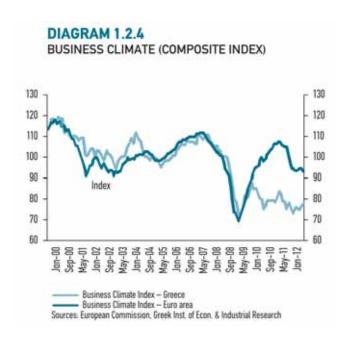
The successful completion of the unprecedented—in scale and complexity—final restructuring of the Greek debt (PSI) in April 2012, coupled with the agreement to launch a new Support Programme for the Greek economy for the period 2012-15, are landmarks in the

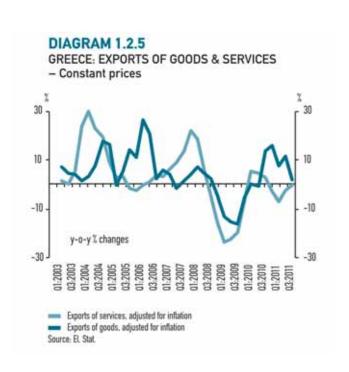
shaping of the economic prospects of the country. These developments, combined with a commitment to the European perspective of the country, should signal the beginning of a period of normalisation of economic conditions, providing precious breathing space for economic policy to marshal the additional fiscal and, in particular, essential growth-oriented reforms going forward.

The implementation of the PSI implies a significant reduction in the country's level of debt—particularly in the medium term—together with a significant reduction in annual debt servicing requirements due to the large reduction in the borrowing rates and a significant lengthening of the sovereign debt maturity profile (ranging 10-30 years). The PSI, which imposed deep haircuts on private debt holders, implies debt relief of about €105 billion and is accompanied by a reduction of the effective average cost of Greek debt servicing to approximately 3.2% per annum, from about 5% in 2011, through reduced coupons on new bonds and more favourable terms on official financing from the EU and the IMF. In this vein, the debt exchange lays the ground for a sustainable reduction of Greek debt to below 120% of GDP by 2020, and below 90% by 2030 (from 165% in 2011), with the expected debt trajectory being relatively robust even under more adverse macroeconomic conditions or outcomes of the programme's measures, compared with the baseline projections of the programme.

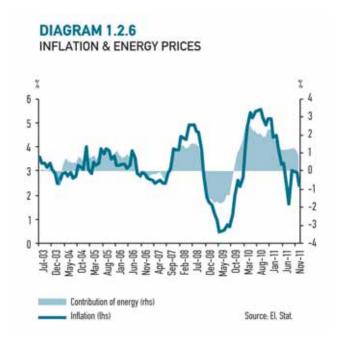
The Programme also provides a comprehensive strategy for recapitalising the banking system so as to enable it to recover some of the losses incurred as a result of the PSI and, on a second level, to repair some of the impact of the deep and protracted recession on loan book quality.

The Programme also includes a credible mix of fiscal measures—focused mainly on cuts in government spending—so as to return to a primary surplus of 1.8% of GDP in 2013 and around 4.5% for the period 2014-2020. This, alongside the determined pursuit of growth-enhancing structural reforms, forms the cornerstone of the new Programme. The adjustment process will also be based on successful completion of an ambitious privatisation agenda, adapted to the current juncture and the impact of the recession on asset valuations. Similarly, the aggressive structural reform agenda includes measures to increase fiscal efficiency (e.g. a new modern Tax law), strengthen Greece's institutional capacity (including an enhanced level of technical assistance by the EU) and improve efficiency of the labour market and product and service





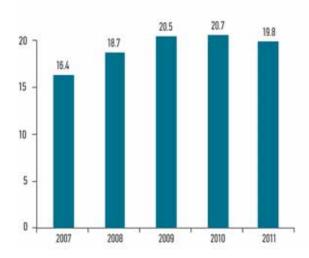
# SECTION FINANCIAL ENVIRONMENT



markets, in order to promote competitiveness, employment and sustainable growth.

# SECTION 2 ACTIVITIES OF THE GROUP IN GREECE

# DIAGRAM 2.1.1 BANK MORTGAGE LOANS (BALANCES AT YEAR END - € BILLIONS)



#### 2.1 RETAIL BANKING

In 2011, NBG focused on the evaluation and optimisation of existing and new credit risk mitigation programmes, with a view to keeping loan book quality at acceptable levels under the current financial and general macroeconomic conditions.

In light of the ongoing deterioration in the macroeconomic environment and the sharp decline in borrowers' incomes, in 2011 the Bank continued to offer a range of flexible debt restructuring products under terms designed to help retail customers experiencing debt distress. The Bank also stepped up its efforts to collect amounts in arrears so as to sustain its liquidity.

In addition, to further enhance the framework for managing distressed retail debt, the Bank enhanced its efforts for the automation of related operations by assessing and upgrading the existing computer infrastructure, and implementing flexible strategies for the effective management of the loan book.

#### Mortgage lending

In 2011, the impact of the economic crisis on the mortgage market intensified, due to the contraction of household incomes, the significant increase in unemployment, and the mounting uncertainty over the duration and the depth of the crisis. Accordingly, the aggregate mortgage loan book across the banking sector saw a further decline, which is expected to continue in 2012. In a similar vein, the quality of the respective portfolio deteriorated, with increased delinquencies and debt in arrears. The Bank's mortgage loan book fell marginally by 4.3% in 2011 to €19.8 billion (DIAGRAM 2.1.1). Its market share remained unchanged, at approximately 24%, well above its peers.

The Bank has oriented its strategies so as to address effectively the escalating crisis and help customers meet their obligations. The programmes designed for this purpose were first launched in mid 2010 and fine tuned in 2011, whereupon they showed their positive impact on the Bank's loan book. Their aim was to help customers continue regular repayment of their mortgages, thereby enhancing the rate of collection, while at the same time flexible repayment packages include the option to pay interest only for a specified period and to extend the loan repayment term, in line with the customer's more recent financial status.

Specifically in the case of unemployed customers, the Bank has implemented special loan restructuring packages under particularly favourable terms.

In 2011, over 23,000 mortgage loans worth €1.5 billion were rescheduled and their progress to date shows encouraging signs of successful default prevention and the maintenance or regaining of normal repayment conditions.

New disbursements declined by 79% to circa €300 million, against €1,415 million in the previous year, due to low demand and stricter customer credit evaluation criteria.

Both in the case of providing relief to distressed borrowers (in the form of debt rescheduling and restructuring) and new disbursements, the Bank has further enhanced the loan collateral required and insurance coverage. Steps are also being taken to strengthen the customer's overall relationship with the Bank by providing incentives to attract deposits.

NBG will continue to offer assistance to distressed borrowers, seeking ways to enhance collection of loans and the quality of its existing and new mortgage portfolios.

#### Consumer lending

In the sphere of consumer lending, the Bank's efforts in 2011 focused on enhancing the quality of the consumer loan book

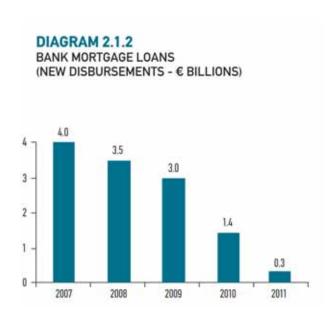
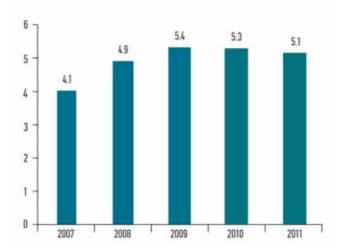


DIAGRAM 2.1.3
BANK CONSUMER LOANS
(BALANCES AT YEAR END - € BILLIONS)



The offering of new debt restructuring solutions to customers facing or likely to face difficulties in repaying their dues has proved to be popular, with some 47,000 loans worth 647 million being rescheduled under improved terms.

The effectiveness of the Bank's efforts to clean up its loan portfolios was reflected in the fact that, by virtue of these efforts, it succeeded in covering part of its claims by real securities. Our policy of securing additional collateral led to the coverage of approximately 30% of rescheduled debts (that were previously unsecured) with prenotations on urban real estate.

The Bank was also active in the management of customers that have filed for bankruptcy protection. NBG's branches received and issued a host of applications for debt certificates under Law 3869/2010 as well as applications for extrajudicial settlement. Green financing initiatives were continued for yet another year, with the offering of new products and solutions for the installation of photovoltaic systems on roofs.

To enhance the management of loan requests and approvals, the Bank deployed its Retail Banking Application System (RBAS), developed in-house, and its Workflow Competence Center (WCC) for the management of customer loan and debt rescheduling requests, with excellent results in terms of cost, security and quality of credit procedures. Institutional and regulatory requirements that were once met through non-automated procedures are now handled automatically by the RBAS.

#### Credit cards

In 2011, the Bank focused on improving liquidity by encouraging customers to use debit cards in their daily transactions and by cleaning up its credit card portfolio.

Specifically, the Bank replaced 2.5 million old EthnoCash debit cards with the new expanded and more secure EthnoCash Plus Maestro which comes with chip & pin technology, and can be used in ATMs and partner retailers in Greece and abroad, directly debiting the cardholder's deposit account.

With its new upgraded EthnoCash Plus card, the Bank has laid the foundations for establishing the debit card as a state-of-the-art payment instrument in daily transactions, convenient for customers and retailers alike.

With respect to its credit card portfolio, the Bank stepped up its measures to assist its customers by providing debt rescheduling products under privileged terms.

In addition, NBG focused on qualitative expansion of its credit card portfolio by supporting reward and cash-back programmes, placing particular emphasis on its "go" cards and "go National" customer loyalty programme that enable cardholders to enjoy cash bonuses and special offers via partner retailers.

Specifically, the Bank offered throughout the year its special "go National" discount programmes that enable customers to enjoy instant gains on the purchase price of a wide range of goods and services from popular stores and franchises.

Furthermore, as part of its social responsibility actions, the Bank launched its "go for kids" programme through which the Bank gives a part of its card turnover to support non-profit organizations such as the Ark of the World, Lyreio Children's Foundation, Margarita, Merimna, To Ergastiri and Flame, which support children and young people among vulnerable social groups.

In 2012, the Bank aims to launch tailor-made products for consumers, further develop its loyalty programmes, and consolidate the use of its debit cards as a payment instrument for shopping.

## Lending to small businesses

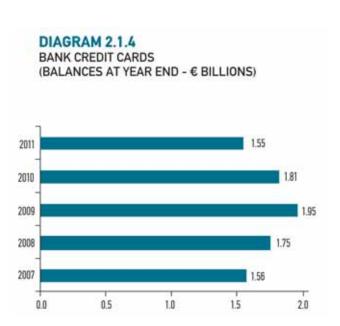
In the sphere of lending to small and medium businesses (SMEs), the Bank continued to support sound businesses that are being buffeted by the economic crisis in Greece, as well as those that are experiencing difficulty in meeting their loan repayment obligations by rescheduling their debts under favourable terms and conditions.

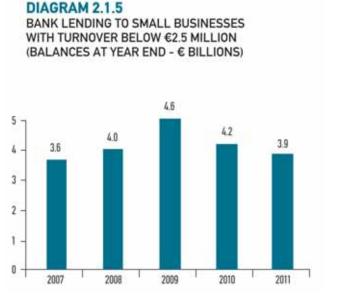
Specifically, €290 million were disbursed and 6,600 customers struggling against the economic headwinds were given the option to renegotiate their debts under improved terms (total balance of renegotiated debt as at 31.12.2011: €771 million).

The lending balance to small businesses, which has been impacted by the limited demand for financing on the part of the businesses due to the economic crisis, stood at  $\in$ 3.9 billion, at the end of 2011, down 8.1%.

In its endeavour to enhance the competitiveness of Greek SMEs, NBG secured its participation in the following co-funded programmes:

- The EU funding initiative JEREMIE, which seeks to provide €60 million in financing to new and newly-established SMEs and a further amount of €60 million to IT and communication technology investment initiatives;
- Growth initiatives with the ETEAN SA Fund for Entrepreneurship, which seeks to support





young entrepreneurs with total financing of €90 million, and to channel €150 million to support investment plans concerning thematic tourism, renewable energies, and the application of technologies that contribute to savings in natural resources and the protection of the environment.

In 2011, in the framework of strengthening the National Strategic Reference Framework 2007-2013, the deployment of investment proposals continued through the call for proposals under NSRF Action A. In 2012 it is anticipated that, on the basis of the current investment timeframes, a further 360 investment proposals will be implemented.

#### 2.2 BUSINESS BANKING

The business loan book in Greece presented limited deleveraging (-0.4%) year on year, while the Bank's total balance of loans to businesses with turnover over €2.5 million stood at €18.9 billion (DIAGRAM 2.2.1).

### Corporate lending

In 2011, despite the escalating crisis in the market, NBG succeeded in maintaining the high quality of its corporate loan book.

As part of our policy to ride the storm of the recession, we arranged to reschedule the loan repayments of businesses that are experiencing liquidity problems.

The Bank continued to play a significant role in financing businesses that are active in the field of RES. Specifically, in 2011 NBG approved financing of projects of a total of 21.25 MW power capacity.

Total lending to corporations amounted to €6.3 billion in 2011, unchanged from 2010. Financing to the wider public sector under Hellenic Republic guarantee declined by 7.5%.

The Bank's lending to corporations overseas contracted significantly due to adjustment in our cross-border transactions policy and the transfer of monitoring of part of the said portfolio to NBG's international subsidiaries and branches.

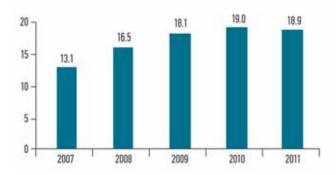
The adverse economic climate prevented the Bank from participating in international financing activities, while coverage of the needs of the Group's subsidiaries headquartered abroad was reduced in line with efforts to diversify their funding sources.

DIAGRAM 2.2.1

BANK LENDING TO BUSINESSES

WITH TURNOVER OVER €2.5 MILLION

(BALANCES AT YEAR END - € BILLIONS)



#### Project finance

In 2011, the Project Finance portfolio posted a significant decline, mainly as a result of the liquidation in the global market of selected financing of projects abroad, in line with the Bank's policy to deleverage in light of the general economic environment. In a similar vein, the discontinuation of financing of four out of five large infrastructure (motorway) projects underway in Greece, due to problems in the construction phase and to the impact of the crisis on their viability, meant that there was no increase in the domestic lending portfolio. The Greek State is making serious efforts to revive the said projects in the hope of reactivating them within 2012. If these efforts bear fruit, and the projects advance over the course of the coming three to four years, the domestic lending portfolio will grow significantly, in view of the fact that the Bank's total commitment amounts to €310 million, of which €71 million had been disbursed by the end of 2011.

Developments in the lending portfolio are set out in the table below:

**TABLE 2.2.1** 

€ million	31 December 2010		31 December 2011		Change 2011/2010
	Number of projects	Outstanding loans (million €)	Number of projects	Outstanding loans (million €)	
Loans to domestic projects	7	89.6	7	89.3	-0.3%
Loans to projects abroad	16	483.7	13	364.7	-24.6%
	23	573.3	20	454.0	-20.8%

#### Lending to medium-sized businesses

Within the harsh economic environment prevailing in Greece, our strategic focus with regard to mediumsized businesses was to provide support to sustainable business plans.

To this end, credit frameworks were offered to customers who could adequately substantiate positive prospects with regard to their ability to sustain a specific minimum level of activity and performance, this being a precondition for their medium to long-term solvency.

Against this backdrop, and in view of the reduction in business lending needs within an environment of falling demand, contracting activity and attempts to reduce operating costs, NBG continued to provide financing to sound business activity.

In light of these circumstances, note also that:

- the Bank offered favourable terms for its customers' medium- and long-term borrowing needs, via funds obtained by NBG from the European Investment Bank earmarked for SMEs;
- Financing for RES projects, particularly photovoltaic parks, posted substantial growth.

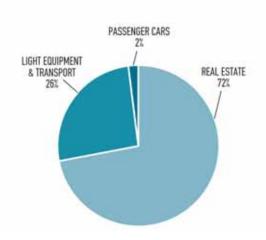
In a similar vein, the Bank was particularly active in offering loan restructuring products to customers facing liquidity problems but who are able to demonstrate long-term viability, by implementing tailor-made business restructuring plans.

#### Leasing

With the deterioration in the business climate, new leasing contracts posted a significant 50% decline, while leases outstanding fell by around 8% (€686 million in 2011, compared with €747 million in 2010). A breakdown of the active leasing portfolio at 31 December 2011 is set out in DIAGRAM 2.2.2.

In view of the ongoing deterioration in the economic environment, Ethniki Leasing focused on effective management of credit risk, maintaining sufficient liquidity, and containing operating costs.

# DIAGRAM 2.2.2 BREAKDOWN OF LEASING PORTFOLIO IN 2011



#### Shipping

In 2011, within a particularly harsh financial environment and a shipping market that has generally lost the strong momentum of previous years, the Bank focused on supporting existing customers with a view to maintaining and managing the high quality of its loan portfolio. Accordingly, NBG continued to finance new, high-performing and energy-efficient vessels; indeed, 57% of its shipping portfolio corresponds to loans for vessels under 5 years old. Likewise, the Bank sought and managed to sustain the deposit base of its shipping customers, and improved the factors shaping net interest income in its loan book.

As at 31 December 2011, shipping financing amounted to USD2.4 billion against USD2.5 billion in the previous year. The larger part of the loan book concerns dry cargo vessels (40%) and tankers (39%).

#### Global transaction services

NBG's leading position in the Greek banking market and its specialisation in offering global transaction services enable it to meet the changing needs of Greek businesses.

Since companies active in the domestic market are facing risk and cost problems, the Bank supports its corporate customers by offering electronic collection and payment services, enabling speed of transactions and instant access to information at low cost.

To help its corporate customers cover their working capital needs, the Bank has expanded its factoring services. The Group, via Ethniki Factors, continues to provide valuable support for the operational and funding needs of importers and exporters.

By leveraging the extensive network of its international correspondent banks, its strong relationships with major international financial organisations and its presence in SE Europe, NBG has managed to ensure the maximum possible servicing of its customer transactions. In addition, the Bank's active participation in negotiations between the parties, coupled with a wide range of flexible solutions for financing trade and receivables, have generated successful results.

Nevertheless, the sharp slowdown in Greek economic activity has taken a heavy toll on the flow of Greece's commercial transactions abroad, while such transactions are carried out under adverse payment terms and at increased cost. However, true to its institutional role, NBG places special emphasis on supporting export businesses, helping them to gain a firmer foothold in overseas markets and enabling them to keep their supply chain flowing smoothly.

#### Managing loans in arrears

In 2011, the Bank made intensive efforts to achieve the best possible yields for the Bank's portfolio of business loans in arrears.

Accordingly, the Bank leveraged:

- the improved organisational and operational structures arising from the approved restructuring framework for the liquidation of dues in arrears;
- available resources (know-how and experience, procedures and methodology, staff) through targeted actions aiming at achieving out-ofcourt settlements/workouts.

These actions were taken against the backdrop of:

- ongoing deterioration of the economic crisis and of the overall economic and social climate, which had a severe impact on those debtors already in default, while also generating new failures and loan repayment problems due to the lack of liquidity and real inability to repay, ultimately resulting in the rapid increase of cases of debt falling into arrears;
- the constantly changing regulatory framework and the adoption of extraordinary legislative measures for the suspension of enforcement, which restrained the liquidation of claims through court actions;
- the special nature of cases of default, which the Bank confronted in line with its longstanding social awareness.

#### 2.3 ASSET MANAGEMENT

#### Deposits - investment products

The Bank's key actions in the field of deposits in 2011 were in line with its strategic objectives to:

- defend the deposit base and maintain liquidity at the highest possible level, at a time when total deposits in the Greek economy declined dramatically, and
- achieve greater penetration among customer groups presenting special characteristics.

In line with the general market trend in 2011, NBG's total balance of deposits posted further decline. Despite this fact, NBG's market share grew in all of the following categories: savings deposits to 34.1% (+70 bp), time deposits to 15.6% (+30 bp), sight deposits to 22% (+150 bp), indicating the trust of Greek depositors in the Bank.

With regard to its mix of deposits, NBG managed to sustain the balance between low- and high-interest deposits (ratio of savings to time deposits: 1 to 1), thus maintaining the Bank's comparative advantage in terms of cost against other banks (market ratio: 0.5 to 1).

#### Regarding the said deposit products:

- A new "NBG Sight Account" account was launched for SMEs and self-employed individuals, reflecting the Bank's new approach to its provision of services to corporate customers, with the offering of a variety of privileges and free transactions.
- 2) The Bank continued its efforts to approach customer groups of varying profiles with its "Salary Plus", "Business Plus", "Farmers Plus", "Student Life" and "Family Fast" account deposit products. Specifically, the Bank:
- Made systematic efforts to attract salaried public and private sector employees to open salary accounts with NBG:
- Placed special emphasis on approaching pensioners within the context of their registration in the national pension list which, for most pensioners, was completed in 2011, so that payment of their pension is made through an NBG account:
- Continued to service farmer subsidies and rural development measures by crediting accounts of beneficiaries who have chosen NBG for the payment of such subsidies, as well as to further penetrate the said customer group;
- Continued its special offer to OGA pensioners ("Farmers Plus – Pension").

#### With regard to liquidity:

- The Bank boosted its market share of sight deposits, which comprise a low-cost source of liquidity. The contribution of our new "NBG Sight Account" product to this end was significant as, due to its privileged terms, the beneficiaries were encouraged to increase the deposits held in their accounts and conduct a wide range of transactions through the said accounts (payments, salary payment etc).
- NBG's range of products (time deposits, "Monthly" 6-month and 12-month time deposit, "Capital Plus" guaranteed initial capital investment products) was enhanced with the following new guaranteed initial capital products "Capital Plus Fixed Rate Callable" and "Capital Plus NBG 170" offered on the occasion of the 170th anniversary of the establishment of the Bank.

#### DIAGRAM 2.3.1 GREEK MUTUAL FUND MARKET: ASSETS 2007-2011 (€ BILLIONS)



As regards the Bank's systems, one of its key concerns is to develop its new CRM system. The new system aims to enhance customer services and seeks to record trends in its clientele and liquidity products, track transactional behaviour, and provide primary data, in order to enhance the vital task of liquidity management.

In addition, to monitor customer investment behaviour a new user-friendly system has been designed to provide key information to branch officers involved in customer services and to produce reports related to customer portfolio activity.

In 2011, within a constantly shifting and uncertain financial environment on both the national and international levels, the Bank focused on customer satisfaction. Via Personal Banking services, NBG further enhanced the level of its services offering a full range of banking products and services.

Personal Banking posted particularly strong performance, in line with the Bank's strategy:

- 395 Personal Banking officers, who have received professional accreditation through special selection procedures and ongoing training, handled funds worth €12 billion, thereby playing a decisive role in sustaining the Bank's liquidity;
- 23 branches were added to the Personal Banking network in 2011 so that a total of 100,000 customers at 332 branches were able to enjoy this privileged service;
- the contribution of Personal Banking officers to the successful deployment of the new CRM system by the branch network was also vital, and decisive in sustaining and enhancing the Bank's liquidity.

The provision of privileged services and the consolidation of all-round, long-term banking relationships based on trust contributed to the growth of NBG's market share in 2011.

#### Mutual funds

The Greek mutual fund market moved downward in 2011. The adverse economic environment in Greece throughout the year impacted collective investments, resulting in outflows in all MF categories. At the same time, the assets that remained declined in value, due to the decline in equity and bond values. Total MF assets in the domestic market contracted by €2.79 billion (-34.8%), to €5.23 billion at the end of the year (DIAGRAM 2.3.1).

Total assets under management at NBG Asset Management arising from mutual funds and portfolio management amounted to €1,097 million at the end of the year. The market share of MFs stood at 17.4% (DIAGRAM 2.3.2).

Note that the various individual market shares in most MF categories improved, mainly because of lower outflows compared with our peers (TABLE 2.3.2).

**TABLE 2.3.2** 

MARKET SHARES OF NBG ASSET MANAGEMENT MF SA				
Mutual fund category	31.12.2011	31.12.2010		
Bonds	31.5%	28.8%		
Equities	19.3%	18.2%		
Mixed	14.1%	12.6%		
Fund of Funds	20.2%	16.0%		
Total	17.4%	17.3%		

Source: Hellenic Fund and Asset Management Association

To deal with the impact of the economic crisis the Bank applied specific measures as of the beginning of 2011:

- containment of operating costs, while maintaining the quality of services provided undiminished;
- development to the maximum of synergies with the Bank and other Group units;
- preparation of a study on the restructuring of the existing product range.

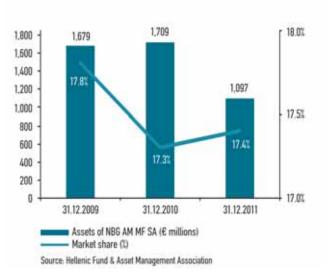
Similar actions are planned for 2012, so as to achieve a new, more flexible structure and range of products that match investors' current needs and requirements.

NBG Asset Management Mutual Funds SA manages 25 DELOS Mutual Funds and 7 Funds run under the umbrella of the Group's Luxembourg-based NBG International Funds SICAV. The said funds cover the major investment categories (equity, bonds, capital protection etc) and geographical zones (Greece, Europe, USA, emerging markets) thereby meeting a broad range of its clientele's investment needs.

The clientele consists of over 52,000 shareholders, 70 of whom are institutional investors (pension funds and organisations).

The returns on MFs in 2011 were impacted by the negative climate in the global capital markets and the domestic market in particular for bonds and equities. Nevertheless, several of the funds outperformed their benchmarks.

DIAGRAM 2.3.2 TOTAL ASSETS & MARKET SHARE: NBG ASSET MANAGEMENT MF SA



In 2012, NBG Asset Management MF SA aspires to further enhance its leading position in the MF market as well as in the management of institutional and private portfolios (asset management), in the Greek and other regional markets where the Group is active.

#### Private Banking

Within an extremely harsh environment, NBG Private Banking managed to retain the confidence of customers, providing consulting services relating to economic developments and offering the most advantageous investment options.

Confronted by these difficult conditions, customers largely avoided undertaking investment risks, while they benefited from the substantial opportunities presented by liquidity products and high-interest deposit products. Their investment choices tended to focus on overseas securities enjoying top-rank credit ratings.

Within the adverse environment funds under management fell by €1,911 million. However, the number of customers receiving NBG's elite Private Banking investment services remained broadly unchanged on the previous year. Indeed, it is notable that NBG's Private Banking arm managed to attract new customers.

NBG's performance in 2011 demonstrates that the foundations of its Private Banking operations in Greece are sound and reliable. Its business model offered it the flexibility to perform successfully within the particularly difficult conditions prevailing in the markets.

#### 2.4 INVESTMENT BANKING

#### Capital market operations

In 2011, our Investment Banking Unit was restructured within the context of the Bank's endeavour to play a leading role in both the Greek State's extensive privatisation scheme and the anticipated corporate reconfigurations that will emerge from the fiscal and credit discipline imposed by the markets.

To this end, NBG reinforced its human resources by recruiting officers from the market and carried out investments in infrastructures in order to pursue significant projects.

During the previous year the following projects were undertaken jointly with international investment houses and on behalf of the Greek State:

- 1. Athens International Airport Eleftherios Venizelos (expansion of the concession and sale of the government's holding).
- OPAP (expansion of the concession, new concession of VLTs, sale of the government's holding).
- 3. Public Power Corporation SA (sale of the government's holding, sale of company assets).
- 4. HELIOS Project (investment in photovoltaic parks under inter-state agreement).
- 5. Scheme to leverage public real property (coordinator financial advisor).

Prosecution of these projects should be carried out in 2012-2013, although the last on the list will be longer in duration.

In addition, a number of projects in the sphere of capital markets were completed:

- consulting and underwriting services in the share capital increases of ATEbank;
- consulting services for the "EUR 250mln Euro Medium Term Note Programme" (EMTN) of FBBank and the subsequent bond issue with a Hellenic Republic guarantee of €50 million.
- Advisor to Korres for its SPO, advisor to the Board of Rilken in the public offering by Henkel Hellas, and advisor to Lomond in the public offering for Crown Hellas.

Furthermore, it is worth noting that our cooperation with the respective Finansbank Unit (Finansinvest) has been significantly upgraded through the joint undertaking of projects as well as the exchange of ideas, practices and team members.

#### Treasury

In 2011, access by Greek banks to international markets was extremely limited.

The market in Greek government bonds continued to post massive decline in trading volumes and prices. For instance, the price of the 10-year benchmark bond dropped from 65.76 at the beginning of 2011 to 22.00 at the end of the year.

In light of the decisions to set up support mechanisms in the euro area (the EFSF and ESM), the Bank applied for, and secured, participation as a primary dealer in the issues by the said bodies, while it was also very active in the primary and secondary markets that have begun to evolve.

In the forex market, the reluctance of foreign banks to collaborate with Greek banks caused performance to suffer and trading volumes to fall.

With the launch of a new transaction settlement system the Bank succeeded in enhancing the services provided in Q4.2011.

#### **Brokerage**

The ongoing economic crisis took a heavy toll on the Greek stock market in 2011, as both average daily trading volumes and the ATHEX general price index tumbled, particularly during the second half of the year. The average daily trading volume for 2011 was €82.4 million, down by 41.0% compared with 2010, while on a half-yearly basis it was €107.0 million in H1 and €58.8 million in H2. The composite price index dropped by 51.9% year on year. It is notable also that the activity of foreign institutional investors was significantly lower, at 42.4% of the ATHEX, compared with 47.9% a year earlier, while the activity of new remote members of the ATHEX stabilised at 19.2%. These developments had a general negative impact on the turnover of brokerage business.

Nevertheless, the Group's brokerage arm, National Securities SA, ranked among the top three performers of the market, with total trading of €5.2 billion and a 12.5% market share, marginally better than in 2010. Given the close correlation of the company's revenues with the prices of shares listed on the ATHEX, as well

as the likelihood that the economic crisis will persist, the company initiated in 2010 and continued more intensively in 2011 a significant programme to streamline its operating costs. In addition, the company restructured its private investors department with a view to adjusting to the current market conditions and improving working methods, in light of the anticipated changes in the local and global stock market environment.

In 2011, NBG continued to act as a market maker in all listed derivative products and a large number of equities, offering the market vital liquidity and, despite the stressed conditions, also included two new FTSE20 companies as well as two derivatives (Futures in the FTSE Banking Index and ETF in the Greece & Turkey 30 Index) for which it acts as the sole market maker.

The sharp fall in investment activity was also apparent in the derivatives market with the FTSE20 index recording losses of over 25% year on year in the average total of open positions. Despite the adverse conditions, the company ranked second with total market share in the FTSE20 of 25.5%.

Last, NBG actively participated on behalf of its customers in emissions auctions carried out by the ATHEX for the first time in 2011, where the Bank gained first place in terms of market share.

In 2011, the analysis department enhanced the quality and the range of products offered, improving its competitiveness. Periodic issues of surveys relating to the banking sector (weekly) and refineries (monthly) were published. In addition, analyst presentations to Greek and foreign investors as well as investor meetings with company managements in Greece and abroad were stepped up.

Our main goals in 2012 are to continue the drive to streamline operating costs and further leverage the Group's customer base by developing new investment portfolios and further enhance the services provided.

#### Private equity

NBGI Private Equity continued to manage ten funds, whose investment strategy ranges from Western Europe – including the mergers of small and medium companies in the UK and France – to SE Europe, including Turkey. In addition, it manages three funds that focus on specific sectors (namely medical equipment, energy and real estate).

The company forged a strong position, carrying out successful investments in small and medium European

companies. 2011 continued to be difficult for the European private equity market. Nevertheless, the company continued its investment programme across the spectrum of its activities. As the economic crisis continues to adversely affect businesses, the company put off its plans to launch an investment portfolio in Germany in 2011, although broadening its West European coverage remains one of its long-term objectives. The crisis has undoubtedly impacted some of the firms in its investment portfolios, and accordingly NBGI Private Equity's investment teams continued to work together with the management of these firms in order to ensure that the investments are maintained and improved.

NBGI Private Equity is working alongside the NBG Group to find ways to include other investment partners in the funds under management. This will enable further diversification of the funds' investor base and as a result reduce the company's future exposure to invested funds. Accordingly, the company took the initiative to launch a fund that will enable voluntary participation of investors in the base of each transaction. Furthermore, NBGI Private Equity aims at launching a fund that focuses on supporting Greek firms that need restructuring.

In 2012, the company intends to continue its diversification strategy and maintain its investment rate across all portfolios.

#### Consulting services

Consulting services to the Greek government and private bodies in the sphere of concession projects and Public and Private Sector Partnerships (PPPs) experienced stagnation in 2011. Review of the government strategy in these areas, given the adverse outlook for advancing such projects in the current climate, led to the postponement of implementation of some of the projects. NBG, as head of a consortium of advisors, offers consulting services to the Hellenic Public Property Company in its efforts to leverage the potential of its real estate.

In addition, NBG is actively involved in two PPPs, at the head of an international consulting consortium (School Building Organization: 22 new schools in Attica; Democritus University of Thrace: student halls of residence). Temporary concessionaires for the first project have already been selected, while the tender for the second project is in progress.

In January 2012, the Bank was selected along with Guggenheim Capital LLC as financial consultant to the Greek government for the HELIOS project, which will

involve export-oriented large-scale utilisation of solar energy in Greece.

In December 2011, NBG, as an "Urban Development Fund (UDF)", undertook the management of resources from European Structural Funds in the context of the JESSICA project (Joint European Support for Sustainable Investment in City Areas), totalling €83.3 million, corresponding to 1/3 of total JESSICA resources for Greece. The project channels funds to the regions of Attica, Ionian Islands, Western Greece, as well as to the operational programme "Environment and Sustainable Development". During 2012-2015, these funds along with funds from the Bank and other private sources shall be used to finance eligible urban development projects.

#### Custodian services

With its long-standing and dynamic presence, NBG plays a leading role in the constantly evolving, complex and specialized post trading environment, participating in related international and domestic bodies such as the Hellenic Bank Association, Hellenic Exchanges SA, ECB/T2S, COGESI Group and CCBM2, and the EBF/Post Trading Working Group.

The economic crisis not only means that custodian services registered minimum activity, but also deprived local custodian service providers of significant competitive advantages because of their low credit ratings. NBG, despite the extremely adverse environment, managed to mitigate the impact of the crisis by maintaining excellent business relationships with its clientele and providing top-class tailor-made services adjusted to the new financial conditions.

NBG's record of success over the last years and highquality services have once again been recognised by its Greek and international institutional customers, who awarded NBG's custodian services the title "Top Rated" in the annual survey conducted by industry journal Global Custodian, while it gained the top score among Greek and international competitors in the "leading clients" category, in which it participated for the first time.

### DIAGRAM 2.5.1 DOMESTIC BRANCH NETWORK



#### 2.5 STRATEGY FOR OPERATIONS UPGRADE

#### Branch network

In 2011, the branch network continued to be the main pillar by which the Bank supports and implements its strategic objectives. In the midst of the ongoing recession, NBG's network focused on the following key objectives:

- To improve its operational efficiency by extensively restructuring the branch network, cutting back operating expenses, and maintaining high-quality customer services.
- To sustain liquidity, by restraining the outflow of deposits, as reflected in the increase of its market share in all deposit types.
- To support customers facing difficulties in repaying their loans, through customer-focused services and the launch of new products aimed at facilitating smooth debt repayment.
- To finance sound businesses and individuals, through existing funding programmes, including European funding projects.

The unfavourable economic climate affected banking operations in aggregate and led to new strategic priorities aimed at swift and effective adaptation to current developments. As a result, within 2011, 35 branches were merged, 8 transaction offices and 2 branch annexes closed and 5 branches relocated. In addition 3 new i-bank units were launched.

At 31 December 2011, NBG's domestic network totalled 539 branches, of which 232 were full banking units and 307 retail banking units, 44 transaction offices and 7 branch annexes. Despite the realignment, NBG's network remained by far the largest network in Greece, maintaining its market share at 14.2% of total bank branches.

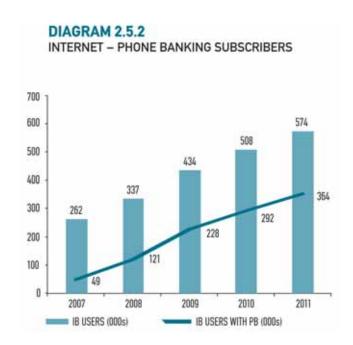
The Bank's coordinated efforts to improve customer services resulted in reducing by 10% the average waiting time in around 200 branches where an electronic queue management system has been installed. Likewise, teller productivity increased, while total branch counters in use remained unchanged.

With respect to human resources, the number of branch staff over recent years is decreasing. At 31 December 2011, the network personnel (excluding Loan Workout units and the Shipping Branch) amounted to 7,117, compared with 7,421 at 31 December 2010, down by 4.1%.

Efforts to reduce congestion in the back-office were continued by means of various improvements, changes and automation in the following systems:

- cheque management,
- money transfers by individuals,
- central management of international operations and letters of guarantee,
- electronic submission of corporate financing requests (WCC),
- safe deposit box/vault management application (ESAMS).
- customer-focused CRM.
- SAP electronic system, to change the way operating expenses are monitored,
- customer service system.

Finally, increased security measures were taken for the protection of the Bank's customers, personnel and assets.



#### Alternative delivery channels

The Group's web portal reflects its innovative profile. Harnessing state-of-the-art technology, it provides real-time information on the Bank and the Group as well as the products and services offered to individuals and businesses.

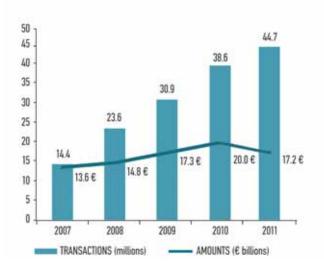
For yet another year, in 2011 the number of visitors to the web portal posted a steady increase.

Furthermore, the use of internet, phone and mobile banking networks continued to increase. New transaction categories and improvements were incorporated into the Internet Banking functions, while its registered users are now more than half a million.

Over 44 million transactions worth 17.2 billion were carried out via internet, phone and mobile banking. (DIAGRAMS 2.5.2 & 2.5.3).

Despite the highly sceptical climate caused by the troubled economic environment, e-banking services continue to attract a steadily growing number of customers who enjoy the transparency and security of this transactional mode. Accordingly, although the overall value of transactions decreased, their volume grew, while the 2011 target for new registrations was met. In addition, despite the adverse climate, the

DIAGRAM 2.5.3
INTERNET BANKING TRANSACTIONS



#### DIAGRAM 2.5.4 ATM TRANSACTIONS (€ billions)



number of visitors to our web portal has increased significantly.

Our Contact Center continued to support the Bank's operations and further enhanced our i-bank services. Pursuing dynamic and innovative development, the Contact Center further expanded its activities to support 3 new i-bank stores in Athens (The Mall Athens) and in Thessaloniki (Aristotelous Square and Mediterranean Cosmos Mall). The Contact Center's advanced services combined with the i-bank stores' state-of-the-art electronic banking environment have created a unique e-banking platform by domestic and international standards that is particularly popular among younger customers. During their first year of operation the i-bank stores were visited by more than 400,000.

In March, NBG launched the Procedure and Application Help Desk which provides dedicated support to the Bank's branches and central units.

Furthermore, the phone services provided to Ethniki Insurance were expanded, with the Contact Center undertaking a key role in the Transaction Upgrade Project. The aggregate increase in the daily volume of services totalled 40% in 2011.

The developments outlined above were achieved alongside a 40% reduction in the Center's operating expenses and optimisation of call flows, as dictated by current market conditions.

At 31 December 2011 the Bank's ATM network comprised 1,400 ATMs (866 in-site and 534 off-site), 100 fewer than the previous year, as a result of efforts to reduce the network's operating expenses. Average monthly transactions per ATM totalled 5,779, up by 6% against 2010.

In 2011, ATM transactions increased marginally by 3% (DIAGRAM 2.5.4), despite the reduced number of ATMs.

The Bank runs a fleet of 33 Automated Payment System points (APS), in essence forming a new customer service network via which more than 500,000 transaction were effected in 2011.

#### Technological upgrade

In 2011, as part of the Bank's business strategy and in order to meet extraordinary business and regulatory requirements, technological upgrades at the Bank continued unabated, with a focus on:

 keeping the computer infrastructure sufficiently powerful to support new systems of the Bank and the Group's companies;

- further developing alternative delivery channels offering high quality services;
- improving the mode of delivery of retail banking services;
- further decongesting back-office operations;
- reducing operating expenses;
- achieving economies of scale through the homogenisation of key processes at Group level (i.e. purchasing and construction works).

These objectives were pursued in line with the relevant supervisory and regulatory frameworks as well as the international economic climate.

Throughout 2011, a host of organisational, operational and computing projects were carried out in support of the Bank's functions.

By the end of the year, around 100 technology related projects relating to various operational areas, were completed, the most important of which are listed below:

- Expansion of the automated workflow system for the Management of SME Loan Requests to all full-banking and selected retail banking units.
- Launch of a new Retail Banking Applications Management system, for electronically forwarding and processing consumer credit loan requests that are filed by the branches, the corresponding Retail Collections unit and the Consumer Credit Fast Line service, and processed by the Loan Approvals Centre.
- Completion of the conversion of approximately 8,000 credit cards to chip technology, with the conversion of Business Mastercard and Platinum Mastercard.
- Mass replacement is underway of approximately 2.5 million magnetic strip ETHNOCASH cards by the new ETHNOCASH PLUS card incorporating chip technology. The new card is accepted internationally and can be used for both purchases and cash withdrawals in Greece and abroad.
- Deployment of infrastructures required for the Bank's participation to the "Energy-saving at home" programme of the National Fund for Entrepreneurship and Development.

In 2011 the Bank continued to develop systems and upgrade procedures aimed at enhancing its transaction services, leveraging alternative delivery channels, and

further improving the performance of back-office operations.

With respect to the Group's transaction services, the installation of a new payment system for the management of outgoing money transfers was completed, while preparations are underway for inclusion in the system of the management of direct debit, mass payments, payments in favour of third parties, collection in favour of third parties, customer orders and SEPA payments.

With respect to our efforts to enhance branch network performance and relieve it of certain back-office operations:

- Centralization of import export payments was expanded to all branches;
- The development of a new application for recording and managing domestic staff overtime in the SAP HR system was completed, improving the procedures and significantly reducing related costs;
- Digitisation of decisions of all the loan authorising bodies of NBG's Credit Divisions was completed.

With respect to alternative delivery channels:

- New services were included in mobile banking, such as payment of DEH, OTE and mobile phone bills, while the provision of share trading services and information on ATHEX and CSE trading prices are due for inclusion in the near future.
- An update service for customers was launched via SMS and e-mail regarding their credit cards (e.g., change in credit limits, charges etc.) and deposit account activity.

In 2011, the Bank continued installation and upgrade of systems aimed at enhancing efficiency of risk management and applying supervisory regulations in strategic decision-making.

During 2011, various important projects were carried out, while the development of projects that will significantly enhance the Bank's operations and provision of services continued. These projects include:

The use of e-Statement by customers was further expanded, with a view to reducing operating expenses and saving paper. During 2011, the Bank discontinued sending statements of account and modified the frequency with which loan statements are sent, insofar as this is allowed by regulatory provisions. The information base of the ARIS system was updated in respect of the Bank's organisation charts, collective bodies, forms and processes; a user manual was prepared; and tests were conducted on the publication of the business architecture and authorised processes on the Bank's web portal, so that these can be readily accessed by the entire personnel.

#### 2.6 NBG CUSTOMER OMBUDSMAN

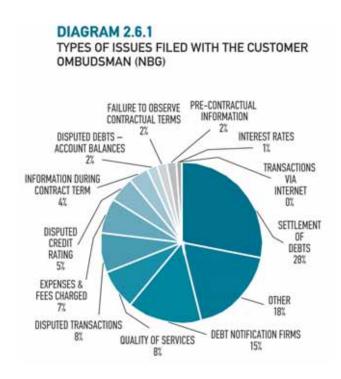
In 2011, the NBG Customer Ombudsman received and processed 1,083 complaints by customers requesting intermediation in various services of the Bank and 125 requests for intermediation vis-a-vis Ethniki Hellenic General Insurance, which was included in the Ombudsman request processing and customer support services as of May 2011.

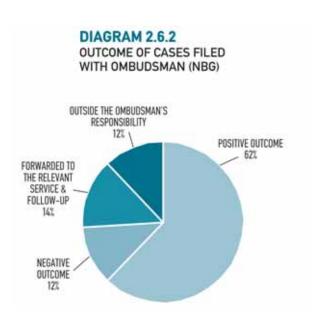
With regard to NBG, the majority of the complaints concerned the settlement of debts and debt notification companies (DIAGRAM 2.6.1). 62% of all complaints were successfully resolved (DIAGRAM 2.6.2), while 65% were settled within one week.

In the case of Ethniki Insurance, the majority of the complaints concerned refusal to compensate or dispute as to the compensation amount (DIAGRAM 2.6.3). Of the total complaints 67% reached a successful resolution, while 50% were processed within one week.

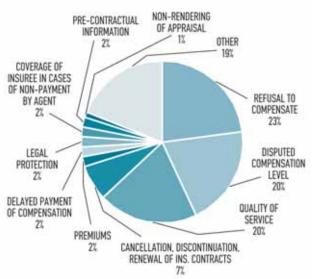
To reinforce the role of the Ombudsman, the following actions were taken:

- The NBG Ombudsman webpage was launched on the Bank's web portal (www.nbg.gr), which includes guidelines for filing complaints, instructions and advice, and FAQs. The webpage also includes articles and interviews on the NBG Ombudsman, which are updated on a regular basis. Within the first few days of launching the website 3,000 visits were recorded, while customers increasingly prefer to file their complaints electronically.
- A brochure on the NBG Ombudsman was published including general information, contact details and a complaint form, which is available in both Greek and English throughout the Branch network in Greece, as well as on the internet.
- Detailed presentations were held with regard to the Ombudsman initiative at NBG's National









Annual Meeting of Network and Management Officers held in February 2011, as well as at the "Bank Management Conference" and "From Customer Loyalty to Advocacy" event, organised in Athens in December 2011.

- 14 articles were published in the daily, Sunday and electronic Press.
- The pre-contractual information documents were redesigned to include the initiative and contact details of the NBG Ombudsman, in collaboration with the Investment Products and Deposits unit.

To extend the functional potential of the initiative, a Code of Ethics for the NBG Ombudsman, now posted on the internet, was prepared with the assistance of Group Compliance. In addition, we continued to offer staff training on banking activities related to issues under investigation.

Finally, in extending the reach of the NBG Ombudsman to Ethniki Insurance:

- A CRM system, like that in NBG, has been recommended for installation in Ethniki Insurance.
- A brochure on the Ethniki Insurance Customer Ombudsman was prepared and published, and can be obtained at the Ethniki Insurance headquarters and at selected offices of Ethniki Insurance, as well as via the internet; the Ombudsman has also been included in the company's communication policy.
- Following contacts with the Hellenic Institute of Business Ethics, Ethniki Insurance was awarded the "Business Ethics Excellence Award".

#### 2.7 HUMAN RESOURCES

Our human resources are NBG's most valuable asset, as they are a key component in the leadership position we enjoy in the sector. In view of the intensely competitive climate currently prevailing in the market, human resources are of vital importance for the Bank in its bid to develop and enhance its business image. Accordingly, in 2011 NBG continued to invest on a systematic basis in the selection, training, evaluation and promotion of its employees.

At 31 December 2011, total Group and Bank staff amounted to 34,698 and 12,189 respectively, compared with 36,866 and 12,775 at 31 December 2010. The Bank staff in Greece decreased by 4.6%. The percentages of men and women in the workforce were 54% and 46% respectively. With regard to their educational background, 38% are secondary school graduates, 37% university graduates, and 14% holders of postgraduate or doctorate degrees.

In 2011, a partial reorganisation of the Bank's HR services was carried out, with a view to establishing integrated supervision of the staff at all the Group's units in Greece, as well as achieving economies of scale. In this context, new electronic applications were designed and monitoring processes of the Bank's partnerships with social security institutions were upgraded.

In addition, the new "Job Descriptions" application was launched. Its completion should contribute to the faster and more effective management of all Bank operations relating to HR management.

To rationalise payroll costs, the Bank took a series of measures such as meeting needs by transferring staff within the Group, reducing overtime, etc.

In the sphere of training, we launched the "Training and Education of NBG Employees" project which aims at generating organisational and quality enhancement through the running of training courses and internal accreditation programmes, evaluation of trainees, distant online training courses, management development schemes etc.

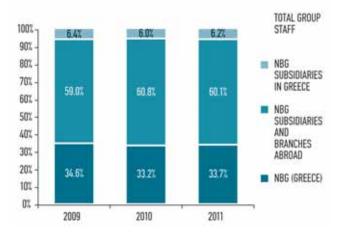
In particular, given the current economic environment it was decided to make further savings in training resources by leveraging state-of-the-art solutions. Accordingly, new e-learning programmes were launched, by which learner participation more than doubled (4,100 compared with 1,590 in 2010). In addition, a system for providing e-learning via the internet was approved to address specific needs of the Bank and the Group.

Training actions for 2011 included a total of 549 events, with 10,567 participants (6,150 in in-house training courses, 210 in seminars outside the Bank, and 4,207 in e-learning and internet seminars etc.). In 2011, training man-hours totalled 173,901, representing an investment of €3.8 million. It is notable that under the same budget as 2010 (though this time including also travel expenses of trainees), 33% more training man-hours were recorded.

The key priorities of the in-house training programmes in 2011 were:

■ To address current issues such as: rescheduling

DIAGRAM 2.7.1 BREAKDOWN OF NBG GROUP STAFF



- of housing and consumer debts, IT system security, anti-fraud actions and handling of criminal acts;
- To continue the professional accreditation courses for 426 employees working in the sphere of provision of investment and bancassurance services, in line with the MiFID;
- To train 233 new employees of the Branch network using a mixed training method (classroom and e-learning), and to carry out a two-year targeted induction, promotion and talent management programme;
- To implement special courses tailored to the needs of subsidiaries in Greece and abroad.

Moreover, the Bank provides support to employees who wish to obtain professional accreditation and attend foreign language courses, in line with the approved policies.

To align and homogenise HR Policies and Procedures across the Group as a whole, an adaptation framework was designed to accommodate the special features of each supervised company. In particular, the following documents were introduced:

- Job description template:
- International Group Training Policy;
- Interview Procedure and Questionnaire for Outgoing Staff;
- HR Manual;
- Performance Assessment and Development Procedure.

With a view to adapting the Group HR Operating Model for use by the Bank's overseas subsidiaries a recommendation for their organisational structure was sent to Romaneasca, Vojvodjanska and Stopanska banks.

To reduce costs at Group and local level and to ensure similar data and management reporting, the Bank collaborated with Ethnodata to install SAP HR and SAP Human Capital Management applications at Banca Romaneasca and the NBG branches in Egypt.

Last, the Bank offered financial support to three eligible employees of NBG subsidiaries in Bulgaria, Romania and FYROM who want to study for a two-year postgraduate Executive MBA programme organised by the International Hellenic University.

#### 2.8 CORPORATE SOCIAL RESPONSIBILITY

NBG fully recognises the value of Corporate Social Responsibility ("CSR") as a prerequisite for the Group's sustainable growth, and has been applying increasingly systematic techniques in its approach to the concept of CSR, an issue that has long been high on the Bank's agenda.

Standing by its commitments, NBG continued in 2011 its wide ranging community actions, attaining targets that were formulated to achieve economic prosperity, support actions designed to foster green growth, enhance the quality of its workforce and the services offered to its customers, and contribute generally to the community at large.

Below are listed the Bank's key CSR actions:

- With initiatives to facilitate financing of enterprises, professionals and households, as well as measures to provide support to vulnerable social groups, the Bank has contributed to limiting the adverse impact of the financial crisis. Specifically:
- In the area of SME financing, the Bank continued to provide its support to healthy firms that are nevertheless labouring under the impact of the domestic financial crisis offering them essential liquidity. In the case of SMEs that are struggling to service their financial obligations, the Bank seeks to reschedule their debts under favourable terms and conditions.
- In its endeavour to enhance the competitiveness of Greek SMEs, NBG secured its participation in the first round of the EU funding initiative JEREMIE, which was launched jointly with the European Investment Fund and concerns cofunded loans to small and micro enterprises that employ up to 50 individuals.
- With a view to creating value for the Bank, and for its employees through the enhancement of knowledge, competence and behaviour, 549 training sessions were carried out where attendance levels reached 10,567.
- In the context of the implementation of its Environmental Policy and Environmental Management Programme, the Bank carried out the following actions:
- The rollout of NBG's internal secure Electronic Mail System has been completed in nearly all central services of the Bank and it has been enriched with various new functions.

- The Project to Revise NBG's Policy Regarding Printing and Dispatch of Bank Statements and Correspondence to Customers was continued. The project aims at reducing operating costs, rationalising printing and saving natural resources (paper).
- Recycling programmes were implemented with the participation of employees. For example, 404 tonnes of paper, 6,036 kg of small and large batteries, 95 tonnes of electronic and electrical equipment, as well as 739 kg of low voltage lamps and lighting equipment were recycled through the expansion of recycling across the Bank's branch network. Moreover, 23 tonnes of used UPS equipment were withdrawn. All these recycling programmes were implemented in cooperation with licensed contractors.
- 5 new distance-learning programmes for employees were introduced (distance learning, ebook, e-learning) bringing the total number of such programmes on offer to 12. Employee participation in these programmes increased by 58%.
- As part of its Environmental Management System, the Bank appointed environmental management officers and their deputies in all of the Bank's Units (administrative units and branch network). Through the intranet communication channel and the staff newsletter "Leading Ahead" the Bank briefed and enhanced awareness among employees of issues relating to environmental management.
- To reduce travel and commuting by the Bank's staff and customers, the Bank continues to expand and upgrade its alternative networks that have been integrated under an umbrella of electronic services (i-bank) that provide roundthe-clock services via five state-of-the-art banking services networks: the ATM network, Internet Banking, the APS network, Phone Banking and Mobile Banking.
- Despite the extremely adverse economic climate, NBG stood by its commitment to social support continuing its tradition of contributing to the community. Accordingly, in 2011 it implemented a sponsorship programme amounting to approximately €14.3 million. The Bank supported a wide range of corporate, social and cultural responsibility initiatives, both directly as a bank and via its funding of the activities of the NBG Cultural Foundation (MIET) and its Historical Archives. The core lines of action focus on the Community, Environment and Cultural Heritage.

#### Community

#### Society

- Grant towards covering the full cost of procuring the Drug Prescription System (software and hardware). The installation and full deployment of the System in all the social security funds supports the goal of fiscal reform, transparency and reduction of wasteful spending, thus significantly contributing to the sustainability of the social security agencies.
- Construction of a new surgical wing at Evangelismos Hospital under a sponsorship programme running over several years.
- Programmes fostering social solidarity.
- Supporting the work of bodies and organisations with distinguished track records in the alleviation of social problems.
- Supporting social groups and individuals.

#### Science - Research - Training

- Participation through sponsorship in the development of digital training programmes.
- Sponsorship for awards, scholarships and research programmes.
- Support for scientific work, predominately in the form of sponsoring conferences that cover the whole spectrum of disciplines.
- Sponsorship for the publication of brochures, books and special editions.

#### Sports

- Sponsorship for the National Gymnastics Association, as well as sponsorship for individual athletes as they prepare to participate in world championships and the forthcoming Olympic Games.
- Participation through sponsorship in the World Sporting Event "Special Olympics Athens 2011".

#### Cultural Heritage

#### Culture - History - Art

- Supporting actions and events that involve music, visual and performing arts.
- Sponsoring the preservation and showcasing of the historical and cultural heritage, the preservation and restoration of monuments and the sponsoring of archaeological excavations.

- Sponsorship support for initiatives involving publications of cultural and historical interest.

#### Miscellaneous

 Support for publications, conferences and other events dealing with investment and financial issues.

#### **Environment**

Key actions of the Bank's environmental action programme include:

- supporting the work of bodies that are involved in environmental and sustainable development actions;
- supporting environmental training programmes;
- participating in the rehabilitation of ecosystems in regions of Greece devastated by fire;
- contributing to actions designed to support and enhance biodiversity.

The Bank, within the scope of its Environmental Policy, launched in 2011 the following green banking products, which make a real contribution to sustainable growth:

- Loan that enables participation in the "Energy-Saving at Home" programme, in collaboration with the National Fund for Entrepreneurship and Development ETEAN SA (former TEMPME), with the total number of loan approvals amounting to 7,311 in 2011;
- "Green Loan": a loan granted under favourable terms for financing the purchase and installation of energy-saving products;
- "Photovoltaic Home": a loan for the installation of Photovoltaic Systems in homes;
- "Estia Green Home": a loan for the purchase, repair or construction of energy upgraded homes;
- DELOS "Green Energy" Mutual Fund;
- "NBG Socially Responsible International Fund SICAV".

The Bank participates in the JESSICA Programme (Joint European Support for Sustainable Investment in City Areas) by managing the Urban Development Funds for Attica, Western Greece, the Ionian Islands and the Environment through an agreement with the European Investment Bank. The total assets under management for the Programme amount to €83.3 million.

Finally, for yet another year the Bank contributed to the country's efforts to improve its environmental footprint by financing RES projects.

Relevant details and information are available in the 2011 CSR Report or on the website of the Group (www.nbg.gr).

# SECTION 3 INTERNATIONAL ACTIVITIES OF THE GROUP

## 3.1 THE GROUP'S INTERNATIONAL PRESENCE

In 2011, the markets where the Group is active presented an improved macroeconomic picture, with most countries posting positive growth. Notably in Turkey, business activity remained buoyant, with the financial sector growing further.

The Group's core profitability from its international business (excluding Turkey) was satisfactory, with profits before tax and provisions reaching €196 million. The concerted efforts to contain operating costs were successful, as general administration expenses decreased by 7% year on year and total operating expenses fell by 2%. Total assets topped €10.4 billion, while the ratio of loans (after provisions) to deposits stood at 128%, i.e. 11 percentage points lower than in 2010. It should also be noted that funding of the Group's SE European units by the parent company has fallen considerably, by €1.3 billion, over the past two years.

The steady growth of the Turkish economy enabled Finansbank to post positive results at all levels. Net interest income continued to perform at the high levels of 2010 totalling TL2,106 million in 2011, within a general environment of contracting margins. This achievement places Finansbank in the vanguard of Turkish banks in terms of interest margin, despite the adverse impact of the tight monetary policy and intensifying competition. Profit before tax and provisions reached TL1,441

million, while net profit topped TL849 million, down by 8% vis-a-vis 2010.

NBG handled the impact of the 2009-2010 recession by keeping a vigilant eye on the loan portfolios of its overseas units and adjusting their risk and liquidity management policies on a case by case basis. This effort focused chiefly on matching effectively the Group's strategy to current conditions, with an emphasis on close monitoring of credit risk and optimisation of returns on the portfolios.

Specific actions were undertaken to this effect, the most characteristic of which comprised restructuring and improvement of retail and corporate credit policies, homogenisation of procedures regarding monitoring and control of loan portfolios, adjustment of credit limits where circumstances so required, and intensification of proactive management of non-performing loan portfolios. At the same time, particular attention was given to supporting customers adversely affected by the downturn in activity in the countries in question by offering them the option to reschedule their debts.

#### 3.2 FINANSBANK SA

Finansbank's performance in all banking segments remained outstanding, generating strong profits for the Group. Its assets stood at TL50.5 billion, up 17% year on year, maintaining its position as the fifth largest private bank in Turkey.

In 2011, Finansbank's total loans reached TL36.8 billion, up 16% on 2010. Despite the credit expansion, its Capital Adequacy Ratio (CAR) stood at 17.6%, the highest ratio among its peers. Retail lending continues to be the key driver behind Finansbank's dynamic growth, pursuing an upward course at an impressive rate (up 19% on 2010). Total retail lending in 2011 amounted to TL20.3 billion, while business lending totalled TL16.5 billion, up 12% year on year, reflecting the general improved business sentiment in the country.

Loan delinquencies fell further to 4.8% of the total loan book, down by 103 basis points on 2010. The cost of provisions stood at 103 basis points in 2011, while the NPL coverage ratio stood at 77%.

As a result of the bank's strategy to broaden its deposit base, deposit growth was also strong, up by an impressive 22% on the previous year. At the end of 2011, the bank's loan-to-deposit ratio improved to a historic low of 113%.

Reflecting investor confidence in Finansbank and its prospects was the fact that in 2011 the bank successfully issued a 5-year Eurobond worth USD500 million, as well as a syndicated loan, also worth USD500 million.

On 31.12.2011, Finansbank's network reached 522 branches (20 more than in 2010) and 1,826 ATMs (from 1,574 in 2010), while the number of employees in the Finansbank Group fell to 12,045 from 12,824 in 2010. Growth in operating expenses was impacted both by expansion and partial restructuring of the Bank's network as well as the high rate of domestic inflation. However, its efficiency (cost/income) ratio stood at the low level of 52%, while return on equity reached 13.4% (in TL terms).

#### Finansbank - Retail banking

Continuing its rational approach to the geographical reach of its branch network in the country while also promoting penetration into new and larger market segments where the bank is already positioned or is considering entry, Finansbank strengthened its market shares in almost all its retail banking operations.

In 2011, total retail lending grew to TL20.3 billion, up 19% year on year. In mortgage lending it continued its dynamic performance, with a market share of 8.4%, as housing loans outstanding amounted to TL6.3 billion.

In line with market requirements and customers' changing needs, Finansbank launched new products (such as the Tax Amnesty Loan and the Golden Account) and made yet more options available to electronic users. Accordingly, its market share in personal loans topped 6.2% at the end of the year, from 5.6% in 2010.

The bank's flagship credit card, CardFinans, continues to consolidate and expand its position in the market, with 4.7 million cards in circulation at the end of 2011, gaining a strong market share of 14.2%. The volume of card transactions increased by 40% year on year from TL23.0 billion to TL32.0 billion, while their outstanding balances rose by 27%, reaching TL8.9 billion. The success of Finansbank's credit cards was recognised by Visa Europe, which awarded Finansbank the "2010 Visa Achievement Award".

For yet another year, Finansbank demonstrated the strength of trust and confidence it enjoys among its customers, as reflected in its market share in total deposits, which stood at 4.5%, up by 22% year on year.

#### Finansbank - Corporate banking

In 2011, total corporate lending reached TL16.5 billion, up by 12% year on year. Lending to SMEs also increased by 33%, with corresponding growth in their deposits.

Outstanding loans to medium-sized enterprises (with turnover between TL2 million and TL100 million) rose by 13%, with corresponding growth in the basic (+18%) and time (+25%) deposits of this category of customers. Points of service multiplied (from 84 to 255 throughout the country), while the 520 relationship managers excelled, achieving effective promotion of sales and capital management.

Applying its consistent and sound management model, Finansbank reaffirmed its status as one of the most dynamic players in the Turkish market. It raised over USD2 billion of capital from international markets under very good financing terms regarding interest rate and repayment term.

#### 3.3 UNITED BULGARIAN BANK (UBB)

In 2011, the Bulgarian economy registered progress, albeit at the low growth rate of 1.6%, as it was adversely affected by external factors, such as the slowdown in global economic activity and the sovereign debt crisis in the euro area, as well as weak domestic demand.

The key objective of UBB was to defend its capital base; as a result, its total CAR improved considerably from 12.8% in 2010 to 15.5% in 2011. In addition, by consistently developing programmes for the restructuring of its problem loans, it shielded the quality of its loan book.

At the end of 2011, UBB's assets stood at  $\leqslant$ 3.4 billion, down by 10% on the previous year. More specifically, its total loan book stood at  $\leqslant$ 2.8 billion, down by 13% year on year, with its respective market share standing at 10.4%, while retail banking deposits rose by 9%. As a result, the loan-to-deposit ratio improved further, standing at 113% from 133% in 2010. The Bank posted positive results, with its pre-tax profit totalling  $\leqslant$ 6.8 million, while the cost/income ratio stood at 42% at the end of the year.

In addition, UBB continued its restructuring programme for its branch, ATM and POS terminal networks. As a result of this streamlining process, several small, non-profitable units were closed down (222 units were in operation at the end of 2011), and ATM and POS networks were cut back (780 and 10,076 respectively). Furthermore, UBB stepped up efforts to leverage the

existing customer base for cross sales opportunities by using a state-of-the-art CRM platform.

Interlease EAD is one of the largest leasing companies in Bulgaria. In 2011, its pre-tax profit amounted to €5.2 million, while its cost/income ratio stood at 28%.

#### 3.4 STOPANSKA BANKA AD

In the first half of 2011, the economy of the Former Yugoslav Republic of Macedonia posted dynamic recovery mainly through growth in domestic demand, while GDP grew by 5.1%. However, in the second half of the year the escalation of the sovereign debt crisis in the euro area eventually dragged down the growth rate to 3.3% year on year. Credit expansion remained steady in the country, and the banking sector maintained a low-risk profile, based on its strong capital position.

SB's strategy focused on maintaining its high liquidity and capital base, while safeguarding the quality of its loan book and further containing its operating costs. In 2011, net pre-tax profit stood at €12.9 million, while total assets reached €1.2 billion (up 3.2% on 2010). After-tax ROA and ROE stood at 1.1% and 8.8%, respectively, while the CAR rose to the strong level of 17.9%, demonstrating that SB remains the most credible financial partner in the country, posting consistently sound results. This performance was recognised by the industry journal Finance Central Europe, which awarded the Bank the title of best bank in the country in terms of assets and capital strength.

In 2011, SB placed special emphasis on attracting new deposits. The confidence shown by households and businesses in the largest and healthiest bank of the country was translated into a 6% increase in total deposits with the opening of 97,000 new deposit accounts, and a loan-to-deposit ratio of 80% (below the sector average).

Moreover, emphasis was placed on provision of services via alternative channels (ATMs, e-banking, phone and internet banking), which rose by 70% in terms of transaction volumes year on year (corresponding to 20% of SB's total transactions). These results provide further stimulus to the bank to speed up its efforts towards implementing additional electronic operations and new services, and thereby retain its competitive advantage as a pioneer in specialised banking services.

#### 3.5 BANCA ROMANEASCA SA

In 2011, the Romanian economy showed clear signs of recovery, with output growing by 2.5%. The assets of Banca Romaneasca totalled €2.4 billion, while profit before provisions stood at €29 million in 2011. The Bank's market share of lending stood at circa 4%, though its share of deposits fell since the end of 2010.

In retail banking, BR promoted refinancing of loans to existing and new customers so as to limit the reduction in the loan book and help balance repayments. It also presented new credit card products and launched overdraft facilities, increasing business volumes significantly. New facilities and tools were added to the cards which, in conjunction with promotional campaigns and cross selling, contributed to the rise of both debit and credit cards, whose volume rose by 11% year on year.

On 31.12.2011, BR had a network of 134 branches and 154 ATMs, having closed down 12 small branches in the framework of curtailing operating costs (-5% year on year) and a targeted expansion of its presence in areas presenting increased business activity.

In corporate banking, the Bank enhanced its support to sectors engaged in green energy initiatives, financing, e.g., wind farms generating more than 25 MW, while it was also particularly active in trade finance for oil and natural gas.

BR continued to rank among the strongest banks in Romania in terms of risk management and solvency ratios, reflecting the health and vigour of its business model. The CAR ratio exceeded 24% at the end of 2011, while customers continued to show confidence in it (total number of customers increasing by 10% year on year).

Last, an agreement was signed with the EBRD for a credit line worth €100 million. BR used this facility to broaden its funding sources, respond to any risk of reduced liquidity, and mitigate potential risks arising from the Greek debt crisis.

#### 3.6 VOJVODJANSKA BANKA AD

The Serbian economy presented positive growth and significant signs of stabilisation during the previous year. In 2011, the Group's subsidiary in Serbia, Vojvodjanska Banka (VB), focused its efforts on two key areas:

i)The best possible management of the impact of the global financial crisis;

ii)Further enhancing its successful business model, chiefly by upgrading services offered.

To mitigate the effects of the crisis, an effort was made to implement new, improved credit risk management and control policies. At the same time, in its drive to reduce expenses, VB continued its cost-cutting strategy for a 3rd consecutive year (total reduction in operating and administration expenses in excess of 25%).

The bank's chief priority was to sustain liquidity and, despite strong headwinds, it succeeded not only in remaining self-funding but also in achieving a slight increase in deposits. In addition, in 2011 VB advanced credit facilities to SMEs by fully utilising a package of €50 million received from the EBRD. At the end of 2011, VB's loans and deposits totalled €682 million and €601 million, respectively. Losses before provisions amounted to €4 million, while net interest margin reached 415 basis units. Last, the Bank's CAR stood at 21%, almost double the 12% requirement of the Central Bank and well above the market average.

In 2011, VB continued its branch network restructuring programme; at the end of the year, it operated 118 units and employed 1,786 staff. It also continued to renovate old branches, open up new corporate centres and add new services, including bancassurance and broking products and custody services.

## 3.7 NATIONAL BANK OF GREECE (CYPRUS) LTD

In 2011, against a turbulent global financial backdrop and a deteriorating climate in the Cypriot economy, NBG Cyprus took swift and decisive measures in the framework of its budget and 3-year business plan 2011-2013, focusing on:

- Internal restructuring, which included an overhaul of services and units, centralisation of business operations, reorganisation of human resources and reduction of red tape, with a view to enhancing productivity.
- Consolidating its International Banking Units (IBUs), with the opening of a representative office in Moscow (March 2011) and enhancing the operations of the respective units in Cyprus.
- Offering new deposit products ("Centennial"), so as to enhance as far as possible the Bank's autonomy in terms of liquidity.
- The successful reorganisation of its branch network.

- Initiation of the rollout of a new T24 data processing system.
- Maintaining a strong Core Tier I ratio at 13.5%.
- Systematic efforts to contain costs.
- The radical reorganisation and upgrade of its NPL and loan workout units, so as to enhance effective management of loan books and minimise credit risk.

The bank's results for 2011, despite headwinds and a highly volatile environment, remained positive, with net profit before provisions totalling €24 million, while the cost/income ratio stood at 53%.

## 3.8 SOUTH AFRICAN BANK OF ATHENS (SABA)

South African Bank of Athens (SABA) posted a positive turnaround in performance in 2011, supported by a new strategy aiming at increasing lending to SMEs, in contrast to its former practice of focusing mainly on retail banking.

The implementation of the new strategy required realignment of infrastructures and curtailing of costs, which resulted in the closure of 3 retail units in 2011 and the opening of business banking offices. The number of Relationship Managers engaged in supporting and promoting business banking operations also increased.

SABA's total income from core banking activities amounted to  $\[ \le \]$ 9.4 million while losses after tax were limited to  $\[ \le \]$ 0.2 million. At the same time, the loan portfolio grew by 13% year on year.

## 3.9 INTERNATIONAL BRANCHES (ALBANIA EGYPT. THE UK)

In addition to its subsidiary banks, NBG continued in 2011 to support its international branches and branch networks.

In Albania, whose economy is highly exposed to developments in countries such as Italy and Greece, NBG's network of 27 branches posted a significant 5% increase in deposits, while its market share of retail banking operations amounted to 12.4%. In addition, cost-cutting efforts continued, with operating expenses falling by 11% and the resulting net profit before provisions standing at €5.4 million. Last, the Bank has set up plans to convert the branch network into an

independent subsidiary bank, a process that should be completed in the first half of 2012.

As in many other parts of the Arab world, in 2011 Egypt also experienced severe social and political unrest. As a result, the previous regime came to an end and a transitional government took over power. As was to be expected, the country's economy was not unscathed by events, and its growth rate—though remaining positive—slowed to 1.8% from 5.1% in 2010. Under these circumstances, further expansion of the network of 18 branches was suspended, while emphasis was placed on maintaining the current performance, chiefly in terms of liquidity and quality of the loan book.

NBG's London branch has been operating for over 100 years. For yet another year, in 2011, it focused on offering Trade and Commodity Finance services, chiefly to corporate customers.

Last, NBG continued to develop computer applications and banking and finance products in its international branches, with a view to improving the services provided and enhancing their competitiveness to the level of its other subsidiaries and, of course, the parent bank in Greece. By way of example:

- The task of converting the Credit Card and ATM systems to a new system in the Albanian and Egyptian networks was completed.
- A Business Continuity Plan—for the Albanian and Egyptian networks—was prepared and drafted.

SECTION OTHER NBG GROUP ACTIVITIES

#### 4.1 INSURANCE

Via its subsidiaries Ethniki Insurance and NBG Bancassurance, the Group offers a full range of retail and business insurance products and services on the domestic market.

Ethniki Insurance conducts its business in Greece through 13 branches, 196 sales offices, 4,200 insurance agents and 1,830 partner insurance agencies. Its products are also marketed via NBG's extensive branch network. Ethniki Insurance is also active in Romania via Societate Commerciala Asigurari Garanta SA, in Bulgaria via UBB-ALICO Life Insurance Co, UBB-Chartis Insurance Co and UBB Insurance Broker AD, and in Cyprus via Ethniki Insurance Cyprus and Ethniki General Insurance (Cyprus).

Under the Group strategy to enhance synergies, special emphasis is placed on designing and developing bancassurance products, which are being marketed through the Bank's extensive branch network. Bancassurance products provide: (a) insurance on properties purchased with mortgage loans, (b) life insurance and payment protection for mortgage and consumer borrowers, (c) investment insurance products paid for by a lump sum or periodic payments, such as "Pension Plus" and "Providing", and (d) other life insurance products for NBG customers.

In an extremely difficult year for the Greek economy, total life bancassurance production in 2011 decreased to €90 million from €162 million in 2010, as a result of the financial crisis, while property insurance premiums of borrowers were kept at €37 million in 2011, roughly the same level as in the previous year (2010: €36 million).

Ethniki Insurance posted an impressive improvement in its operating profit, with profit before tax and impairment for financial assets standing at €112 million in 2011 against zero profit in 2010.

This result was achieved mainly by close monitoring of the loss ratios in the life and car insurance sectors. exiting the loss-making credit sector, and reducing operating expenses through synergies with NBG.

In particular, the insurance loss ratio for the car insurance sector in 2011 stood at 49%, down by 16 bps year on year, while for the health sector it stood at 72%, down 5 bps. Ethniki Insurance has initiated renegotiation of its agreements with all hospitals and intends to put the DRG system into operation in the second half of 2012.

In addition, uncollected claims were reduced significantly with the implementation of more rigorous procedures, changing the credit policy, and the implementation of new collection procedures for life and car insurance premiums.

The positive performance outlined above was achieved despite the decline in premiums. Valid premium and policy levels for 2010 and 2011 are set forth in the table below:

#### PREMIUMS AND POLICIES

(€ millions)			
	2011	2010	%
Life	369	446	-17.2%
Car	297	383	-22.4%
Fire	95	108	-12.1%
Other General	53	74	-28.3%
Total	814	1,011	-19.5%

The company fully meets the regulatory capital requirements for 2011, in line with the effective regulatory framework, while it has designed an action and management plan to address any capital needs or other challenges that may emerge from the implementation of the Solvency II EU Directive.

The financials of Ethniki Insurance are presented in the following table:

#### **FINANCIALS**

(€ millions)	2011	2010	%
Total assets Profit before tax and impairment Investment impairment	2,885	3,776	-23.6%
	112	0	-
	-631	-41	1,439.0%

In view of the likelihood of further deterioration in the economic environment, Ethniki Insurance in 2012 will focus on its operating profitability, containing operating expenses, further restructuring of internal processes with a view to better managing and serving insurance policy-holders and agents, further fortifying its capital adequacy, and implementing its action plan for harmonisation with the new Solvency II supervisory framework directive.

#### **4.2 HOTEL BUSINESS**

The NBG Group is also active in the hotel sector via its Astir Palace Vouliagmenis Hotel, which is managed by Starwood.

In 2011, the adverse economic environment had a direct and significant impact on the number of flights arriving at Athens International Airport, posting a decline of 6.3% on the previous year, while average room prices in luxury hotels in Attica also fell slightly.

Against this backdrop, Astir Palace's performance in 2011 was satisfactory. The decline in annual turnover was mainly due to the fact that the Posidonia events, which in the previous year generated revenues of around €2.5 million, were not held in 2011. In addition, the streamlining of operating expenses helped contain general and administration expenses, while at the same time the investment in infrastructure in recent years continued to yield positive returns, as room occupancy improved on the previous year.

In 2011, the company invested €1.6 million in renovation works and plans as part of its overall investment strategy for the Aphrodite Hotel, the construction of a new conference centre and other facilities.

In 2011, turnover amounted to €28.7 million, down by 8% from €31.2 million in 2010. Despite the general negative climate, room occupancy at the Arion Resort & Spa and The Westin Athens remained stable, while revenue from rooms fell by 2.8%, reflecting a decline in the average daily price of 3.5%.

#### 4.3 REAL ESTATE

In 2011, the Group was active in the real estate sector via the Bank itself, as well as via its subsidiary NBG PANGAEA Real Estate Investment Company, within the framework of the Group's strategy to implement a single integrated real estate policy across the Group.

The Greek economic crisis did not leave the real estate market unscathed. In 2011, supply and demand were substantially lower than in the pre-crisis period, with a concomitant impact on sale prices, rent values and real estate returns.

NBG PANGAEA Real Estate Investment Company was set up in 2010 with a view to becoming an investment vehicle for investors seeking fixed income from dividends. Depending on prevailing market conditions, this specialised investment vehicle seeks to seize investment opportunities in the real estate sector in the wider region where the Group is active and, moreover, maximise the return on the Bank's substantial property portfolio.

At 31 December 2011, the company's real estate portfolio

comprised 242 commercial properties (mainly bank branches and office buildings) with a market value of €822.26 million, at highly visible commercial locations, most of which are leased to NBG.

The Bank's real estate affiliate Ethniki Kefalaiou SA has been appointed by the Greek State as administrator for the liquidation of the former Olympic Airways group of companies. During 2011, it successfully carried out a significant component of its assigned task, in respect of the sale of the aircraft owned by the company.

#### 4.4 COMPUTING SERVICES

Ethnodata provides IT, outsourcing, technical support and consulting services to the Bank and to other Group companies in Greece and abroad.

In November 2011, the merger, through absorption, of Ethnodata with its subsidiary Ethnoplan, which since 2000 had acted as the Group's consulting services company for all its SAP applications and solutions in Greece and abroad, was successfully completed. Ethnoplan was also responsible for the provision of installation services for the T24–Temenos Core Banking system in the Group's subsidiaries outside Greece.

With the consolidation of the Group's two IT companies, an improved Group Integrator for IT solutions has been created thus enabling the provision of top quality services for system implementation, support and management and IT solutions across the Group. The union of the two companies represents part of management's strategic plan to generate synergies at all levels and forge the conditions needed to develop advanced IT solutions and services through economies of scale and technology concentration.

In 2011, Ethnodata expedited key software development and advisory services projects in the Bank and other Group companies, including:

- 1) Provision of integrated solutions in important projects, such as the development of the Bank's i-bank Mobile Banking service. Note that NBG was one of the first domestic banks to provide easy and instant banking transactions through smartphones. Furthermore, a new system for the management of consumer loan requests was designed on the basis of the latest technology. In addition, new systems have been approved and initiated to enhance the Bank's business workflows in the loan product sale procedure. Last, new functions were added to the bancassurXance application while the retail claims management system (Qualco Collections) was also upgraded.
- Provision of outsourcing and advisory services.
   Specifically, support to critical business areas was continued and critical systems were further developed

and maintained, including systems for the Bank's custodian services, treasury activities, and loan/time deposit/cash management systems (IRIS system). In addition, a number of other projects were successfully completed, including Anti Money Laundering (AML) systems for National Security Investment Services and subsidiaries of the Group (in FYROM, Albania and Serbia), as well as the IT system for compensation payments of the Hellenic Deposit and Investment Guarantee Fund.

- 3) Provision of integrated SAP solutions to meet backoffice needs in the context of key projects, including:
  - a) deployment of an integrated SAP CRM system for Banca Romaneasca at service points in its branch network and in its call centre, aiming at targeted communication with customers;
  - b) development of an SAP CRM job description record and monitoring system and deployment of a Training Management application for Vojvodjanska Banka;
  - deployment of a procedure for the purchase of supplies, services and fixed assets as well as the management of inventories and contracts with suppliers, for the same bank;
  - d) deployment of an integrated SAP MIS system for handling data and generating management reports (e.g., AML, Loan Book Management) at NBG branches in Albania;
  - e) deployment of General Accounting practices (covering IAS, Local Accounting Standards and the Accounting Standards for Group consolidation), Fixed Asset Management, SRM, and non-factoring CRM for factoring companies of the Group.
- 4) Deployment of the T24-Temenos Core Banking system at UBB, Stopanska Banka, and NBG London, and changes in the Vojvodjanska Banka branch network.

As part of its strategic plan, Ethnodata has made a number of dynamic investments in pioneering IT fields, such as business process management systems, workflow management systems, automated payment systems, voice response systems, and smartphone systems for mobile banking and mobile payments & mobile trading.

Technological innovation is the key factor behind Ethnodata's growth, and is implemented by its top-class team of IT experts, offering products, services and IT solutions complying with ISO 9001:2008 and ISO/IEC 27001:2005 specifications. The said certification concerns software design, development and maintenance, and IT support services, and is updated on an ongoing basis.

Following the merger, the staff at the Ethnodata numbers 492 employees, compared with 357 the previous year.

# SECTION 5 RISK MANAGEMENT & CORPORATE GOVERNANCE

#### 5.1 GROUP RISK MANAGEMENT

The NBG Group applies best risk management practices in line with the guidelines and supervisory requirements set out by the Basel Committee for Banking Supervision, the European Committee of Banking Supervisors, the Bank of Greece and the Capital Market Commission, together with the decisions of the relevant bodies overseeing the Group companies.

The Group's risk management framework is supervised by the Board's Risk Management Committee (RMC), which oversees all the Group's risk management functions. All Group risk management units report to the Group Risk Control & Architecture Division and the Group Market & Operational Risk Management Division, headed by the Chief Risk Officer.

The Group's A&L and risk management policies aim at composing the balance sheet in a manner that, on the one hand, contains the level of liquidity risk and exposure to exchange and interest rate risk and, on the other, enables the Group to leverage the opportunities offered by the market for profitability.

The Regulatory Compliance Unit is responsible for all matters relating to regulatory compliance, including current Greek and European legislation and supervisory regulations.

The risk management framework is complemented by the Internal Control-Audit Unit, which acts as an independent control body that ensures the effectiveness of the risk management framework and the control environment, and reports via the Board's Audit Committee to the Board of Directors of the Bank.

#### Market risk

To manage market risk effectively, the Bank estimates on a daily basis "Value at Risk" (VaR) for its aggregate trading and available-for-sale (AFS) portfolio and the various risks entailed therein (interest rate, equity, and foreign exchange risks). The VaR estimates refer to a one-day holding period and a 99% confidence interval.

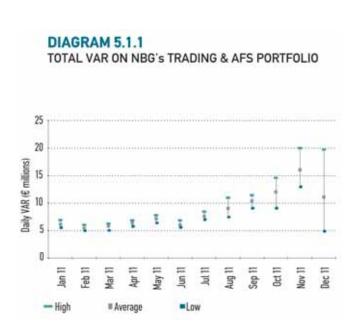
At Group level, the monitoring of market risk focuses primarily on the trading and AFS portfolio of Finansbank. Accordingly, to estimate and manage efficiently risk undertaken, Finansbank calculates VaR on a daily basis for its aggregate portfolio.

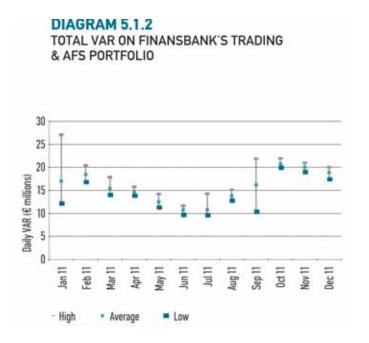
Since the end of 2009, NBG has been making VaR estimates on a daily basis. These estimates include the Bank's portfolios and the corresponding portfolios of Finansbank. The VaR estimates concern the overall market risk in the loan books as well as the various individual risks (i.e. interest rate, equity and forex risk). The market risk assumed by other subsidiary banks of the Group is relatively low in comparison with the risk contained in the portfolios of NBG and Finansbank.

In 2011, the total VaR estimate for the Bank's portfolio ranged between €4.8 million and €19.97 million, while the average for the year was €8.6 million (DIAGRAM 5.1.1). Fluctuations in the total VaR reflect mainly changes in interest rate, equity and forex risk levels, as well as their correlation with one another. However, as the analysis below indicates, the most significant risk contained in NBG's portfolio is interest rate risk.

The VaR on NBG's interest rate risk was impacted decisively by the volatility of interest rates and the restructuring of the Bank's debt securities portfolio. During H2.2011, euro interest rate volatility increased substantially, peaking in Q4. This development reflected the reduction in the yield on benchmark Bunds, as well as the fact that in the context of the ongoing fiscal crisis investors were seeking safer havens in which to place their funds. Accordingly, the Bank's interest rate risk VaR increased.

Correspondingly, in 2011 the VaR on Finansbank's Trading & AFS portfolio ranged between €9.6 million and €27.1 million, at an average of €15.8 million (DIAGRAM 5.1.2).





The most significant risk in the Finansbank portfolio derives from fluctuations in interest rates. Finansbank's interest rate VaR in 2011 ranged between €9.7 million and €26.6 million, while the average for the year was €15.6 million. In the early part of the year, the yield on Turkish government-issued debt securities in TL increased; as a result, their volatility increased and the VaR stood at high levels. Thereafter, as interest rates remained at the same levels through to the end of H1, there was a de-escalation in the respective volatility, and the VaR gradually declined. However, in Q4.2011 the yields on the government debt securities climbed further, pushing up volatility and Finansbank's interest rate VaR.

At Group level (NBG and Finansbank), the VaR on the trading and AFS portfolio ranged between €10.2 million and €30.7 million, while the average over the year was €17.2 million. The interest rate VaR ranged between €9.3 million and €32.2 million, with the average at €16.5 million. The equity risk VaR ranged between €1.7 million and €7.3 million, with the average at €3.9 million, and the FX VaR ranged between €0.7 million and €2.7 million, with the average for the year at €1.3 million.

To control and manage the Bank's risk, we have set specific VaR limits, which cover both individual risks (interest rate risk, equity risk, FX risk) and total market risk. The approved limits concern NBG's aggregate trading and AFS portfolio. A similar framework of VaR limits is in place for Finansbank's portfolio.

To verify the reliability of its internal model for measuring market risk, the Bank conducts back-testing, which consists of a comparison of the VaR estimated by the model with the corresponding change in value of the portfolio on which the estimate was based for the period in question. In 2011, out of a total of 251 working days, the number of times the estimated VaR was exceeded was just 2. A daily back-testing programme is carried out also by Finansbank, which in 2011 recorded 7 VaR overshoots in its portfolio.

The daily VaR estimates refer to "normal" market conditions. However, supplementary analysis is necessary for capturing the potential loss that may be incurred by the Bank under extreme and unusual conditions in the financial markets. Accordingly, the Bank carries out stress testing on a weekly basis, calculating the profit/loss in the trading and AFS portfolio in the event of extreme movements in the markets.

#### Credit risk

The Group ensures that it implements the highest standards of credit risk management and control. Credit risk arises from an obligor's (or group of obligors) failure to meet the terms of any contract established with the Bank or one of its subsidiaries. Accordingly, in line with its Risk Management Strategy, the parent Bank sets the standards for formulating all its models for predicting, offsetting and managing the credit risk assumed by NBG subsidiaries in Greece and abroad, and determines the guidelines for developing the methodology for calculating the key risk parameters for each category of exposure in corporate and retail banking business.

The Bank uses different credit risk rating systems for its various portfolios. Credit risk rating systems are implemented to ensure reliable borrower rating and therefore optimum decision-making on credit policyrelated matters. Furthermore, credit risk estimation models are implemented to generate statistical estimates of expected loss (EL) by calculation of risk parameters, i.e. probability of default (PD), loss given default (LGD) and exposure at default (EAD).

#### A. NBG

#### Business portfolio

NBG has developed a ratings system for its business portfolio, which has been used, following accreditation by the Bank of Greece, to quantify risk parameters and facilitate the application of the Internal Ratings-Based Approach (IRBA) for calculating capital requirements against credit risk in the said portfolio.

The rules for rating business borrowers (obligors) are set out in detail in the Credit Policy for the business portfolio. Briefly, the PD ratings scale contains 22 grades, 19 of which correspond to borrowers who have not been in default and 3 to borrowers who are or have been in default. Different exposures against the same borrower are rated in the same grade, regardless of the differences between the various forms of credit (i.e., as regards the collateral provided). The procedure is carried out on, at least, a yearly basis, and whenever new information or financial data on the borrower comes to the Bank's notice.

The Bank uses four validated models for rating business obligors, which, since October 2010, have been applied via the Risk Analyst (RA) internet platform and are backed, when needed, by the ratings of international rating agencies such as Moody's Investors and Standard & Poor's (S&P):

TABLE 5.1.1 RANKING ON NBG SCALE

Obligor rank	Average PD (%)	S&P scale equivalent
1	0.01	AAA
2	0.03	AA+
3	0.05	AA
4	0.07	AA-
5	0.10	A+
6	0.17	A
7	0.26	A-
8	0.41	BBB+
9	0.58	BBB
10	0.82	BBB-
11	1.30	BB+
12	2.30	BB
13	3.73	BB-
14	5.41	B+
15	7.65	В
16	12.00	B-
17	16.00	CCC
18	20.00	CC
19	25.00	С
20 - 22	100.00	D (Default)

DIAGRAM 5.1.3 BREAKDOWN OF BUSINESS BORROWERS BY MODEL

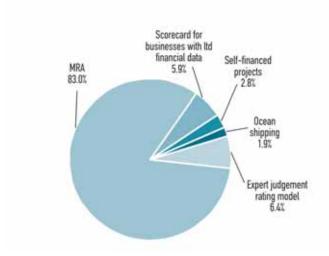
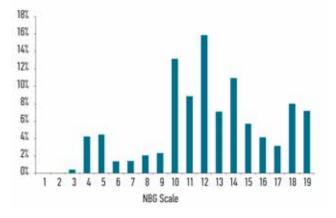


DIAGRAM 5.1.4 BREAKDOWN OF AGGREGATE BUSINESS CUSTOMER BALANCES AT 31.12.2011



- 1. All businesses with full financial data are rated using Moody's Risk Advisor (MRA).
- 2. Borrowers that comprise special cases (such as newly established firms without full financial data, consortiums of constructors, insurance companies, associations) are rated using an Expert Judgment Model.
- 3. Credits for project finance and object finance are rated using two simplified slotting criteria models.
- 4. For firms that belong in the business loan portfolio but which keep B-class account books, a Scorecard, developed in-house in 2010, for businesses with limited financial data is used.

Using data at 31 December 2011, DIAGRAM 5.1.3 sets out the total exposures against businesses, as per the said ratings.

Using data at 31 December 2011, DIAGRAM 5.1.4 presents the business lending of the Bank for the 19 grades of the internal rating scale, including lending to SMEs and exposures to credit institutions.

The diagram indicates that 53.8% of the exposures are rated 12 or higher, which is equivalent (in PD terms) to Standard & Poor's BB rating. Regarding exposures to business customers, 53.4% of the total are rated 12 or higher (DIAGRAM 5.1.5). Note also the dispersion of business clients across the various categories, with no concentration over 30% in any single rating category.

Ongoing measures to improve portfolio quality have led to the introduction of credit limits per borrower (obligor limits), in line with the customer's credit ratings.

Relative to the previous year, the Bank's business portfolio across the various sectors of economic activity continues to be well dispersed and to not present significant concentration in any one industry, thus serving as a buffer against some of the shocks emanating from the international environment. The relatively higher concentration in the Transport, Warehousing & Telecom market (18.8%) is explained by the fact that this category includes lending to shipping, while the Wholesale Trade market (14.4%) includes a large number of companies working in differing activities that go to make up the sector (DIAGRAM 5.1.6). Last, note that within the framework of Basel Pillar II the Bank carried out a project for measuring industry concentration risk. The results of this project showed that there is satisfactory dispersion of risk across industries.

#### Retail banking

Management of credit risk in the retail portfolio begins with the approval procedure, which is fully centralized. Every request for financing is assessed using special application scorecards. These statistical models follow well-established international methodologies and are based on historical data held by the Bank, while their predictive power is monitored systematically.

Thereafter, throughout their duration, the behaviour of all retail exposures is monitored on a regular basis and at a central level, reports are prepared on the quality of the loan books for review by management and the credit divisions concerned, and measures are proposed for dealing with credit risk in cases where this is deemed necessary. The tools used for monitoring and managing the retail banking portfolio are default ratios (for 30 to 180 days past due), vintage analysis, and default rates by product or portfolio. These regular analyses are essential for calculating Expected Loss (EL), which comprises the basis for making forecasts for all the retail portfolios.

The various portfolios, their quality and characteristics, are discussed below.

#### Mortgage lending

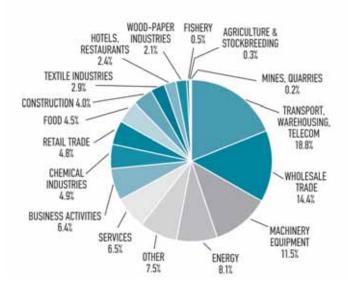
The mortgage lending portfolio represents the largest share of NBG's loans and advances to customers (total exposure: €19.8 billion at 31 December 2011). Accordingly, this lending category is subject to close monitoring and high-level analysis on an ongoing basis. While the Bank has redoubled efforts to collect debt in arrears, applies strict criteria in the loan approval process, and has stepped up debt restructuring arrangements for borrowers facing difficulties in repaying their dues, the impact of the adverse economic climate is clearly reflected in the housing loan delinquencies ratio for 2011.

As with the business portfolio, since the start of 2008 the Bank has applied the IRBA for estimating capital requirements for credit risk in respect of mortgages. Accordingly, all housing loans are ranked in groups on the basis of data regarding the borrower, the credit, and potential default (PD) status at the time of categorisation. Specifically, the model (approved by the Bank of Greece) for estimating PD classes loans in 14 groups, 5 of which concern loans granted within the past 12 months, while the other 9 concern older loans that are already displaying signs of "maturity". Each of these groups has been assigned a different PD rating, which was updated within the past year after recent grading of the model.

A breakdown of total mortgages in December 2011 is

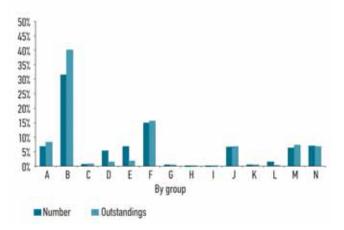
#### DIAGRAM 5.1.5 BREAKDOWN OF BUSINESS CUSTOMER BALANCES AT 31.12.2011 25% 20% 15% 10% 5% 0% 3 5 7 8 9 10 11 12 13 14 15 16 17 4 6 **NBG Scale**

# DIAGRAM 5.1.6 BREAKDOWN OF BUSINESS EXPOSURES BY SECTOR



5

DIAGRAM 5.1.7
MORTGAGES: NUMBER & OUTSTANDINGS



presented in DIAGRAM 5.1.7, where groups have been rated in order of potential default (from A to N). It can be seen that nearly a third (31%) of mortgages is rated in the low credit risk group B, while 50% displays PD of less than 1% (groups A to E).

As part of the Bank's ongoing endeavours to enhance and update its risk parameter estimation models, it developed a new model for estimating PD and LGD. These new models estimate PD and LGD with greater precision and, accordingly, have been submitted to the Bank of Greece for approval so as to be put into use as soon as possible for calculating capital requirements.

For the estimation of LGD a full model was developed based on loan duration, product type, borrower behaviour (e.g. if the loan history contains any payments in arrears) and maturity ratios. The methodology used to develop the model enables the Bank to use a 15-year debt collection horizon (DIAGRAM 5.1.8).

#### Consumer lending

During the course of the year consumer lending presented a deterioration in quality. This reflected, on the one hand, the decline in the rate of consumer loans granted relative to previous years and, on the other, the impact of the global economic slowdown.

DIAGRAM 5.1.8
HOUSING LOAN RECOVERY RATES

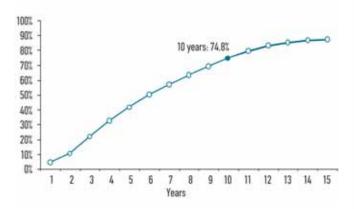
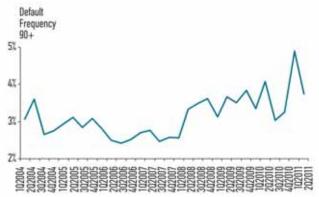


DIAGRAM 5.1.9 FIXED-TERM CONSUMER LOANS VINTAGE ANALYSIS – 6 MONTH LIFE



Nevertheless, even closer monitoring of the portfolio and the launch of loan products designed to reschedule outstanding debts succeeded in reducing the rate at which customers defaulted on loan payments within the first six months to below 5% (DIAGRAM 5.1.9).

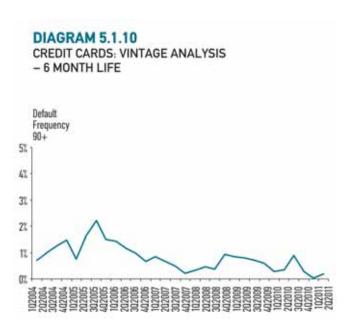
Delinquencies in credit card repayments have also increased. Nevertheless, there was an improvement in the frequency of default on recently granted credit cards of 6 months life, mainly because of the aforesaid enhanced control and monitoring mechanisms, the much stricter approval criteria applied from early 2009 onwards, and the offering of debt rescheduling products (DIAGRAM 5.1.10).

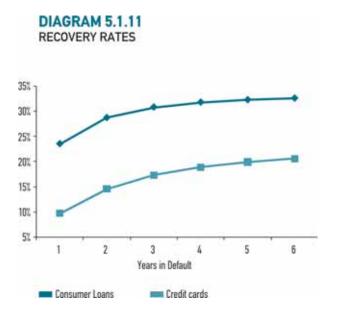
Due to the ongoing recession, the rate of recovery of +90 dpd consumer and credit card debt has declined (DIAGRAM 5.1.11).

#### **SMEs**

Credit to SMEs posted a decrease in 2011, while delinquencies increased, reflecting the adverse economic climate.

As DIAGRAM 5.1.12 shows, 45.2% of the aggregate exposures are rated equal to or higher than 15 which, in PD terms, corresponds to B on Standard & Poor's





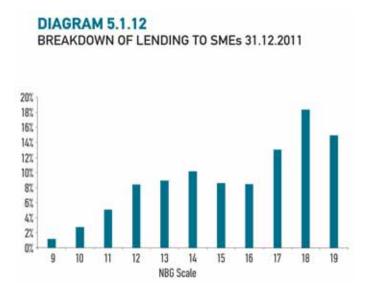


DIAGRAM 5.1.13
BREAKDOWN OF FINANSBANK'S BUSINESS
BORROWERS BY RATING MODEL



rating scale. This is considered satisfactory, since the portfolio is comprised of businesses with turnover below €2.5 million (sole proprietorships, limited and unlimited partnerships keeping category B account books).

Assessment of all credit applications for the purposes of both the initial credit review and subsequent renewals of credit limits is based on the SME rating model. This model was revised in 2009, with the addition of an independent unit that reviews the customer's behaviour in respect of all his accounts and generates a "behavioural score" which, since the end of 2010, has been used by the relevant credit unit during the credit approval process.

#### **B. NBG SUBSIDIARIES**

The standards for risks undertaken by the Group's subsidiaries and the guidelines for calculating the key risk parameters in business and retail banking are set centrally by the Bank, which also reviews regularly and approves, when necessary, the models (for evaluating loan applications or behavioural parameters) developed by the relevant units of the subsidiaries in question.

#### Corporate portfolio

Specifically, for the Group's largest subsidiary, Finansbank, DIAGRAM 5.1.13 presents the distribution of obligors by rating model.

In assigning credit scores to its corporate borrowers Finansbank uses the Moody's Risk Analyst model, which was recently graded in view of the planned inclusion of the corporate loan book in the IRBA for the calculation of capital requirements (Basel II), as well as the Small Business Credit Scoring model.

90% of lending and 76% of obligors (according to data at 31 December 2011) is rated using Moody's Risk Analyst and, as shown in the diagram, continues to display good dispersion of clientele across the various scales without high concentration in any one single category.

#### Retail banking

The largest part of the retail banking balance is held by Finansbank (73%), followed by United Bulgarian Bank (12%) and Banca Romaneasca (9%). The other two subsidiary banks, Stopanska and Vojvodjanska, hold lower shares (DIAGRAM 5.1.14).

In 2011, Finansbank increased its share as a result of the high growth in retail lending (19%). The default ratio (+90 dpd) for Finansbank stabilised in 2011, as was also

observed in 2010. This stabilisation reflected, on the one hand, the measures implemented in the loan approval and loan recovery processes and, on the other, the improvement in the Turkish economy.

By contrast, UBB (the second largest banking subsidiary of the Group in terms of loan outstandings) presented the highest +90 dpd ratio of all the subsidiaries, deteriorating throughout the course of 2011, though posting an improvement towards the end of the year. This was due in part to the substantial decline in lending balances (-8%) resulting from the ongoing slowdown of the Bulgarian economy, and also to the strict approval criteria deployed by the Bank in the context of its tighter credit policy.

Banca Romaneasca's default ratio also moved upwards during 2011, reflecting the adverse economic climate in Romania. Loan default was also high at Stopanska and at Vojvodjanska (the latter reported a high delinquency rate, although its share of the lending balances is only small).

#### Counterparty risk

The Group faces counterparty risk from the OTC transactions and the repo agreements in which it engages, as well as its interbank placements. Its commercial transactions also entail counterparty risk.

Counterparty risk is the risk that a counterparty will fail to meet his contractual obligations. To monitor and manage this risk effectively, the Group has established appropriate counterparty authorisation limits, which take as their basis the maximum acceptable limits for risk assumption and the business needs of each subsidiary, as well as the Group as a whole.

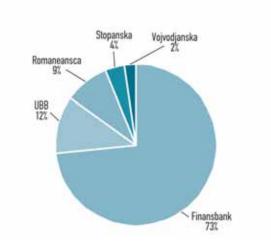
#### A. NBG

NBG's interbank market transactions with financial institutions entail counterparty risk. To minimise this risk, the Bank has established and assigned counterparty risk limits for financial institutions primarily on the basis of their credit ratings. The risk limits are expressed in "risk units", which are converted into nominal values on the basis of specific risk weights for each product category.

The credit ratings are provided by Moody's and Standard & Poor's. The international financial institutions authorised to carry out interbank market transactions with NBG are banks which, for the most part, are rated AAA to BBB- by S&P.

In its interbank placements NBG follows a conservative approach. Accordingly, it allows only O/N transactions with Greek banks and three months maximum for transactions with international banks. At 31 December 2010, NBG's interbank placements were for the most

DIAGRAM 5.1.14
BREAKDOWN OF RETAIL BANKING BALANCES



part intra-Group, with only very few exceptions—chiefly with Greek financial institutions.

In addition, in the context of the Bank's endeavours to manage and reduce counterparty risk it has put into effect various agreements (Credit Support Annexes (CSAs), GMRAs) with virtually all its counterparties. These contracts set out the terms for reciprocal provision of collateral (cash or securities) on a daily basis, in line with the current value of each product, thereby minimising counterparty risk in its OTC, repos and reverse repos dealings. The level of risk per counterparty depends on the net market value of the transactions involved.

NBG is also active in international trade. For trade that entails counterparty risk for the Bank, NBG has set limits that cover both the funded and unfunded transactions carried out by its relevant units.

#### B. FINANSBANK

Finansbank is the Group entity with the highest level of exposure to counterparty risk. The risk undertaken by Finansbank in its interbank dealings derives mainly from its placements in financial institutions, OTC derivative products, and repos and reverse repos.

To effectively manage this risk, Finansbank has set up a framework of counterparty limits. These limits are expressed both in nominal amounts and in risk units.

In its interbank placements Finansbank sets a maximum of one week on the duration of its transactions, with the exception of transactions with subsidiary banks of the Group, which can be up to three months' duration.

In addition, to reduce counterparty risk Finansbank has signed agreements (Credit Support Annexes—CSAs, GMRAs) with its key counterparties, exchanging the collateral required on a daily basis and thereby minimising counterparty risk in its OTC, repos and reverse repos dealings.

Finansbank is also highly active in international trade. For trade that entails counterparty risk for the bank, it has set similar limits as those set by NBG, to cover funded and unfunded domestic and international trade.

#### C. OTHER GROUP BANKS

The counterparty risk undertaken by the aforesaid Group banks is relatively low and derives mainly from their transactions in the interbank market. These transactions involve interbank placements and currency trades and, in some cases, repo dealings.

To manage this risk, the banks in question have set corresponding limits. These limits are expressed in nominal values and their conversion to risk units is carried out in line with specific weights that are the same for all the said subsidiaries.

Apart from the limits set for transactions with local and Greek banks, the counterparty risk limits in the interbank market concern mainly high-rated financial institutions based in low or very low risk countries.

The maximum duration of the interbank placements of the said banks was three months.

The said subsidiaries undertake only a small level of counterparty risk as part of their commercial transactions. To manage this risk, limits have been set for their funded and unfunded transactions, in line with the activity of the subsidiary in question.

#### Corporate bonds

The Bank holds a global and Greek corporate bond portfolio. To manage the corresponding risk, limits for the purchase and holding of such bonds have been set in line with the following parameters:

- credit rating
- corporation issuer
- industry and issue
- origin of issuer

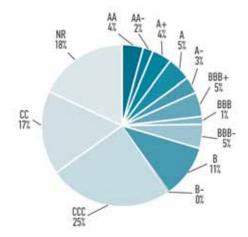
The Bank's placements in corporate bonds that are rated by international rating agencies (Standard & Poor's, Moody's) amounted to 82% of its aggregate corporate bond portfolio, with 18% rated A or higher (DIAGRAM 5.1.15). The decline relative to the previous year (27.4%) reflects the downgrade of a part of the global corporate bonds held by the Bank.

#### Country risk

Country risk involves various risks that may be generated at country level as a result of political or economic problems, whether in the form of sovereign default risk or in the form of convertibility risk (i.e. the risk that a local currency cannot be freely exchanged/delivered for another freely exchangeable "hard" currency) and transfer risk (i.e. the risk that it may not be possible to send a currency out of the country). Accordingly, country risk includes every kind of cross-border financing in a country, whether the financing concerns central government, financial institutions, businesses or individuals

The on- and off-balance sheet items that are relevant to country risk are as follows:

DIAGRAM 5.1.15
BREAKDOWN OF CORPORATE BONDS
BY CREDIT RATING (30.12.2011)



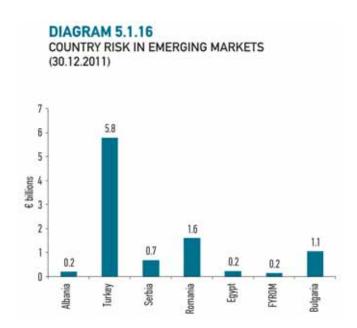


TABLE 5.1.2
CREDIT RATING FOR EMERGING MARKETS

Country	Moody's	S&P's	Country risk as % of total Group assets 30,12,2011
Albania	B1	B+	0.20%
Bulgaria	Baa3	BBB	0.99%
Romania	Baa3	BB+	1.52%
Serbia	C4: 802	BB-	0.65%
FYROM	201 12 27	BB	0.15%
Turkey	Ba2	BB	5.42%
Egypt	Ba1	BB+	0.23%
S. Africa	A3	BBB+	0.06%
Total			9.22%

- holdings of government debt securities (sovereign risk):
- interbank transactions/placements, and equivalent risks from interbank derivative transactions (cross-border risk):
- loans to businesses or financial institutions, holdings of corporate bonds, and financing of large projects (cross-border risk);
- funded and unfunded commercial transactions (cross-border risk), and
- shareholdings in subsidiary banks based abroad.

The Group's exposure to country risk is monitored on a daily basis, in line with the framework outlined above, and is concentrated primarily in the countries where the Group has a business presence, i.e. SE Europe, Turkey, Egypt and South Africa. At 30 December 2011, the NBG's exposure to these markets amounted to 9.22% of the total assets of the Group (DIAGRAM 5.1.16, TABLE 5.1.2).

#### Operational risk

Operational risk is the risk that loss will be incurred as a result of inadequacy or failure of internal procedures and systems, either because of human factors or external events. In line with the Basel II definition employed by the Bank, operational risk includes legal risk and regulatory compliance risk.

NBG is fully aware of the significance of operational risk. Accordingly, since 2005, it has focused on developing and deploying a comprehensive operational risk management framework so as to meet not only the qualitative and quantitative criteria for implementation of the Standardised Approach, but also, over a long-term horizon, to adopt the Advanced Measurement Approach for calculating associated capital requirements.

In endeavouring to enhance its operational risk management, since 2010 NBG has developed and deployed the OpVar software application, initially at NBG (including its international branch network), Finansbank, Ethniki Leasing, and Ethniki Factors. With a view to upgrade and uniformly manage operational risk at Group level, in 2011 the use of the new software application was expanded to the remaining Group companies, i.e. Banca Romaneasca, the UBB Group (i.e. UBB, UBB Asset Management, UBB Factoring, UBB Insurance Broker), Stopanska Banka, Vojvodjanska Banka, NBG Leasing Belgrade, Interlease Sofia, NBG Cyprus, National Securities, and NBG Asset Management.

In 2011, the annual phase of implementation of the Operational Risk Management Framework was deployed by the Bank via the OpVar software application for a second consecutive year. The key constituents of this framework are outlined below:

- to identify, assess and monitor operational risks;
- to define effective risk mitigation action plans;
- to identify and monitor NBG's Key Risk Indicators;
- to collect loss-making event data.

Note that in 2011, workshops took place for a second consecutive year dedicated to the analysis of various scenarios; expert analysts set out a systematic procedure for recording a series of risk-weighted assessments of the frequency at which operational losses with serious impact occur.

In 2011, the operational risk officers of the Group's companies that have adopted the new software application attended a related seminar. Accordingly, the deployment of the framework via OpVar was completed at eight banking subsidiaries abroad and four domestic subsidiaries.

With regard to the collection of data on loss-making events, particular emphasis was placed in 2011 on early identification and reporting by specialised units of the Bank, leading to enrichment of the respective database. A breakdown of loss-making events by regulatory category is presented in DIAGRAM 5.1.17.

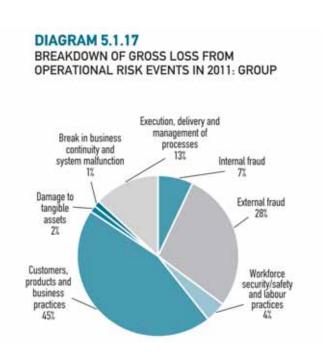
NBG uses the Standardised Approach for calculating capital requirements for operational risk at Group level. In 2011, regulatory capital requirements for operational risk amounted to €511.2 million.

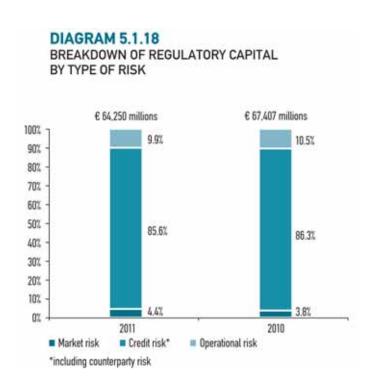
Likewise, during 2011, NBG estimated operational risk capital requirements for NBG and Finansbank, in line with the assumptions of the Advanced Measurement Approach (AMA).

The AMA was used for calculating internal capital for operational risk (as per Basel Pillar II) with a view to ensuring capital adequacy and compliance of the Bank with supervisory requirements.

#### Capital adequacy

Since January 2008, capital adequacy ratios have been calculated in accordance with the new supervisory framework of Basel II. Following a capital injection guaranteed by the Financial Stability Fund as part of the recapitalisation programme for Greek banks, the







**DIAGRAM 5.1.19** 

BREAKDOWN OF REGULATORY CAPITAL AGAINST CREDIT RISK & COUNTERPARTY RISK BY TYPE OF EXPOSURE (31.12.2011)

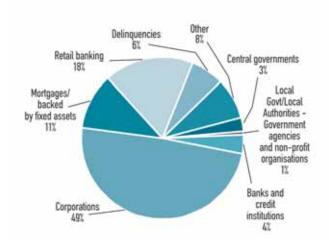
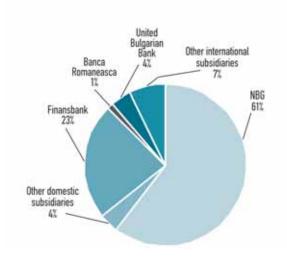


DIAGRAM 5.1.20 BREAKDOWN OF GROUP RISK WEIGHTED ASSETS (31.12.2011)



Group's capital adequacy ratios (Total and Tier-I) at 31 December 2011 stood at 8.3% and 6.3% respectively, considerably lower than a year earlier, reflecting the particularly unfavourable impact of the adjustment in value of bonds and other claims of the Bank against the Greek State (losses of €11.8 billion before taxes). It should be noted that despite the Group's historic losses, these CAR ratios are clear of the limits of 8% and 4% set by the Bank of Greece.

NBG's efforts to restructure its domestic loan book, reduce high-risk positions and substantially limit new reimbursements led to the decrease of the Group's risk-weighted assets by approximately €3 billion. DIAGRAM 5.1.18 shows the distribution over time of the Group's risk-weighted assets by risk type.

86% of total capital requirements concerns credit risk in the banking book, while a substantial portion of capital requirements of around 10% concerns operational risk.

A breakdown of the Group's risk-weighted assets by type of exposure is presented in DIAGRAM 5.1.19.

The distribution of total risk-weighted assets by subsidiary (DIAGRAM 5.1.20) indicates that 84% originate from NBG & Finansbank, while 4% and 1%, respectively, originate from UBB and Banca Romaneasca.

#### 5.2 REGULATORY COMPLIANCE

The challenges for the Greek banking system became even more intense in 2011. Deteriorating macroeconomic conditions in general impacted the conditions under which the banking system operates, thus rendering the Group's compliance function decisive in terms of applying preventive measures that enable the Group to adapt swiftly to a constantly shifting regulatory environment.

In this light, and in view of NBG Group's cross-border activities, Group Regulatory Compliance (GRC)—perceiving the particularly adverse economic climate—undertook an active advisory role in managing regulatory risks and forestalling the likelihood of related sanctions.

In its mission to safeguarding the good name and credibility of the Bank and the Group among shareholders, customers, investors, and supervisory and other independent authorities, GRC also worked in 2011 to facilitate rapid adaptation to new legal and regulatory provisions and to prevent and avert risks related to potential breach of existing legislative and regulatory provisions.

With a view to streamlining and managing more effectively investigation requests submitted by supervisory, public and judicial authorities, as well as by individuals, the Bank decided to place such investigations under the competence of GRC, thereby enhancing smooth cooperation with the Authorities. It should be noted that the majority of the requests handled by GRC within 2011 were filed by the Financial Crime Prosecution Unit (SDOE) and that in the first 7 months of 2011 the number of such requests increased by 550% year on year.

Following reorganisation of GRC, its current organisational structure and competences are as in the scheme beside.

An important area of activity is the Group's effort to maintain continuous compliance with the current legislative and regulatory framework in the areas of consumer credit, capital and money market operations, investment services, transparency, relations and conduct vis-a-vis customers, corporate governance, conflict of interest, prevention and identification of money laundering, protection of data privacy, internal control systems and other legal risks.

The Group attaches particular importance to preventing the use of its services for money laundering and the

#### **GROUP REGULATORY COMPLIANCE DIVISION**

GROUP COMPLIANCE
POLICY DEVELOPMENT
IINIT

Development of compliance policies at Group level & management of all compliance issues (except AML/CFT)

GROUP COMPLIANCE MONITORING UNIT

Monitoring and review of the Group's compliance with the regulatory and legal framework each time applicable (except AML/CFT)

GROUP AML/CFT POLICY DEVELOPMENT UNIT

Development of AML/CFT policies & monitoring and review of compliance at Group level with the regulatory and legal framework each time applicable

GROUP AML/CFT MONITORING SYSTEM UNIT Management of Suspicious Transaction Reports and other similar investigations by Supervisory Authorities & management of AML/CFT Transactions Monitoring System (Mantas) at Group

CUSTOMER ASSET INVESTIGATION UNIT

Investigating the existence of customer deposit accounts, debts and other assets kept with the Bank (safe deposit boxes, shares, bonds etc.) following lawful request by customer, Supervisory, Public or Judicial Authority

financing of terrorism (ML/FT), since such criminal acts are contrary to the core values and principles governing business activity. In this light, in 2011 priority was placed on deploying policies and procedures that ensure the maximum level of compliance with the current regulatory framework and prevent the use of the Group's products and services for ML/FT purposes.

Issues regarding consumer protection were an area of special interest, reflecting the Bank's heightened customer focus, particularly during the current adverse economic climate. GRC participated actively in the design and launch of new Bank products, but also in the approval process for the advertising and promotion of these products among the public so as to ensure full compliance with national and European legislation on consumer protection, data privacy, transaction transparency, rules of conduct vis-a-vis customers and the markets, as well as the internal regulations and voluntary codes observed by the Bank.

With a view to enhancing the Group regulatory compliance function, GRC provided the Group's units with guidelines regarding the development and implementation of compliance policies (Policy for avoiding conflicts of interest for senior executives, Remuneration Policy), as well as compliance with the Payment Services Directive (PSD).

Within the context of ongoing measures to enhance the System of Internal Controls (SIC) in the Group's companies, and to facilitate the work and collaboration of the GRC, Internal Audit/Inspection and Risk Management, which together form the key SIC pillars, the Bank appointed Joint Correspondents—Liaisons for SIC issues in each Bank unit.

In addition, GRC continued to run training seminars both in the classroom and via its e-learning platform. Emphasis was placed on AML/CFT issues, and on accreditation of personnel who provide investment services within the institutional framework of the Capital Market. A total of 3,225 staff (from Management, the branch network and other Group companies) participated in these seminars.

Furthermore, RC officers from the Bank and the Group's domestic companies took part in the Certification Course run by the Hellenic Banking Institute of the Hellenic Bank Association on "Regulatory compliance at banks". On completing the course the trainees who pass the exam are awarded the relevant certification.

In seeking to establish an effective environment for monitoring regulatory compliance issues, distance and on-site audits at branches continued, focusing on compliance with AML provisions and due implementation of legislation regarding investment services (MiFID).

Furthermore, in order to deal in a timely manner with failures identified by the reviews carried out in the Bank and the Group by central supervisory authorities or external auditors, GRC systematically monitors, via the Enterprise Governance Risk and Compliance Information System (EGRC), implementation of the corrective measures stated in the audit reports by the Group units.

GRC updates the Audit Committee of the Board of the Bank on a quarterly basis on issues lying within its sphere of competence, focusing on compliance risks revealed by the reviews of supervisory authorities, internal and external audits carried out in the Bank and the Group companies, and the success of the corrective measures implemented. In 2011, the supervisory authorities did not impose any significant fines on the Group.

The implementation of an effective RC framework at Group level played a significant role in ensuring the smooth and efficient running of the Group's operations throughout the year under review.

#### 5.3 INTERNAL AUDIT

The Group Internal Audit-Inspection Division is an independent unit whose main goal is to provide objective views on the efficacy of the System of Internal Controls to the Bank's Board and the Management. To this end, Group Audit-Inspection:

- Conducts controls with regard to the implementation of policies, regulations and procedures at Group Level, mainly covering high risk areas through a risk based approach.
- Directly conducts internal controls with regard to the activities of several domestic subsidiaries.
- Provides guidance, supervises and assists all the Internal Control Units of subsidiaries to ensure the effectiveness of their work.

Because of the financial crisis in Greece and other countries where the Group is active, the Bank remains on high alert and the Unit's control and advisory activities have been adjusted so as to enable the Unit to contribute, within its jurisdiction, to the attainment of Management's strategic goal to confront effectively the fallout from the crisis.

In 2011, besides conducting a considerable number of unscheduled audits that needed to be performed on an exceptional basis, all scheduled audits were duly carried out.

#### Specifically, in 2011:

- Significant resources were channelled to audits conducted in Ethniki Insurance, which generated substantial findings.
- The special anti-fraud (ASIST) application designed to avert and detect possible cases of fraud was utilised and further developed, using our own resources; the application yielded impressive results in reducing potential losses due to fraud as a result of early detection and the deployment of appropriate measures.
- The Group's Audit Guidelines and Policies were updated in line with the latest developments, in accordance with IIA Standards.
- The task of converging Internal Audit and Operating Risk Management methodologies was completed, thereby creating a uniform system for identifying risks.
- Audit methods and procedures applied in domestic branches were redesigned, thereby attaining reductions in audit times without sacrificing quality.
- A large team of Unit staff participated in the extremely important task of rating the fullness of credit files, which was completed in a highly satisfactory manner.
- The forging of synergies with the external auditor—mainly on matters relating to the efficacy of provision formation processes—continued to deepen.

#### 5.4 CORPORATE GOVERNANCE

The Bank operates within a framework of corporate governance that meets not only the requirements of Greek law but also international best practices.

As part of its agenda and in compliance with the provisions of law 3873/2010, the Board approved the amendment of the Corporate Governance Guidelines, which were renamed NBG Corporate Governance Code. The NBG Corporate Governance Code, which can be viewed on the Bank's website, sets out in detail NBG's corporate governance structure and policy, fosters continuity, consistency and efficiency in the modus operandi of the Board of Directors, and generally the governance of the Bank and its Group. In 2011, the Board applied the principles of the Corporate Governance Code virtually in their entirety.

In 2011, the Board decided to enhance the top ranks of the Bank's management pyramid, it was updated by an external advisor on matters regarding banking corporate governance, and it amended the regulations of the Board committees in order to bring them into line with recent changes in the system of governance. From December 2011 through January 2012, the Board evaluated its effectiveness in depth with the assistance of an external advisor.

#### **NBG** Board committees

The Bank has set up five committees that operate at Board level: the Audit Committee, the Human Resources & Remuneration Committee, the Corporate Governance & Nominations Committee, the Risk Management Committee, and the Strategy Committee. The current composition of the Committees is presenting in the Table of the following page.

#### Audit Committee

A brief report on the activities of the Audit Committee is included in the section with the financial statements of the Bank ("Audit Committee Report to Shareholders").

In 2011, the Audit Committee convened ten times. The Committee comprised the following members: Petros Sabatacakis (Chairman and advisor on issues related to the US Securities and Exchange Commission), Alexandra Papalexopoulou-Benopoulou (Vice-Chairman), and Stefanos Vavalidis, Vassilios Konstantakopoulos and George Zanias (members). At its meeting of 23 March 2011, the Board appointed Marily Frangista to the Audit Committee in replacement

SECTION

of Vassilios Konstantakopoulos, who passed away in January. The AGM held on 23 June 2011 elected to the Audit Committee NBG Board members Petros Sabatacakis, Alexandra Papalexopoulou-Benopoulou, Marily Frangista, Stefanos Vavalidis and George Zanias.

		Audit Commit <b>tee</b>	Human Resources & Remuneration Committee	Corporate Governance & Nominations Committee	Risk Management Committee	Strategy Committee
Non-executive member	Vassilios Rapanos		Member	Chairman	Member	Chairman
Executive members	Apostolos Tamvakakis Anthimos Thomopoulos				Member Member	Member
Non-executive members	loannis Giannidis			Member		
Independent Non-executive members	H.E. Metropolitan of Ioannina, Theoklitos Stefanos Vavalidis Alexandros Makridis George Zanias* Alexandra Papalexopoulou	Member Member Member	Member	Member Member Member	Chairman	Member
	-Benopoulou Petros Sabatacakis Marily Frangista Spyros Theodoropoulos	Vice Chairman Chairman Member	Chairman Member	Member	Member	Member Member Member

<sup>\*</sup> resigned in May 2012

#### Risk Management Committee

In 2011, the RMC placed special emphasis on the monitoring and analysis of risks undertaken, and further developed and enhanced the Group's risk management policies. Guided by the Chief Risk Officer, the Committee dealt with an in-depth review and analysis of the Group's loan books, and the formulation of action plans for products whose performance has been impacted by the economic crisis.

The RMC monitored the quality of the loan books of the Bank and its Group companies in SE Europe and Turkey by means of monthly reports, while also monitoring developments in market risk, liquidity ratios, capital adequacy ratios, and the Internal Capital Adequacy Assessment Process (ICAAP). It was also responsible for providing guidance to the various risk management units of the Group.

In the face of the banking crisis that has emerged as a result of global recession and the acute fiscal problem in Greece, the RMC discussed the evolving environment, approved action plans in crucial fields such as the Group's liquidity management, and ways to deal with the deterioration of the loan books.

The Committee discussed and approved adjustments to credit line frameworks and powers of approval, so as to enable the Group to adapt swiftly and effectively to market conditions in the current crisis.

Furthermore, it monitored closely the implementation of Basel II policies, together with adjustments and improvements made by the Group in matters related to Risk Management.

In 2011, the RMC convened eight times. The Committee comprised the following members: Apostolos Tamvakakis (Chairman), Vassilios Rapanos, Stefanos Vavalidis and Petros Sabatacakis (members).

# Corporate Governance & Nominations Committee

In 2011, the CGNC prepared revisions to the Charters of the Board Committees and the Corporate Governance Guidelines, which were duly amended and renamed "NBG Code of Corporate Governance", submitting its recommendations to the Board. The CGNC played a key role in the appointment of new members to the Board's Committees as well as the succession of a non-executive member of the Board and the election of a new director.

In 2011, the CGNC convened four times. The Committee comprised the following members: Vassilios Rapanos

(Chairman), Ioannis Giannidis, George Zanias, H.E. the Metropolitan of Ioannina, Theoklitos and Marily Frangista (members).

#### Human Resources & Remuneration Committee

In 2011, the HRRC reviewed NBG's management structure with a view to strengthening the top ranks of the Bank's management pyramid, while it also prepared amendments to the Committee's Charter. The Committee submitted its recommendations on these matters to the Board for consideration.

In 2011, the HRRC convened four times. The Committee comprised the following members: Vassilios Konstantakopoulos (deceased in January 2011), Alexandra Papalexopoulou-Benopoulou (Chairman), Vassilios Rapanos, H.E. the Metropolitan of Ioannina, Theoklitos and Spyridon Theodoropoulos (members).

#### Strategy Committee

Besides formulating the strategic direction of the Group, the Strategy Committee submitted proposals to the Board on the budget of the Bank and its Group for the financial year 2011. The Committee also reviewed its Charter.

In 2011, the Strategy Committee convened nine times. The Committee comprised the following members: Vassilios Rapanos (Chairman), Apostolos Tamvakakis, Stefanos Vavalidis, Petros Sabatacakis, Alexandra Papalexopoulou-Benopoulou & Spyridon Theodoropoulos (members).

# SECTION 6 GROUP AND BANK FINANCIAL STATEMENTS

### SECTION

ION 6

### Statement of Financial Position

as at 31 December 2011		Group		В	Bank
€ 000's		31.12.2011	31.12.2010	31.12.2011	31.12.2010
ASSETS					
Cash and balances with cent	tral banks	4,082,153	7,530,483	1,566,583	5,069,505
Due from banks		4,635,846	3,321,454	8,026,009	7,091,089
Financial assets at fair value	e through profit or loss	2,682,655	1,723,112	2,457,257	1,082,292
Derivative financial instrume	ents	3,748,757	1,731,192	2,923,318	1,542,961
Loans and advances to custo	omers	71,496,221	77,261,870	52,891,237	58,242,991
Investment securities		10,688,441	20,367,387	7,163,770	12,044,649
Investment property		274,470	213,180	-	-
Investments in subsidiaries		-	-	8,460,927	8,415,877
Investments in associates		42,484	39,246	5,803	7,298
Goodwill, software and other	r intangible assets	2,136,821	2,560,197	128,953	140,807
Property and equipment	3	2,022,676	2,070,446	353,093	388,104
Deferred tax assets		1,309,609	470,701	1,000,326	366,168
Insurance related assets and	d receivables	700,638	822,066	_	_
Current income tax advance		242,359	136,667	242,359	136,667
Other assets		2,786,346	2,474,719	2,067,402	1,755,936
Non-current assets held for	sale	20,513	21,885	20,513	20,513
Total assets		106,869,989	120,744,605	87,307,550	96,304,857
LIABILITIES					
Due to banks		34,108,238	29,898,696	33,870,863	28,869,460
Derivative financial instrume	ents	4,469,460	1,790,556	3,940,485	1,404,051
Due to customers		59,543,640	68,039,037	44,025,167	52,471,008
Debt securities in issue		1,727,864	2,370,303	1,059,297	2,103,771
Other borrowed funds		1,712,074	2,061,773	984,671	1,078,098
Insurance related reserves a	and liabilities	2,685,450	2,834,752	-	-
Deferred tax liabilities		62,674	119,016	-	-
Retirement benefit obligation	ns	275,936	152,012	208,891	79,887
Current income tax liabilities	5	52,040	76,091	-	21,925
Other liabilities		2,485,630	2,497,016	4,283,692	1,496,537
Total liabilities		107,123,006	109,839,252	88,373,066	87,524,737
SHAREHOLDERS' EQUITY					
Share capital		6,137,952	5,137,952	6,137,952	5,137,952
Share premium account		3,326,063	3,327,740	3,324,623	3,326,321
Less: treasury shares		(110)	(4,901)	5,524,025	3,320,321
Reserves and retained earni	inac	(10,187,022)	1,194,109	(10,528,091)	- 315,847
Equity attributable to NBG sl	_	(723,117)	9,654,900	(1,065,516)	8,780,120
Equity attributable to NDO Si	ilai eliotuei 5	(723,117)	3,034,300	(1,005,510)	0,700,120
Non-controlling interests		83,641	834,693	-	-
Preferred securities		386,459	415,760	-	-
Total equity		(253,017)	10,905,353	(1,065,516)	8,780,120
Total equity and liabilities		106,869,989	120,744,605	87,307,550	96,304,857
	Ather	ns, 20 April 2012			
THE CHAIDMAN	THE CHIEF	THE DEPL	ITV CHIEE	THE CH	IFF
THE CHAIRMAN	EXECUTIVE OFFICER		E OFFICER	FINANCIAL (	
/ASSILIOS T. RAPANOS	APOSTOLOS S. TAMVAKAKIS	ANTHIMOS C.	THUMUPOULOS	CHARALAMPOS G	. MAZARAKIS

## Income Statement

for the period ended 31 December 2011					
		roup	Bank		
€ 000's	12 month <b>31.12.2011</b>	period ended 31.12.2010	12 month pe <b>31.12.2011</b>		
£ 000 S	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Interest and similar income	6,586,518	6,402,037	3,765,458	3,508,362	
Interest expense and similar charges	(2,743,710)	(2,254,080)	(1,435,677)	(1,079,585)	
Net interest income	3,842,808	4,147,957	2,329,781	2,428,777	
Fee and commission income	706,628	710,084	235,781	274,348	
Fee and commission expense	(212,779)	(100,159)	(191,654)	(73,381	
Net fee and commission income	493,849	609,925	44,127	200,967	
Earned premia net of reinsurance	789,157	967,007	-		
Net claims incurred	(642,438)	(891,159)	-		
Earned premia net of claims and commissions	146,719	75,848	-	-	
Net trading income / (loss) and results from					
investment securities	(27,719)	(138,308)	(33,073)	(387,382	
Net other income/ (expense)	(83,697)	(55,946)	(33,932)	(130,113	
Total income	4,371,960	4,639,476	2,306,903	2,112,249	
Personnel expenses	(1,616,424)	(1,530,459)	(1,036,593)	(931,800	
General, administrative and other operating expenses	(721,430)	(781,832)	(345,573)	(368,627	
Depreciation and amortisation on investment property, property & equipment and software					
& other intangible assets	(202,869)	(199,818)	(90,427)	(87,277	
Amortisation and write-offs of intangible assets					
recognised on business combinations	(23,362)	(27,442)	-		
Finance charge on put options of non-controlling interests	(6,892)	(13,566)	(6,892)	(13,566	
Credit provisions and other impairment charges	(3,439,026)	(1,450,327)	(3,407,844)	(1,044,586	
Impairment of Greek government bonds	(11,783,256)	-	(10,555,139)		
Share of profit of associates	1,179	1,598	-		
Profit / (loss) before tax	(13,420,120)	637,630	(13,135,565)	(333,607	
Social responsibility tax and non off-settable taxes	-	(79,101)	-	(74,900)	
Tax benefit / (expense)	1,095,236	(118,105)	990,817	47,655	
Profit / (loss) for the period	(12,324,884)	440,424	(12,144,748)	(360,852)	
Attributable to:					
Non-controlling interests	19,148	34,902	-		
NBG equity shareholders	(12,344,032)	405,522	(12,144,748)	(360,852	
Earnings / (losses) per share - Basic and diluted	€(12.93)	€0.46	€(12.70)	€(0.57	
Athens	s, 20 April 2012				
THE CHAIRMAN THE CHIEF EXECUTIVE OFFICER	THE DEPUT		THE CHIEF FINANCIAL OFFICER		
/ASSILIOS T. RAPANOS APOSTOLOS S. TAMVAKAKIS	ANTHIMOS C. TH	JOMODOLII OS	CHARALAMPOS G	MAZADAK	

#### Statement of Comprehensive Income

for the period ended 31 De	cember 2011				
			Froup	Ba	nk
		12 month	n period ended	12 month po	eriod ended
€ 000's		31.12.2011	31.12.2010	31.12.2011	31.12.2010
Profit / (loss) for the period	I	(12,324,884)	440,424	(12,144,748)	(360,852)
Other comprehensive incomprehensive incomprehe	me / (expense):				
Available-for-sale securitie	es, net of tax	1,538,415	(829,467)	1,309,647	(761,734)
Currency translation differen	ences, net of tax	(742,843)	97,434	663	236
Net investment hedge, net	of tax	(9,400)	(164,542)	-	-
Cash flow hedge, net of tax	(	6,064	(10,233)	-	-
Other comprehensive income / (expense) for the period		792,236	(906,808)	1,310,310	(761,498)
Total comprehensive incon	ne / (expense) for the period	(11,532,648)	(466,384)	(10,834,438)	(1,122,350)
Attributable to:					
Non-controlling interests		20,145	41,380	-	-
NBG equity shareholders		(11,552,793)	(507,764)	(10,834,438)	(1,122,350)
	Ather	ns, 20 April 2012			
THE CHAIRMAN	THE CHIEF EXECUTIVE OFFICER	THE DEPUTY CHIEF EXECUTIVE OFFICER		THE CH FINANCIAL	
VASSILIOS T. RAPANOS	APOSTOLOS S. TAMVAKAKIS	ANTHIMOS C.	THOMOPOULOS	CHARALAMPOS (	G. MAZARAKIS

#### Notes to the Financial Statements

#### Segment reporting

NBG Group manages its business through the following business segments:

#### Retail banking

Retail banking includes all individual customers, professionals, small and medium-sized companies (companies with annual turnover of up to €2.5 million). The Bank, through its extended network of branches, offers to its retail customers various types of loan, deposit and investment 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, shipping finance 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.

#### Global markets and asset management

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

#### Insurance

The Group offers a wide range of insurance products through its subsidiary company, Ethniki Hellenic General Insurance Company SA ("EH") and other subsidiaries in SEE and Turkey.

#### International banking operations

The Group's international banking activities, other than its Turkish operations, 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.

#### Turkish banking operations

The Group's banking activities in Turkey through Finansbank and its subsidiaries, include a wide range of traditional commercial banking services, such as commercial and retail credit, trade financing, foreign exchange and taking of deposits.

#### Other

Includes proprietary real estate management, hotel and warehousing business as well as unallocated income and expense of the Group (interest expense of subordinated debt, loans to personnel etc.) and intersegment eliminations.

Breakdown by business seg	ment							
12-month period ended 31 December 2011	Retail Banking	Corporate & Investment Banking	Global markets & Asset Management	Insurance	International Banking Operations	Turkish Banking Operations	Other	Group
Net interest income	1,203,449	775,789	371,353	62,831	387,197	903,357	138,832	3,842,808
Net fee and commission income	101,398	81,691	(106,766)	6,935	94,218	313,622	2,751	493,849
Other	(25,192)	(61,766)	8,674	178,720	5,824	35,646	(106,603)	35,303
Total income	1,279,655	795,714	273,261	248,486	487,239	1,252,625	34,980	4,371,960
Direct costs	(687,823)	(52,153)	(65,095)	(135,460)	(293,350)	(656,414)	(249,029)	(2,139,324)
Allocated costs and provisions	(1,514,674)	(2,151,714)	(10,723,025)	(633,054)	(202,164)	(147,058)	(282,246)	(15,653,935)
Share of profit of associates			(2,592)	1,051	1,193	94	1,433	1,179
Profit / (loss) before tax	(922,842)	(1,408,153)	(10,517,451)	(518,977)	(7,082)	449,247	(494,862)	(13,420,120)
Tax benefit / (expense)								1,095,236
Profit / (loss) for the period								(12,324,884)
Non-controlling interests  Profit attributable to NBG								(19,148)
shareholders								(12,344,032)
Segment assets as at 31.12.2011 Segment assets Deferred tax assets and Current income tax advance	27,368,430	16,195,725	24,903,725	2,041,287	9,856,192	20,671,864	4,280,798	105,318,021 1,551,968
Total assets								106,869,989
Segment liabilities as at 31.12.2011 Segment liabilities Current income and deferred	38,959,017	461,117	35,278,520	2,766,900	7,157,926	16,557,974	5,826,838	107,008,292
tax liabilities								114,714
Total liabilities								107,123,006
Depreciation and amortisation (1) Credit provisions and other impairment charges	18,759 1,180,171	1,688 2,101,421	4,848 10,702,049	8,895 631,329	36,261 200,322	54,593 147,058	101,187 259,932	226,231 15,222,282
Non-current assets additions	5,517	10,805	35,736	3,112	18,872	80,175	66,134	220,351

<sup>(1)</sup> Includes depreciation and amortisation on investment property, property & equipment, software & other intangible assets and amortisation and write-offs of intangible assets recognised on business combinations.

#### SECTION

6

#### Breakdown by location

12-month period ended 31 December 2011	Greece	SE Europe	Turkey	Other	Group
Net interest income	2,549,374	335,684	906,237	51,513	3,842,808
Net fee and commission income	86,182	82,521	313,547	11,599	493,849
Other	(40,833)	1,420	70,264	4,452	35,303
Total income	2,594,723	419,625	1,290,048	67,564	4,371,960
Direct costs	(1,177,457)	(247,434)	(669,521)	(44,912)	(2,139,324)
Allocated costs and provisions	(15,306,555)	(179,171)	(147,058)	(21,151)	(15,653,935)
Share of profit of associates	(108)	1,193	94	-	1,179
Profit / (loss) before tax	(13,889,397)	(5,787)	473,563	1,501	(13,420,120)
Tax expense					1,095,236
Profit / (loss) for the period					(12,324,884)
Non-controlling interest					(19,148)
Profit attributable to NBG shareholders					(12,344,032)
Depreciation and expertination (I)	12F 121	22.0/5	EE 120	2.025	226 221
Depreciation and amortisation (1)	135,131	33,045	55,120	2,935	226,231
Credit provisions and other impairment charges	14,874,902	179,171	147,058	21,151	15,222,282
Non-current asset additions	120,817	16,276	80,662	2,596	220,351
Non-current assets	4,101,153	230,085	284,479	21,783	4,637,500

<sup>(1)</sup> Includes depreciation and amortisation on investment property, property & equipment, software & other intangible assets and amortisation and write-offs of intangible assets recognised on business combinations

Net interest income				
	Group		Ва	ank
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Interest earned on:				
Amounts due from banks	106,604	123,980	163,641	119,040
Financial assets at fair value through profit or loss	121,992	165,387	100,571	135,227
Investment securities	1,059,683	906,593	655,840	506,051
Loans and advances to customers	5,298,239	5,206,077	2,845,406	2,748,044
Interest and similar income	6,586,518	6,402,037	3,765,458	3,508,362
Interest payable on:				
Amounts due to banks	(581,548)	(344,975)	(521,568)	(276,124)
Amounts due to customers	(1,966,603)	(1,559,917)	(773,792)	(689,530)
Debt securities in issue	(119,263)	(83,310)	(87,729)	(66,606)
Other borrowed funds	(76,296)	(265,878)	(52,588)	(47,325)
Interest expense and similar charges	(2,743,710)	(2,254,080)	(1,435,677)	(1,079,585)
Net interest income	3,842,808	4,147,957	2,329,781	2,428,777

Net fee and commission income				
	G	Group		ank
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Custody, brokerage & investment banking	57,008	72,654	12,266	22,655
Retail lending fees	204,925	206,613	30,093	46,257
Corporate lending fees	128,031	140,562	88,672	98,922
Banking fees & similar charges	238,689	205,090	66,622	70,824
Commissions on issues of Hellenic Republic Bank Support Plan				
(Law 3723/2008) Pillar II	(159,109)	(46,012)	(159,109)	(46,012)
Fund management fees	24,305	31,018	5,583	8,321
Net fee and commission income	493,849	609,925	44,127	200,967

Earned premia net of claims and commissions		
	Gro	oup
	31.12.2011	31.12.2010
Gross written premia	889,917	1,078,567
Less: Premia ceded to reinsurers	(79,535)	(119,880)
Net written premia	810,382	958,687
Change in unearned premium reserve	41,559	2,110
Reinsurers' share of change in unearned premium reserve	(14,065)	914
Change in unearned premium reserve – Group share	27,494	3,024
Net earned premia	837,876	961,711
Other (incl. net gains / (losses) on unit-linked assets)	(48,719)	5,296
Earned premia net of reinsurance	789,157	967,007
Benefits and claims incurred	(657,589)	(696,567)
Less: Reinsurers' share of benefits and claims incurred	48,270	71,478
Benefits and claims incurred- Group share	(609,319)	(625,089)
Change in actuarial and other reserves	107,722	(102,879)
Less: Change in reinsurance asset of actuarial and other reserves	28	(3,871)
Change in actuarial and other reserves – Group share	107,750	(106,750)
Commission expense	(110,613)	(134,864)
Commission income from reinsurers	5,926	14,472
Net commission expense	(104,687)	(120,392)
Net return to DAF contract holders	(6,666)	(5,456)
Other	(29,516)	(33,472)
Net claims incurred	(642,438)	(891,159)
Earned premia net of claims and commissions	146,719	75,848

Net trading income / (loss) and results from investment securities						
	Group		Bank			
	31.12.2011	31.12.2010	31.12.2011	31.12.2010		
Net trading result and other net unrealized gains / (losses) from financial instruments	41,753	(135,660)	75,602	(196,209)		
Net gain / (loss) from disposal of investment debt securities	(81,910)	(13,208)	(109,304)	(194,454)		
Net gain / (loss) from disposal of investment equity securities	433	1,310	629	2,240		
Net gain / (loss) from disposal of investment mutual funds	12,005	9,250	-	1,041		
Total	(27,719)	(138,308)	(33,073)	(387,382)		

Personnel expenses					
	G	Group		Bank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Salaries and other staff related benefits	1,398,711	1,459,773	839,984	889,865	
Pension costs: defined benefit plans	217,713	58,380	196,609	31,405	
Share based payment arrangements		12,306	-	10,530	
Total	1,616,424	1,530,459	1,036,593	931,800	

Salaries and other staff related benefits include the amount of €25.5 million (2010: €25.5 million) paid to IKA-ETAM in accordance to Law 3655/2008, after the incorporation of the Bank's main pension fund into the main pension branch of the state sponsored social security fund IKA-ETAM as of 1 August 2008. This amount will be paid to IKA-ETAM for the next 12 years.

The average number of employees employed by the Group during the period to 31 December 2011 was 35,876 (2010: 36,376) and for the Bank was 12,411 (2010: 12,849).

#### SECTION

٧	6

General, administrative & other operating expenses							
	Group		Bank				
	31.12.2011	31.12.2010	31.12.2011	31.12.2010			
Duties and taxes	94,049	98,625	54,574	50,713			
Utilities and rentals	303,372	330,733	191,656	205,367			
Maintenance and other related expenses	33,577	36,085	7,284	8,071			
Other administrative expenses	290,432	316,389	92,059	104,476			
Total	721,430	781,832	345,573	368,627			

Credit provisions and other impairment charges				
	Group		Bank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
a. Impairment charge for credit losses				
Due from banks	96	(19)	-	-
Loans and advances to customers	2,664,491	1,365,030	2,311,879	1,011,501
Other Greek State receivables	39,400	-	39,400	-
	2,703,987	1,365,011	2,351,279	1,011,501
b. Impairment charge for securities				
(excluding the impairment charge due to PSI)				
AFS and loans-and-receivables debt securities (excluding	142,973	(780)	118,101	(780)
the impairment charge due to PSI)				
Equity securities	393,450	75,389	219,771	30,365
	536,423	74,609	337,872	29,585
c. Other provisions and impairment charges				
Impairment of investment property, property and equipment				
and software & other intangible assets	32,234	4,957	14,298	-
Impairment of goodwill / Investment in subsidiaries and associates	120,173	6,320	660,689	-
Legal and other provisions	46,209	(570)	43,706	3,500
	198,616	10,707	718,693	3,500
Total	3,439,026	1,450,327	3,407,844	1,044,586

The following table presents the impairment losses before tax recognized in the income statement for Greek government bonds due to the PSI.

	Group					Bank				
31.12.2011	Nominal amount	Carrying amount before impairment	Impairment losses (before tax)	Of which amounts recycled from OCI	Carrying amount after impairment	Nominal amount	Carrying amount before impairment	Impairment losses (before tax)	Of which amounts recycled from OCI	Carrying amount after impairment
Securities and loans included in loans and advances to customers	1.779.320	1.924.885	1.465.603	_	459.282	1.779.320	1.924.885	1.465.603	-	459.282
Held-to-maturity and loans-and- receivables investment										
securities	12.971.337	12.307.374	10.317.653	1.979.969	3.969.690	9.031.433		7.053.528	1.603.474	2.951.120
Subtotal Provision for the reimbursement of impairment losses due to	14.750.657	14.232.259	11.783.256	1.979.969	4.428.972	10.810.753	10.326.059	8.519.131	1.603.474	3.410.402
PSI to Group entities	;		-					2.036.008		
Total impairment of Greek government			44 1700 050					10 FFF 100		
bonds, before tax			11.783.256					10.555.139		

At the European Summit on 26 October 2011, the Heads of States of the euro area agreed on a comprehensive set of measures, including a voluntary bond exchange with a nominal discount of 50% on notional Greek debt held by private investors. Together with an ambitious reform program for the Greek economy, supporting growth, the PSI is expected to secure the reduction of the Greek debt to GDP ratio to 120% by 2020.

On 24 February 2012, the Hellenic Republic Ministry of Finance (the "MiFin") published the invitation memoranda (the "Memoranda") whereby it invited the holders of the Greek government bonds that were eligible for the PSI (the "eligible GGBs") to offer to exchange their eligible GGBs subject to the terms described in the Memoranda (the "Offer").

The Group participated in the Offer under the terms of the Memoranda. The exchange of the Greek government bonds that were subject to Greek law took place on 12 March 2012, while the exchange of bonds subject to foreign law is expected to take place in April 2012.

The key terms of the Offer are as follows:

- 53.5% haircut on the nominal value of the eligible GGBs
- Receipt of European Financial Stability Facility ("EFSF") bonds with total nominal value 15% of the nominal amount of the exchanged bonds, half of which mature in 12 months and half in 24 months.
- New bonds (the "New GGBs") with the following characteristics:
  - Issuer: Hellenic Republic
  - Nominal value: 31.5% of the nominal amount of the exchanged bonds
  - Payment of principal: 20 separate bonds with staggered bullet maturities of between 11 and 30 years
  - Coupon rate: 2.0% per annum for payment dates in 2013 2015, 3.0% per annum for payment dates in 2016 2020, 3.65% per annum for payment date 2021 and 4.3% per annum for payment dates in 2022 and thereafter.
- Detachable GDP-linked securities issued by the Hellenic Republic (the "GDP-linked Securities") traded in the market with a notional amount equal to the face amount of the New GGBs received. The GDP-linked Securities will provide for annual payments beginning in 2015 of an amount of up to 1% of their notional amount in the event the Hellenic Republic's nominal GDP exceeds a defined threshold and the Hellenic Republic has positive GDP growth in real terms in excess of specified targets.
- Any accrued and unpaid interest (including additional amounts, if any) on the exchanged bonds will be paid with 6-month securities issued by the EFSF.
- The New GGBs and the GDP-linked Securities will be governed by English law and will be ranked pari passu with all other borrowed monies of the Hellenic Republic.

Based on the terms and the conditions in the Memoranda, and due to financial difficulties of the issuer, the Group and the Bank grant a concession to the Hellenic Republic that they would not otherwise consider. Therefore, as at 31 December 2011, there was objective evidence of impairment in relation to the eligible GGBs.

The Offer is considered as adjusting event after the reporting period in relation to the annual financial statements for the year ended 31 December 2011, because it provides evidence of conditions that existed at the end of the reporting period, and therefore, the Group and the Bank recognised an impairment loss in the annual financial statements for the year ended 31 December 2011. The impairment loss comprised of (a) all losses previously recognized in OCI that were recycled in the income statement and (b) impairment charges for instruments classified as held-to-maturity and loans-and-receivables equal to the difference between the carrying amount and the estimated recoverable amount. The recoverable amount was estimated based on the contractual cash flows, a discount rate of 12% and appropriate risk parameters.

The discount rate was based on the new fundamentals regarding the Greek debt (the successful implementation of the PSI together with the financial assistance under the Program agreed by the euro area members and the IMF that will improve Greece's debt sustainability aiming at the reduction of the Greek debt to GDP ratio to 120% by 2020, the new reform effort and the escrow account arranged for the new PSI bonds that raises their seniority). Specifically, to arrive at this estimate, we have considered the yields of similarly rated sovereign and corporate entities, and we have analyzed the relationship of credit ratings and public debt with the bond yields for other European countries.

# ECTION 6

Tax expense					
	(	Group	Bank		
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Non-offsettable taxes in accordance with Law 3842/2010	-	52,975	-	52,975	
Social responsibility tax in accordance with Law 3845/2010	-	26,126	-	21,925	
Social responsibility tax and non off-settable taxes	-	79,101	-	74,900	
Current tax	144,317	179,391	17,490	17,161	
Settlement of "open" tax years	8,223	2,494	-	-	
Tax on the impairment of Greek government bonds	(1,033,010)	-	(787,387)	-	
Deferred tax	(214,766)	(63,780)	(220,920)	(64,816)	
Tax (benefit) / expense	(1,095,236)	118,105	(990,817)	(47,655)	
Total	(1,095,236)	197,206	(990,817)	27,245	

The nominal corporation tax rate for the Bank for 2010 was 24%.

Upon the exchange of the eligible GGBs under the Offer and in accordance with the law 4046/2012 voted specifically for the implementation of the PSI, any difference (loss) arising from the said exchange is considered deductible for tax purposes and is amortised in equal instalments over the duration of the "New GGBs", instead of expensed in the year in which the exchange takes place and be part of the taxable losses of this year which have a 5 year utilization period, irrespective of the fact that they may not be held until maturity. In light of the fact that law 4046/2012 was voted on 14 February 2012, management has judged not to recognize the deferred tax asset of €1,323.6 million on the PSI losses that will be recognized in accordance with tax legislation (i.e. the difference between the tax carrying amount of the eligible GGBs and the nominal amount of bonds received). Management will assess in future periods the recognition of this deferred tax asset to the extent that future taxable profit, as forecasted in the business plan submitted to the Greek banking regulator, will be available to absorb these tax losses.

Furthermore, as at 31 December 2011, the management decided to reverse deferred tax assets on taxable losses of €194,986 and €190,112 for the Group and the Bank respectively, which will expire up to 2015, as assessed that there will not be sufficient taxable income to recover the DTA on tax losses before their expiration.

Earnings / (losses) per share				
		Group	1	Bank
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Profit/(loss) for the period attributable to NBG equity shareholders	(12,344,032)	405,522	(12,144,748)	(360,852)
Less: dividends on preference shares and preferred securities	(17,288)	(92,476)	(700)	(71,558)
Add: gain on redemption of preferred securities, net of tax	12,214	38,423	-	-
Profit/(loss) for the period attributable to NBG ordinary shareholders	(12,349,106)	351,469	(12,145,448)	(432,410)
Weighted average number of ordinary shares outstanding				
for basic and diluted EPS as adjusted	955,341,356	762,275,390	956,090,482	762,801,592
Earnings / (losses) per share - Basic and diluted	€(12.93)	€0.46	€(12.70)	€(0.57)

As at 31 December 2011, all the share option programs had lapsed, therefore no dilutive potential ordinary shares exist, whereas for the 12 month period ended 31 December 2010, the number of potential dilutive ordinary shares was nil due to the fact that for the said period, the exercise price of the share options outstanding was higher than the average market price of the Bank's shares.

Financial assets at fair value through profit or loss				
	Gr	oup	Baı	nk
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Financial assets designated as at fair value through profit or loss	-	37,151	-	-
Trading Securities:				
Government bonds	175,234	146,801	79,231	54,265
Treasury bills	2,292,279	948,114	2,292,279	948,114
Other debt securities	193,218	558,420	85,360	78,052
Equity securities	16,517	16,354	387	1,861
Mutual funds units	5,407	16,272	-	-
Total	2,682,655	1,723,112	2,457,257	1,082,292

At 31 December 2011 trading government bonds for the Group include Greek government bonds of nominal value €10.9 million and carrying amount €2.7 million, while for the Bank the corresponding amounts are €10.1 million and €2.5 million, respectively.

Derivative financial instruments						
		Group	)		Bank	
		31.12.20	011	3		
		Fair	Fair		Fair	Fair
	Notional	value	value	Notional	value	value
	amounts	Assets	Liabilities	amounts	Assets	Liabilities
Derivatives held for trading						
Interest rate derivatives – OTC	49,250,681	2,389,725	3,229,969	44,566,608	2,084,058	2,894,631
Foreign exchange derivatives – OTC	10,262,821	173,723	128,184	4,023,907	67,259	18,767
Other types of derivatives – OTC	316,335	6,640	7,834	305,014	6,186	7,563
Interest rate derivatives – Exchange traded	1,762,832	5,703	7,559	1,731,773	5,703	7,494
Foreign exchange derivatives – Exchange traded	42,025	2,760	806	-	-	-
Other types of derivatives - Exchange traded	404	79	6	-	-	-
Total	61,635,098	2,578,630	3,374,358	50,627,302	2,163,206	2,928,455
Derivatives held for fair value hedging						
Interest rate derivatives – OTC	14,960,781	1,170,127	1,081,053	11,981,065	760,112	1,012,030
Total	14,960,781	1,170,127	1,081,053	11,981,065	760,112	1,012,030
Derivatives held for cash flow hedging						
Interest rate derivatives – OTC	217,436	-	14,049	-	-	-
Total	217,436	-	14,049	-	-	-
Total	76,813,315	3,748,757	4,469,460	62,608,367	2,923,318	3,940,485

Loans and advances to customers					
	(	Group	Bank		
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Mortgages	24,078,525	25,565,711	19,895,288	20,796,403	
Consumer loans	8,663,600	8,596,830	5,108,509	5,296,057	
Credit cards	5,360,133	5,394,477	1,550,677	1,808,126	
Small business lending	6,221,236	6,420,508	3,812,211	4,122,619	
Retail lending	44,323,494	45,977,526	30,366,685	32,023,205	
Corporate and public sector lending	34,292,317	34,845,963	28,293,652	28,471,165	
Total before allowance for impairment on loans and advances to					
customers	78,615,811	80,823,489	58,660,337	60,494,370	
Less: Allowance for impairment on loans and advances to customers _	(7,119,590)	(3,561,619)	(5,769,100)	(2,251,379)	
Total	71,496,221	77,261,870	52,891,237	58,242,991	

# Securitisation of loans and Covered Bonds

Loans and advances to customers include securitised loans and loans used as collateral in the covered bonds program, as follows:

Securitised Loans				
	(	Group	Bank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Consumer loans (Revolver 2008 – 1 Plc – December 2008)	1,035,809	1,161,510	1,035,809	1,161,510
Credit cards (Revolver 2008 – 1 Plc – December 2008)	1,065,395	1,244,399	1,065,395	1,244,399
Receivables from Public sector (Titlos Plc – February 2009)	5,703,468	5,718,671	5,703,468	5,718,671
Mortgages (Spiti Plc - September 2011)	1,691,446	-	1,691,446	-
Auto loans (Autokinito Plc - September 2011)	432,011	-	432,011	-
Consumer loans (Agorazo Plc – September 2011)	1,500,774	-	1,500,774	_
Total securitized loans	11,428,903	8,124,580	11,428,903	8,124,580

Investment securities				
		Group	В	Bank
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Available-for-sale investment securities:				
Debt securities				
Greek government bonds	-	1,215,631	-	1,215,631
Treasury bills and other eligible bills	194,837	218,728	20,197	18,522
Debt securities issued by other governments and public sector entities	3,040,968	3,748,741	114,352	244,921
Corporate bonds incorporated in Greece	107,043	208,656	90,766	167,987
Corporate bonds incorporated outside Greece	27,541	134,878	7,894	22,298
Debt securities issued by Greek financial institutions	157,756	546,063	89,556	216,478
Debt securities issued by foreign financial institutions	364,147	970,241	575,229	781,844
Total debt securities	3,892,292	7,042,938	897,994	2,667,681
Equity securities	194,776	382,069	78,484	160,037
Mutual funds units	422,162	499,347	180,996	207,494
Total available-for-sale investment securities	4,509,230	7,924,354	1,157,474	3,035,212
Held-to-maturity investment securities:				
Greek government bonds	866,364	3,501,126	324,042	1,185,929
Treasury bills and other eligible bills	56,096	14,471	-	-
Debt securities issued by other government and				
public sector entities	101,206	105,671	42,072	45,637
Debt securities issued by foreign financial institutions	-	5,016	-	-
Debt securities issued by companies of the Group	-	-	956,116	742,968
Total held-to-maturity investment securities	1,023,666	3,626,284	1,322,230	1,974,534
Loans and receivables investment securities:				
Greek government bonds	4,520,326	8,064,404	4,044,077	6,319,080
Debt securities issued by other government and				
public sector entities	5,857	16,585	5,857	16,585
Corporate bonds incorporated outside Greece	13,221	13,249	-	-
Debt securities issued by Greek financial institutions	365,724	444,918	346,835	426,266
Debt securities issued by foreign financial institutions	250,417	277,593	240,926	268,121
Debt securities issued by companies of the Group			46,371	4,851
Total loans and receivable securities	5,155,545	8,816,749	4,684,066	7,034,903
Total investment securities	10,688,441	20,367,387	7,163,770	12,044,649

At 31 December 2011 Greek government bonds held by the Group and the Bank that were not eligible for exchange comprised of:

- a) a bond in the loans-and-receivables investment securities with nominal amount €1,434.7 million and carrying value €1,350.1 million that matures in May 2014 and was received by the Bank in settlement of the Redeemable Preference Shares issued to the Greek State in accordance with the Law 3723/2008 (Pillar I),
- b) a bond in the held-to-maturity investment securities issued by the New Economy Development Fund ("TANEO"), a company controlled by the Hellenic Republic, with nominal amount €57.7 million and carrying value €56.0 million that matures in June 2013, and
- c) a bond in the loans-and-receivables investment securities with nominal amount €12.1 million and carrying value €10.9 million that matures in August 2014.

The Group has concluded that there is no objective evidence of impairment with respect to these bonds, because there is no evidence at the date these financial statements were authorized that there is a loss event that has an impact on the estimated future cash flows associated with these bonds, hence that the future cash flows will not be recovered in accordance with the contractual terms.

To arrive at this conclusion the Group has considered that, although the issuer has financial difficulties, there is no indication of a concession being granted with respect to the Greek government bonds that are not eligible for the PSI and there were no concessions being discussed in relation to these bonds. The official sector (defined as the Heads of State of the Eurozone, the IMF, the ECB, the EU and the Hellenic Republic) had the opportunity to include these bonds in the PSI and decided not to. Furthermore, in reaching that conclusion it was also taken into consideration that all three bonds mature by 2014, that is within the period of the new Program for economic support for Greece, and that the euro area countries and the IMF had offered continuous support to Greece.

In particular for the bond received in settlement of the Redeemable Preference Shares issued to the Greek State (see (a) above), the Bank also considered that this transaction formed an integral part of the public policy of the Official Sector to support the regulatory capital of the Greek banks in an effort to sustain the systemic stability of the financial sector in Greece. The Hellenic Republic would not benefit from defaulting on this bond since such action would not result to any reduction of the public debt, merely would be more than offset by the increased capitalization needs of the Greek banks and would therefore increase the Greek public debt. This result would have been in clear contradiction to the basic aim of the new Program for economic support for Greece, which was approved by the Heads of State of the Eurozone states and is supervised by the IMF, the ECB and the EU. Additionally, subject to obtaining Bank of Greece and other statutory approvals for the repurchase of the Redeemable Preference shares of a nominal value of €1,350.0 million, the Bank could elect to exchange this bond at its maturity in May 2014 with the Redeemable Preference shares.

For the bond issued by TANEO (see (b) above), the Bank also considered that the fair value of the company's investments and the cash and cash equivalents held by TANEO exceeds the total outstanding bond issue and therefore the probability of TANEO defaulting on the bonds it has issued is very small.

Finally, it is expected that the successful implementation of the PSI together with the financial assistance under the Program agreed by the Eurozone members and the IMF will improve Greece's debt sustainability aiming at the reduction of the Greek debt to GDP ratio to 120% by 2020. This conclusion is also supported by the statements issued by the Euro summit and the EU Heads of State or Government on 26 October 2011, the Eurogroup statement on 21 February 2012, the press release of the Institute of International Finance (the "IIF") on 3 March 2012 and the statement by the IMF managing director on 9 March 2012.

Investment property	Group					
	Land	Buildings	Total			
Cost		-				
At 1 January 2011	88,707	186,290	274,997			
Foreign exchange differences	-	(2,464)	(2,464)			
Transfers	(4,652)	(17,145)	(21,797)			
Additions	1,770	86,163	87,933			
Disposals and write offs	-	(310)	(310)			
At 31 December 2011	85,825	252,534	338,359			
Accumulated depreciation & impairment						
At 1 January 2011	(871)	(60,946)	(61,817)			
Foreign exchange differences	-	1,602	1,602			
Transfers	-	5,858	5,858			
Disposals and write offs	-	295	295			
Depreciation charge	-	(4,634)	(4,634)			
Impairment charge	-	(5,193)	(5,193)			
At 31 December 2011	(871)	(63,018)	(63,889)			
Net book amount at 31 December 2011	84,954	189,516	274,470			

Investments in associates				
		Group	Ва	ank
	2011	2010	2011	2010
At 1 January	39,246	42,680	7,298	27,631
Additions/ transfers	5,245	20,067	723	180
Disposals/ transfers	(401)	(23,558)	-	(20,513)
Share of profits of associates	1,179	1,598	-	-
Dividends	(2,785)	(1,541)	-	-
Impairment charge	-	-	(2,218)	-
At 31 December	42,484	39,246	5,803	7,298

In 2010 disposals/transfers include Larco SA and Europa Insurance Co SA that have been reclassified to Non-current assets held for sale. Additions mainly relate to investments made by our private equity funds.



Goodwill, software and other intangibles assets  Group  Bank								Bank	
			Other	Other					
	Goodwill	Software	finite life intangibles	indefinite life intangibles	Other intangibles	Total	Software	Other intangibles	Total
Cost			<u> </u>		J				
At 1 January 2011	2,110,920	436,539	191,940	154,741	119,597	3,013,737	243,356	145,745	389,101
Foreign exchange									
differences	(261,290)	(17,376)	(25,418)	(22,118)	403	(325,799)	50	187	237
Transfers	-	89	-	-	(489)	(400)	(329)	-	(329)
Additions	30,847	64,540	-	-	12,534	107,921	27,539	12,195	39,734
Disposals and write offs	(17,753)	(248)	-	-	(722)	(18,723)	(209)	(412)	(621)
At 31 December 2011	1,862,724	483,544	166,522	132,623	131,323	2,776,736	270,407	157,715	428,122
Accumulated amortisation &									
impairment									
At 1 January 2011	(11,396)	(293,697)	(106,954)	_	(41,493)	(453,540)	(182,770)	(65,524)	(248,294)
Foreign exchange difference	es (89)	10,538	15,857	-	1	26,307	(39)	(163)	(202)
Transfers	-	177	-	-	-	177	234	-	234
Disposals and write offs	7,493	249	-	-	-	7,742	209	-	209
Amortisation charge	-	(56,002)	(22,349)	-	(10,450)	(88,801)	(27,779)	(12,723)	(40,502)
Impairment charge	(120,173)	-	(1,013)	-	(10,614)	(131,800)	-	(10,614)	(10,614)
At 31 December 2011	(124,165)	(338,735)	(114,459)	-	(62,556)	(639,915)	(210,145)	(89,024)	(299,169)
Net book amount at									
31 December 2011	1,738,559	144,809	52,063	132,623	68,767	2,136,821	60,262	68,691	128,953

The additions, as well as the disposals and write-offs in goodwill relate to investment activities of the Group from the private equity business. The CGUs where significant goodwill is allocated are the Turkish and Serbian operations and the goodwill relates to the acquisitions of Finansbank and Vojvodjanska Banka.

The goodwill relating to the acquisition of Vojvodjanska Banka and allocated to the Serbian operations CGU, included in the International banking operations segment, is impaired and an impairment charge of €100 million was recognized in the current year's income statement in respect of that segment. The impairment is mainly attributed to the deterioration of the economic conditions in Serbia. The fair value of the Serbian operations CGU was assessed based on an 8.0% (2010: 8.0%) terminal growth rate and 13.3% (2010: 13.7%) pre tax discount rate.

Following this impairment, the goodwill in respect of these acquisitions amounts to €1,467.2 million (2010: €1,732.2 million) and €110.1 million (2010: €208.3 million) respectively. The variance is mainly due to the effect of foreign exchange rate differences and the impairment charge recognised in the current year's income statement relating to the acquisition of Vojvodjanska Banka. Additionally the Group fully impaired the goodwill relating to the acquisition of National Securities SA of €13.4 million and the goodwill relating to the acquisition of NBG Leasing IFN SA of €6.7 million.

Other indefinite life intangibles include the brand names of Finansbank and Vojvodjanska Banka of €122.9 million and €9.7 million respectively (2010: €145.1 million and €9.6 million respectively). The differences are due to foreign exchange rates fluctuations. Other finite life intangibles include net core deposits and customer relationships amounting to €40.5 million relating to the acquisition of Finansbank (remaining useful lives span from 1.5 to 2.5 years) and €11.6 million relating to the acquisition of Vojvodjanska Banka (remaining useful lives span from 5 to 6 years), (2010: €70.0 million and €13.6 million respectively). An amount of €1.0 million of finite life intangibles relating to the acquisition of National Securities SA was fully impaired in 2011 (at 31 December 2010 the net carrying amount of these intangibles was €1.3 million).

Property and equipment						
Group	Land	Buildings	Vehicles & equipment	Leasehold improvements	Assets under construction	Total
Cost						
At 1 January 2011	925,678	1,075,839	1,010,221	239,922	23,821	3,275,481
Foreign exchange differences	(17)	(11,103)	(40,143)	(18,719)	27	(69,955)
Transfers	4,453	19,462	10,356	7,201	(21,255)	20,217
Additions	618	14,113	94,301	15,803	9,394	134,229
Disposals and write offs	(5,178)	(13,992)	(18,456)	(8,297)	(1,062)	(46,985)
At 31 December 2011	925,554	1,084,319	1,056,279	235,910	10,925	3,312,987

Group	Land	Buildings	Vehicles & equipment	Leasehold improvements	Assets under construction	Total
Accumulated depreciation and impairment						
At 1 January 2011	(3,453)	(369,360)	(707,099)	(125,123)	_	(1,205,035)
Foreign exchange differences	-	1,715	30,711	11,079	-	43,505
Transfers	-	(4,616)	1,185	160	-	(3,271)
Disposals and write offs	-	6,797	9,954	5,949	-	22,700
Depreciation charge	-	(21,016)	(87,110)	(23,657)	-	(131,783)
Impairment charge	(15,368)	(853)	_	(206)	-	(16,427)
At 31 December 2011	(18,821)	(387,333)	(752,359)	(131,798)	-	(1,290,311)
Net book amount at 31 December 2011	906,733	696,986	303,920	104,112	10,925	2,022,676

Deferred tax assets and liabilities					
	0	roup	Bank		
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Deferred tax assets:					
Securities	649,541	300,785	380,427	245,341	
Derivatives	298,528	37,220	298,528	37,220	
Property and equipment and intangible assets	(6,189)	(4,941)	(3,888)	(7,276)	
Pension and other post retirement benefits	59,071	22,953	55,681	19,470	
Insurance reserves	12,293	15,832	-	-	
Loans and advances to customers	246,693	(220,417)	244,530	(228,531)	
Tax losses	15,475	284,155	-	273,172	
Other temporary differences	34,197	35,114	25,048	26,772	
Deferred tax assets	1,309,609	470,701	1,000,326	366,168	
Deferred tax liabilities:					
Securities	(14,999)	1,567	-	-	
Derivatives	31,960	45,025	-	-	
Property and equipment and intangible assets	37,733	51,635	-	-	
Pension and other post retirement benefits	(4,690)	(4,579)	-	-	
Loans and advances to customers	18,027	45,815	-	-	
Tax losses	-	(5,329)	-	-	
Other temporary differences	(5,357)	(15,118)			
Deferred tax liabilities	62,674	119,016	-	-	

Deferred tax charge in the income statement				
	Gı	roup	В	ank
Securities	721,217	(88,627)	509,051	(100,069)
Derivatives	267,800	75,448	261,308	118,717
Property and equipment and intangible assets	5,954	145	3,343	(4,541)
Pension and other post retirement benefits	36,869	3,025	36,211	3,300
Insurance reserves	(3,539)	2,677	-	-
Loans and advances to customers	489,866	(37,076)	473,059	(77,659)
Tax losses	(273,458)	141,842	(273,172)	144,086
Other temporary differences	3,067	(33,654)	(1,493)	(19,018)
Deferred tax charge in the income statement	1,247,776	63,780	1,008,307	64,816
Deferred tax through OCI	(365,934)	230,563	(373,970)	190,135
Deferred tax through equity	13,408	20,460	(179)	29,123
Net deferred tax movement	895,250	314,803	634,158	284,074



The Group and the Bank believe that the realization of the recognized net Deferred Tax Assets ("DTA") of € 1,309.6 million and €1,000.3 million respectively, at 31 December 2011, is more probable than not based upon expectations of future taxable income in Greece. Additional evidence is provided by the Business plan submitted to the Bank of Greece. This Business plan provide sufficient positive evidence that the Bank will be able to recover these deferred tax assets, as has been estimated that it is probable the future taxable income will be sufficient to utilize the deductible temporary differences. Additionally, the Bank intends to implement tax planning strategies in order to support the realization of all or part of these deferred tax assets.

At 31 December 2011, cumulative tax losses amounted to  $\le$ 1,102.1 million, of which  $\le$ 950.5 million relates to the Bank and incurred in 2008, 2009 and 2010. The Bank has concluded that in the next years its tax loss position will be burden by the amortization of the PSI for tax purposes and therefore there will not be sufficient taxable income to recover the DTA on tax losses before they expire; and in this respect the Group and the Bank reversed the corresponding deferred tax asset of  $\le$ 194,986 and  $\le$ 190,112 respectively.

Other assets				
	Group		Bank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Accrued interest and commissions	750,062	785,209	636,613	654,251
Receivables from Greek state	361,204	204,282	351,323	204,282
Tax prepayments and other recoverable taxes	43,756	53,570	5,682	11,390
Private equity: investees assets	127,150	87,289	-	-
Trade receivables	96,931	106,103	16,228	29,896
Assets acquired through foreclosure proceedings	203,533	194,659	80,592	80,527
Prepaid expenses	155,416	147,251	45,185	61,414
Hellenic Deposit and Investment Guarantee Fund	288,090	227,078	288,090	227,078
Checks and credit card transactions under settlement	176,312	221,922	138,290	169,751
Securities transactions under settlement	9,177	16,082	4,925	5,853
Other	574,715	431,274	500,474	311,494
Total	2,786,346	2,474,719	2,067,402	1,755,936

Due to banks				
		Group	Bank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Demand deposits due to credit institutions	186,710	286,680	177,937	258,652
Time deposits due to credit institutions	573,076	788,506	780,525	1,385,945
Interbank deposits	217,807	502,302	435,334	417,380
Amounts due to ECB and Central Banks	31,281,024	24,406,207	31,215,751	24,204,695
Securities sold under agreements to repurchase	1,333,572	3,503,807	748,896	2,195,220
Other	516,049	411,194	512,420	407,568
Total	34,108,238	29,898,696	33,870,863	28,869,460

G	roup	В	Bank	
31.12.2011	31.12.2010	31.12.2011	31.12.2010	
47,716,946	52,765,286	35,771,831	42,429,036	
8,846,615	11,148,001	5,450,875	6,270,173	
2,168,510	3,531,904	2,096,214	3,345,233	
58,732,071	67,445,191	43,318,920	52,044,442	
25,530	28,663	5,970	51,887	
786,039	565,183	700,277	374,679	
59,543,640	68,039,037	44,025,167	52,471,008	
	31.12.2011 47,716,946 8,846,615 2,168,510 58,732,071 25,530 786,039	47,716,946       52,765,286         8,846,615       11,148,001         2,168,510       3,531,904         58,732,071       67,445,191         25,530       28,663         786,039       565,183	31.12.2011         31.12.2010         31.12.2011           47.716.946         52.765,286         35,771,831           8.846.615         11,148,001         5,450,875           2.168.510         3,531,904         2,096,214           58,732,071         67,445,191         43,318,920           25,530         28,663         5,970           786,039         565,183         700,277	

	Group		Bank	
Deposits:				
Savings accounts	19,297,547	23,294,050	18,254,947	22,302,371
Time deposits	32,768,315	37,844,827	19,987,341	24,972,103
Current accounts	2,413,200	2,463,463	1,435,641	1,453,619
Sight deposits	3,841,770	3,449,706	3,241,537	2,928,667
Other deposits	411,239	393,145	399,454	387,682
	58,732,071	67,445,191	43,318,920	52,044,442
Securities sold to customers under agreements to repurchase	25,530	28,663	5,970	51,887
Other	786,039	565,183	700,277	374,679
	811,569	593,846	706,247	426,566
Total	59,543,640	68,039,037	44,025,167	52,471,008

Debt securities in issue						
		Group			Bank	
	Interest			Interest		
	rate	31.12.2011	31.12.2010	rate	31.12.2011	31.12.2010
Corporate bonds - fixed rate	6.5%	55,372	98,613	-	-	-
Corporate bonds - floating rate	2.1%	19,134	97,311	-	-	-
Covered bonds - fixed rate	3.9%	1,059,297	1,160,656	3.9%	1,059,297	1,160,656
Covered bonds - floating rate	-	-	98,006	-	-	98,006
Fixed rate notes	6.0%	594,061	70,608	-	-	-
		1,727,864	1,525,194		1,059,297	1,258,662
Issues under the Hellenic Republic						
Bank Support Plan						
Floating rate notes	-	-	845,109	-	-	845,109
Total		1,727,864	2,370,303		1,059,297	2,103,771

Other borrowed funds				
	0	Group		ank
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Subordinated notes - fixed rate	443,293	563,473	549,264	647,202
Subordinated notes - floating rate	-	-	354,779	350,409
Loans-fixed rate	593,266	716,040	80,628	80,487
Loans-floating rate	675,515	782,260	-	
Total	1,712,074	2,061,773	984,671	1,078,098

Included in the Bank's fixed and floating rate subordinated notes are the amounts ultimately lent to the Bank under loan agreements with NBG Finance Plc, NBG Finance (Dollar) Plc and NBG Finance (Sterling) Plc, representing the proceeds of the securities issued by NBG Funding Ltd.

Additionally, fixed rate borrowings primarily of Finansbank, Finans Leasing and Finans Factoring, amounting to €555,961 (of which €138,625, €73,334 and €344,002 denominated in EUR, TL and USD respectively) and floating rate borrowings of the above mentioned companies, amounting to €106,342 (of which €92,815, €2,458 and €11,069 denominated in EUR, TL and USD).

# SECTION

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Other liabilities

Insurance related reserves and liabilities		
	Gro	up
Insurance reserves	31.12.2011	31.12.2010
Life		
Mathematical and premium reserves	1,164,595	1,252,042
Outstanding claims reserve	92,198	73,490
Other	20,690	13,651
Total	1,277,483	1,339,183
Insurance provisions for policies where the holders bear the investment risk (Unit linked)	295,712	353,534
Guaranteed benefit reserve for unit-linked contracts	50,794	23,338
Total Life reserves	1,623,989	1,716,055
Property and Casualty		
Unearned premia reserve	158,971	204,650
Outstanding claims reserve	613,276	576,264
Other	10,836	19,187
Total Property and Casualty reserves	783,083	800,101
Other Insurance liabilities		
Liabilities relating to deposit administration funds (DAF)	198,040	232,337
Amounts payable to brokers, agents and sales partners	56,518	62,868
Amounts payable to reinsurers	23,820	23,391
Total	2,685,450	2,834,752

#### Bank Group 31.12.2011 31.12.2010 31.12.2011 31.12.2010 Accrued interest and commissions 384,169 456,336 460,565 379,160 Creditors and suppliers 216,992 314,600 159,376 279,461 Amounts due to government agencies 180,043 145,425 171,352 134,382 Private equity: liabilities of investee entities 208,064 134,028 44.579 Other provisions 140.265 112.148 87.630 95,022 90,229 23,906 24,922 Taxes payable - other than income taxes Accrued expenses and deferred income 102,720 169,530 67,887 97,780 Payroll related accruals 58.141 51.610 18.372 16.312 4,080 30,923 4,073 30,916 Dividends payable Puttable instruments held by non-controlling shareholders 283,185 265,705 283,185 265,705 Unsettled transactions on debt securities 2,727 1,065 2,727 1,065 Checks and credit card transactions under settlement 439,178 420,715 Short position on financial instruments at fair value through profit or loss 5,009 15,681 764,127 Provision for the reimbursement of impairment losses due to PSI to Group entities 2.036.008

293,868

2,485,630

361,188

2,497,016

204,484

4,283,692

222,255

1,496,537

Other

Total

Contingent liabilities and commitments					
		Group	В	ank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Commitments to extend credit*	14,679,117	18,208,882	6,903,689	10,757,701	
Standby letters of credit and financial guarantees written	5,970,422	6,684,876	4,010,307	4,528,057	
Commercial letters of credit	589,924	539,790	110,326	136,969	
Total	21,239,463	25,433,548	11,024,322	15,422,727	

<sup>\*</sup> Commitments to extend credit at 31 December 2011 include amounts of €1,686 million for the Group (2010: €1,319 million) and €80 million for the Bank (2010: €238 million), 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. Such commitments are used in the Risk Weighted Assets calculation for capital adequacy purposes under regulatory rules currently in force.

Assets pledged					
		Group		Bank	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Assets pledged as collateral	33.383.491	26.825.899	31.548.398	23.757.003	

As at 31 December 2011, the pledged amounts relate to:

- trading and investment debt securities of €7,349 million pledged mainly for funding purposes with the ECB, the EIB and other central banks, as well as, for the purposes of transactions through TARGET with the BoG and with the derivatives clearing house (ETESEP),
- bonds covered with mortgage loans amounting to €8,800 million, and
- loans and advances to customers amounting to €17,234 million pledged mainly with BoG for funding purposes.

Additionally, the Bank has pledged with the ECB for funding purposes:

- floating Rate notes of €14,798 million, issued under the government-guaranteed borrowing facility provided by Law 3723/2008 (pillar II) and held by the Bank, and
- Greek government bonds of €787 million obtained from Public Debt Management Agency under the provisions of Law 3723/2008 (pillar III), collateralized with shipping and mortgage loans and loans to small businesses.

Operating lease commitments				
	(	Group		
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
No later than 1 year	87,842	81,145	91,494	89,482
Later than 1 year and no later than 5 years	260,147	253,369	357,962	343,778
Later than 5 years	140,856	144,125	1,041,422	1,061,220
Total	488,845	478,639	1,490,878	1,494,480

The major part of operating lease commitments of the Bank relates to the operating lease rentals to NBG Pangaea Reic, a real estate investment company of the Group. The leases typically run for a period of up to 20 years, with an option to renew the lease after the period. However, the Bank may terminate them following a three-month notice.

# Share capital, share premium and treasury shares

### Share Capital - Ordinary Shares

The total number of ordinary shares as at 31 December 2011 and 31 December 2010 was 956,090,482, with a nominal value of €5.0 per share.

# Share Capital - Preference Shares

On 6 June 2008, the Bank issued 25.000.000 non-cumulative, non-voting, redeemable preference shares, of a nominal value of €0.3 each. The shares were offered at a price of USD 25 per preference share in the form of American Depositary Shares in the United States and are evidenced by American Depositary Receipts and listed on the New York Stock Exchange. The annual dividend is set to USD 2.25 per preference share.

On 21 May 2009, following the Extraordinary General Meeting of the Bank's Shareholders held on 22 January 2009, the Bank issued, 70,000,000 Redeemable Preference Shares at a nominal value of €5.0 each with the cancellation of the pre-emptive rights of the existing shareholders in favour of the Greek State, in accordance with the Law 3723/2008.

On 22 December 2011, the Extraordinary General Meeting of the Bank's Shareholders approved a) the share capital increase by  $\\mathcal{1}$ , 000 million through the issue of additional 200,000,000 Redeemable Preference Shares at a nominal value of  $\\mathcal{1}$ 5.0 each with the cancellation of the pre-emptive rights of the existing shareholders in favour of the Greek State, in accordance with the Law 3723/2008 and b) the revocation of the decision of the Extraordinary General Meeting of the Bank's Shareholders held on 26 November 2010 regarding the repurchase by the Bank of the 70,000,000 Redeemable Preference Shares in favour of the Greek State, in accordance with the Law 3723/2008.

On 30 December 2011, following the above decision, the Bank issued the 200,000,000 Redeemable Preference Shares at a nominal value of €5.0 each.

#### Share Capital - Total

Following the above, the total paid-up share capital of the Bank amounts to €6,137,952 divided into:

	Bank			
	# of shares	Par value	Amount	
Ordinary shares	956,090,482	5,0	4,780,452	
Non-cumulative, non-voting, redeemable preference shares	25,000,000	0,3	7,500	
Redeemable preference shares in favour of the Greek State	270,000,000	5,0	1,350,000	
Total share capital			6,137,952	

# Share premium

The movement of the share premium is as follows:

	(	Group	Bank		
	2011	2010	2011	2010	
At 1 January	3,327,740	3,335,881	3,326,321	3,335,881	
Share capital increase above nominal value through					
ordinary shares	-	69,810	-	69,810	
Share capital issue costs net of tax	(1,677)	(77,951)	(1,698)	(79,370)	
At 31 December	3,326,063	3,327,740	3,324,623	3,326,321	

Movements in share premium account under "Share capital issue costs net of tax" relate to deferred taxes due to changes in tax rates in 2011.

### Treasury shares

Following the restrictions of Law 3723/2008 regarding the Hellenic Republic's Bank Support Plan, the Bank possesses no treasury shares. At a Group level, the treasury shares transactions are conducted by National Securities S.A. At 31 December 2011, the treasury shares transactions are summarized as follows:

	Group		
	No of shares	€'000s	
At 1 January 2010	337,350	10,626	
Purchases	15,620,293	157,376	
Sales	(15,213,954)	(163,101)	
At 31 December 2010	743,689	4,901	
Purchases	41,381,705	168,057	
Sales	(42,062,422)	(172,848)	
At 31 December 2011	62,972	110	

Reserves & retained earnings				
	Gr	Group		
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Statutory reserve	387,929	401,710	279,093	279,093
Available-for-sale securities reserve	(324,348)	(1,824,722)	(163,651)	(1,473,298)
Currency translation differences reserve	(1,328,070)	(599,661)	477	(186)
Other reserves and retained earnings	(8,922,533)	3,216,782	(10,644,010)	1,510,238
Total	(10,187,022)	1,194,109	(10,528,091)	315,847

Non-controlling interest			
	Group		
	2011	2010	
At 1 January	834,693	857,376	
(Acquisitions) /disposals	(767,089)	(56,857)	
Share of net profit of subsidiaries	19,148	34,902	
Movement in the available-for-sale securities reserve	(66)	(6,677)	
Cash flow hedge, net of tax	12	(21)	
Foreign exchange differences	(3,057)	5,970	
At 31 December	83,641	834,693	

### Preferred securities

NBG Funding Ltd ("NBG Funding"), a wholly owned subsidiary of the Bank, has issued Non – Cumulative Non Voting Preferred Securities guaranteed on a subordinated basis by the Bank. All preferred securities are perpetual. However, the preferred securities may be redeemed at par by NBG Funding, in whole but not in part, ten years after their issue or on any dividend payment date falling thereafter subject to the consent of the BoG.

Within 2011, the Bank proceeded in the purchase of an additional portion of the outstanding preferred securities of an aggregate nominal amount of €19.0 million of series A, B and D, GBP 11.1 million of series E and USD 1.9 million of series C.

On 3 January 2012, the Bank announced a voluntary tender offer (the "Offer") for the acquisition of any and all of the five series of the preferred securities issued by NBG Funding Ltd. Based upon the aggregate nominal amounts of the securities validly tendered for purchase pursuant to the Offer, the Bank has determined that the final aggregate nominal amount of each series accepted for purchase is as follows:



Securities	Purchase Price	Aggregate nominal amount in million accepted for purchase pursuant to the Offer	Aggregate nominal amount in million not held by the Bank after the settlement date <sup>(1)</sup>
Series A	45%	€52,1	€58,3
Series B	45%	€34,0	€39,8
Series C	45%	USD 47,5	USD 39,0
Series D	45%	€31,2	€37,0
Series E	45%	GBP 39,2	€17,1

<sup>(</sup>i) For each series, determined as the aggregate nominal outstanding amount of the relevant series less (i) Securities purchased by the Bank prior to the commencement of the relevant Offer and (ii) Securities purchased by the Bank pursuant to the relevant Offer. The settlement date for the purchase by the Bank of the preferred securities that were validly tendered was the 19 January 2012 and the purchase was funded by existing liquidity reserves of the Bank.

The movement of preferred securities is as follows:

	Series A Innovative pre	Series E ferred securities	Series B Non-i	Series C nnovative preferred	Series D securities	Total
At 1 January 2010	165,693	133,404	78,618	64,112	74,865	516,692
Purchases	(40,281)	(57,500)	(3,916)	(2,754)	(3,687)	(108,138)
Foreign exchange rate differences	-	2,413	-	4,793	-	7,206
31 December 2010 &						
1 January 2011	125,412	78,317	74,702	66,151	71,178	415,760
Purchases	(15,076)	(12,932)	(957)	(1,429)	(3,015)	(33,409)
Foreign exchange rate differences		1,992		2,116		4,108
31 December 2011	110,336	67,377	73,745	66,838	68,163	386,459

### Dividends

In accordance with article 1, par. 3 of Law 3723/2008 regarding the Hellenic Republic's Bank Support Plan, banks participating in the plan are allowed to distribute dividends of up to 35% of distributable profits, in accordance with article 3, par. 1 of Law 148/1967. The Greek State representative in the Board of Directors of the participating banks has a veto right in any decision that relates to dividend distribution

In accordance with article 19 of Law 3965/2011 (Government Gazette No 113-18/5/2011), for the year 2010, banks participating in the plan were allowed to distribute dividends only in the form of shares. However, these could not be treasury shares.

On 23 June 2011, the annual Ordinary General Meeting of the Bank's shareholders approved the non-distribution of dividends to any class of shares, that is, to the redeemable preference shares held by the Greek State, the non-cumulative, non-voting redeemable preference shares and the ordinary shares.

# Acquisitions, disposals & other capital transactions Acquisitions

In 2011, the following transactions took place:

On 29 June 2011, the Bank acquired 49.9% of CPT Investments Ltd from Credit Suisse AG An amount of  $\[ \in \]$  775.6 million (being the proportionate share of the carrying amount of the net assets of CPT Investments Ltd attributed to non-controlling interests) has been deducted from non-controlling interests. The difference of  $\[ \in \]$  187.8 million between the decrease in the non-controlling interests and the consideration paid has been recognized directly in the Group's equity as follows: amount of  $\[ \in \]$  38.1 million has been debited to the "Available for sale securities" reserve and amount of  $\[ \in \]$  225.9 million has been credited to retained earnings. The total consideration amounted to  $\[ \in \]$  587.8 million of which amount of  $\[ \in \]$  42.9 million was paid in cash. The remaining amount of  $\[ \in \]$  544.9 million related to waive of debt from Credit Suisse AG. After this acquisition the Bank holds the 100% of CPT Investments Ltd.

On 20 July 2011, the Board of Directors of Ethnodata SA and its wholly owned subsidiary Ethnoplan SA, approved the merger of the two companies with the absorption of the second by Ethnodata SA. The merger balance sheet date was the 30 June 2011. The merger was completed on 25 November 2011.

On 19 September 2011 the Bank established in UK the Special Purpose Entity SPITI PLC, for the purposes of mortgage loans securitization, in which the Bank has a beneficial interest.

On 22 September 2011 the Bank established in UK the Special Purpose Entity AGORAZO PLC, for the purposes of consumer loans securitization, in which the Bank has a beneficial interest.

On 22 September 2011 the Bank established in UK the Special Purpose Entity AUTOKINITO PLC, for the purposes of car loans securitization, in which the Bank has a beneficial interest.

On 12 December 2011, following the Finansbank's Board of Directors decision of 4 August 2011, the share capital of the Finansbank was increased by TL 120 million (TL 116.3 million in cash and TL 3.7 million by capitalization of reserves). The cash contribution by the Group amounted to TL 110.3 million and was covered by the reinvestment of the dividend received.

In December 2011 the liquidation of ETEBA Bulgaria AD was completed.

During 2011 Finansbank disposed of 20.88% of its participation in Finans Yatirim Ortakligi AS (Finans Investment Trust) for TL 5.0 million. After this transaction the Group owns 54.56% of the entity while the retained earnings and the non-controlling interests have been increased by €0.6 million and €1.5 million respectively.

The movement of investments in subsidiaries is summarised as follows:

	Ва	nk
	2011	2010
Balance at the beginning of the period	8,415,877	8,064,609
Acquisition of additional interest/ share capital increase in existing subsidiaries	703,866	346,401
Disposals / Liquidations	(345)	-
Transfers from investment securities	-	4,867
Impairment charge	(658,471)	
Balance at the end of the period	8,460,927	8,415,877

The impairment charge recognized in 2011 relates mainly to the cost of investment in Ethniki Hellenic General Insurance of €395.4 million mainly due to the impact of the PSI on the subsidiary's financial position, to the cost of investment in Vojvodjanska Banka of €186.7 million and EKTENEPOL of €32.5 million due to the deterioration of the economic conditions in Serbia and Greece respectively. Acquisition of additional interest and/or share capital increase in existing subsidiaries include the following transactions:

	Ba	ank
	2011	2010
Share capital increase in Finansbank	39,184	227,945
Acquisition of additional interest (27.32%) in Finans Finansal Kiralama AS (Finans Leasing)	-	42,274
Acquisition of additional interest (49.9%) CPT Investments Ltd	587,809	-
Share premium increase in NBG International Holdings BV	10,000	21,939
Share capital increase of SPEs	61,476	45,591
Share capital increase in NBG Leasing IFN SA	5,000	-
Share capital increase of other subsidiaries	397	8,652
Total	703,866	346,401

Group companies					_	
			Gro	up %	Bank %	
Subsidiaries	Country T	ax years unaudited	31.12.2011	31.12.2010	31.12.2011	31.12.2010
National Securities SA	Greece	2009-2011	100.00%	100.00%	100.00%	100.00%
Ethniki Kefalaiou SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
NBG Asset Management Mutual Funds SA	Greece	2009-2011	100.00%	100.00%	81.00%	81.00%
Ethniki Leasing SA	Greece	2010-2011	100.00%	100.00%	93.33%	93.33%
NBG Property Services SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
Pronomiouhos SA Genikon Apothikon Hellados	Greece	2009-2011	100.00%	100.00%	100.00%	100.00%
NBG Bancassurance SA	Greece	2010-2011	100.00%	100.00%	99.70%	99.70%
Innovative Ventures SA (I-Ven) (3)	Greece	2005-2011	100.00%	100.00%	-	-
Ethniki Hellenic General Insurance SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
Audatex Hellas SA	Greece	2010-2011	70.00%	70.00%	-	-
National Insurance Brokers SA	Greece	2010-2011	95.00%	95.00%	-	-
ASTIR Palace Vouliagmenis SA	Greece	2006-2011	85.35%	85.35%	85.35%	85.35%
Grand Hotel Summer Palace SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
NBG Training Center SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
Ethnodata SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
KADMOS SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
DIONYSOS SA	Greece	2010-2011	99.91%	99.91%	99.91%	99.91%
EKTENEPOL Construction Company SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
Mortgage, Touristic PROTYPOS SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
Hellenic Touristic Constructions SA	Greece	2010-2011	77.76%	77.76%	77.76%	77.76%
Ethnoplan SA (5)	Greece	-	-	100.00%	-	-
Ethniki Ktimatikis Ekmetalefsis SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
Ethniki Factors SA	Greece	2010-2011	100.00%	100.00%	100.00%	100.00%
NBG Pangaea Reic	Greece	-	100.00%	100.00%	100.00%	100.00%
Finansbank AS(*)	Turkey	2006-08 & 2010-11	99.81%	99.80%	82.23%	82.22%
Finans Finansal Kiralama AS (Finans Leasing) (*)	Turkey	2010-2011	94.11%	94.11%	29.87%	29.87%
Finans Yatirim Menkul Degerler AS (Finans Invest) (*)	Turkey	2009-2011	99.77%	99.76%	0.20%	0.20%
Finans Portfoy Yonetimi AS (Finans Portfolio Management) (*)	Turkey	2006-2011	99.77%	99.76%	0.01%	0.01%
Finans Yatirim Ortakligi AS (Finans Investment Trust) (*)	Turkey	2006-2011	54.56%	75.44%	5.30%	5.30%
IBTech Uluslararasi Bilisim Ve Iletisim Teknolojileri AS (IB Tech) (*)	Turkey	2006-2011	99.71%	99.71%	-	-
Finans Emeklilik ve Hayat AS (Finans Pension) (*)	Turkey	2007-2011	99.81%	99.80%	-	_
Finans Tuketici Finansmani AS(Finans Consumer Finance) (*)	Turkey	2009-2011	99.81%	99.80%	-	-
Finans Faktoring Hizmetleri AS (Finans Factoring)(*)	Turkey	2009-2011	99.81%	99.80%	-	-
NBG Malta Holdings Ltd	Malta	2006-2011	100.00%	100.00%	-	-
NBG Bank Malta Ltd	Malta	2005-2011	100.00%	100.00%	_	_
United Bulgarian Bank AD - Sofia (UBB)	Bulgaria	2010-2011	99.91%	99.91%	99.91%	99.91%
UBB Asset Management Inc	Bulgaria	2004-2011	99.92%	99.92%	_	_
UBB Insurance Broker AD	Bulgaria	2007-2011	99.93%	99.93%	-	-
UBB Factoring EOOD	Bulgaria	2009-2011	99.91%	99.91%	_	_
Interlease EAD, Sofia	Bulgaria	2004-2011	100.00%	100.00%	100.00%	100.00%
Interlease Auto EAD	Bulgaria	2008-2011	100.00%	100.00%	-	_
ETEBA Bulgaria AD, Sofia (2)	Bulgaria	_	_	100.00%	_	92.00%
NBG Securities Romania SA	Romania	2006-2011	100.00%	100.00%	100.00%	100.00%
Banca Romaneasca SA (*)	Romania	2006-2011	99.28%	99.28%	99.28%	99.28%
NBG Factoring Romania IFN SA	Romania	2010-2011	99.29%	-	-	-
NBG Leasing IFN SA	Romania	2007-2011	99.29%	100.00%	100.00%	100.00%
SC Garanta Asigurari SA	Romania	2003-2011	94.96%	94.96%	-	-
Vojvodjanska Banka a.d. Novi Sad <sup>(2)</sup>	Serbia	2005-2011	100.00%	100.00%	100.00%	100.00%
NBG Leasing d.o.o. Belgrade	Serbia	2004-2011	100.00%	100.00%	100.00%	100.00%
NBG Services d.o.o. Belgrade	Serbia	2009-2011	100.00%	100.00%	-	-
Stopanska Banka AD-Skopje (*)	FYROM	2005-2011	94.64%	94.64%	94.64%	94.64%
Stopanisha Danna AD Shopje ( )	i inolvi	2000 2011	J4.04/0	J4.04/0	J4.U4/0	J4.U4/0

			Gr	oup %	Ban	k %
Subsidiaries	Country	Tax years unaudited	31.12.2011	31.12.2010	31.12.2011	31.12.2010
NBG Greek Fund Ltd	Cyprus	2006-2011	100.00%	100.00%	100.00%	100.00%
National Bank of Greece (Cyprus) Ltd	Cyprus	2006-2011	100.00%	100.00%	100.00%	100.00%
National Securities Co (Cyprus) Ltd	Cyprus	-	100.00%	100.00%	-	-
NBG Management Services Ltd	Cyprus	2010-2011	100.00%	100.00%	100.00%	100.00%
Ethniki Insurance (Cyprus) Ltd	Cyprus	2006-2011	100.00%	100.00%	-	-
Ethniki General Insurance (Cyprus) Ltd	Cyprus	2006-2011	100.00%	100.00%	-	-
The South African Bank of Athens Ltd (SABA)	S. Africa	2010-2011	99.71%	99.71%	94.36%	94.36%
NBG Asset Management Luxemburg SA	Luxembourg	-	100.00%	100.00%	94.67%	94.67%
NBG International Ltd	UK	2004-2011	100.00%	100.00%	100.00%	100.00%
NBGI Private Equity Ltd	UK	2004-2011	100.00%	100.00%	-	-
NBG Finance Plc	UK	2004-2011	100.00%	100.00%	100.00%	100.00%
NBG Finance (Dollar) Plc	UK	2008-2011	100.00%	100.00%	100.00%	100.00%
NBG Finance (Sterling) Plc	UK	2008-2011	100.00%	100.00%	100.00%	100.00%
NBG Funding Ltd	UK	-	100.00%	100.00%	100.00%	100.00%
NBGI Private Equity Funds	UK	2004-2011	100.00%	100.00%	-	-
Revolver APC Limited (Special Purpose Entity)	UK	2010-2011	-	-	-	-
Revolver 2008-1 Plc (Special Purpose Entity)	UK	2011	-	-	-	-
Titlos Plc (Special Purpose Entity)	UK	2011	-	-	-	-
Spiti Plc (Special Purpose Entity) (4)	UK	2011	-	-	-	-
Autokinito Plc (Special Purpose Entity) (4)	UK	2011	-	-	-	-
Agorazo Plc (Special Purpose Entity) (4)	UK	2011	-	-	-	-
NBGI Private Equity SAS	France	2008-2011	100.00%	100.00%	-	-
NBG International Holdings BV	The Netherlands	2010-2011	100.00%	100.00%	100.00%	100.00%
CPT Investments Ltd	Cayman Islands	-	100.00%	50.10%	100.00%	50.10%

<sup>(\*) %</sup> of participation includes the effect of put and call option agreements.

The Special Purpose Entities (SPE's) have been created in order the Bank to securitize certain financial assets. The notes issued by the SPE's are held in total by the Bank and therefore the Bank is the only beneficiary on these SPE's and thus they are controlled and as a result are consolidated as subsidiaries.

# Independent auditor's fees

Deloitte Hadjipavlou Sofianos & Cambanis SA has served as our principal independent public accountant for the year ended 31 December 2011. The following table presents the aggregate fees for professional audit services and other services rendered by the Group's principal accounting firm Deloitte Hadjipavlou Sofianos & Cambanis SA, which is a member firm of Deloitte Touche Tohmatsu Limited ("DTTL"), other member firms of DTTL and their respective affiliates (collectively "Deloitte.").

	Group		Bank	
	2011	2010	2011	2010
Audit fees	3,915	3,997	1,465	1,204
Audit related fees	2,490	4,626	1,807	2,923
Tax fees	280	234	20	15
All other fees	25	20	11	20
Total	6,710	8,877	3,303	4,162

<sup>(1)</sup> National Bank of Greece a.d. Beograd which was merged with Vojvodjanska Banka a.d. Novi Sad has been tax audited up to 2000.

<sup>(2)</sup> From 2nd quarter 2011 ETEBA Bulgaria AD, Sofia is not included in NBG Group accounts due to its liquidation.

<sup>(3)</sup> Companies under liquidation.

<sup>(4)</sup> Special Purpose Entities incorporated in 2011.

<sup>(5)</sup> Ethnoplan SA was merged with Ethnodata SA.



#### Reclassifications of financial assets

In 2011, the Group reclassified €795.9 million Greek government bonds from available-for-sale into loans-and-receivables, because, at the date of reclassification, the reclassified bonds were not quoted in an active market and the Group had the intention and ability to hold them for the foreseeable future or until maturity.

The following table presents the carrying amount by nature of security, as at December 31, 2011, of the financial instruments that have been reclassified during 2008 and 2010, other than the Greek government bonds that are impaired due to the PSI and exchanged in March and April 2012 with new Greek government bonds:

31 December 2011	Transferred in 2008	<b>Group</b> Transferred in 2010	Total	Transferred in 2008	Bank Transferred in 2010	Total
Greek Government bonds	_	752,614	752,614	-	752,614	752,614
Sovereign bonds (other than GGBs)	23,642	28,317	51,959	447	28,317	28,764
Debt securities issued by Greek financial institutions	56,051	101,755	157,806	56,051	50,149	106,200
Debt securities issued by foreign financial institutions	37,805	61,204	99,009	9,424	61,204	70,628
Debt securities issued by Greek corporate entities	13,221	90,766	103,987	-	90,766	90,766
Debt securities issued by foreign corporate entities	16,664	-	16,664	-	-	-
Equity securities	8,663	-	8,663	4,691	-	4,691
Mutual funds	27,256	_	27,256	-	-	
Total	183,302	1,034,656	1,217,958	70,613	983,050	1,053,663

The information presented below refers to reclassifications of financial instruments, other than the Greek government bonds that are impaired due to the PSI:

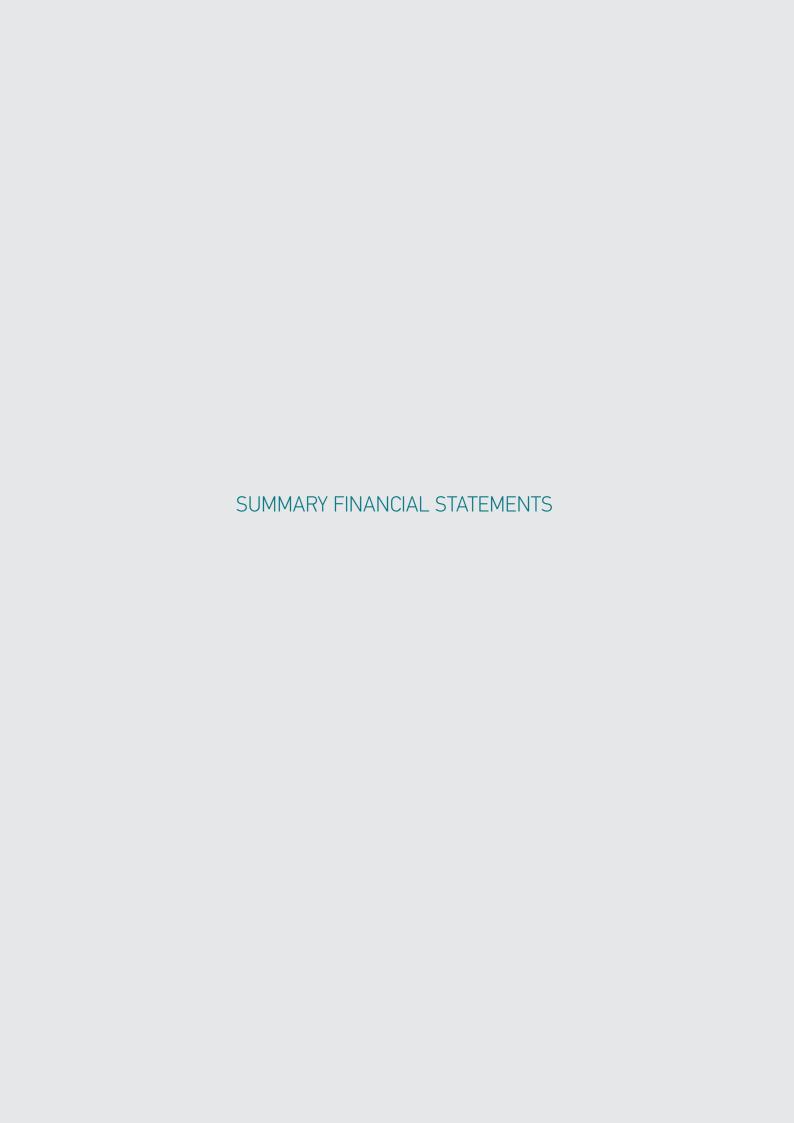
#### Group

In 2010, the Group reclassified certain available-for-sale and trading securities as loans-and-receivables, and certain trading securities to the available-for-sale and held-to-maturity categories. On 31 December 2011, the carrying amount of the securities reclassified in 2010 and have not matured, or been sold is  $\le$ 1,034.7 million. The market value of these securities is  $\le$ 429.6 million. During the year ended 31 December 2011,  $\le$ 31.8 million interest income and  $\le$ 454.8 million impairment loss were recognised. Had these securities not been reclassified, net trading income and results from investments securities for the year ended 31 December 2011 would have been lower by  $\le$ 59.8 million ( $\le$ 50.5 million net of tax), and the available-for-sale securities reserve, net of tax, would have been lower by  $\le$ 100.3 million.

In 2008, the Group reclassified certain available-for-sale and trading securities as loans-and-receivables, and certain trading securities to the available-for-sale and held-to-maturity categories. On 31 December 2011, the carrying amount of the securities reclassified in 2008 and have not matured, been sold or reclassified again subsequently is  $\\eqref{1}83.3$  million. The market value of these securities is  $\\eqref{1}60.9$  million. During the year ended 31 December 2011,  $\\eqref{2}5.8$  million interest income,  $\\eqref{2}0.3$  million dividend income and  $\\eqref{2}0.3$  million impairment loss were recognised. Had these securities not been reclassified, net trading income and results from investments securities for the year ended 31 December 2011 would have been lower by  $\\eqref{2}13.1$  million ( $\\eqref{2}10.4$  million net of tax), and the available-for-sale securities reserve, net of tax, would have been higher by  $\\eqref{2}6.8$  million.

## **Bank**

In 2010, the Bank reclassified certain available-for-sale and trading securities as loans-and-receivables, and certain trading securities to the available-for-sale and held-to-maturity categories. On 31 December 2011, the carrying amount of the securities reclassified in 2010 and have not matured, or been sold is  $\in$ 983.1 million. The market value of these securities is  $\in$ 378.0 million. During the year ended 31 December 2011,  $\in$ 27.2 million interest income and  $\in$ 454.8 million impairment loss were recognised. Had these securities not been reclassified, net trading income and results from investments securities for the year ended 31 December 2011 would have been lower by  $\in$ 46.4 million ( $\in$ 37.1 million net of tax), and the available-for-sale securities reserve, net of tax, would have been lower by  $\in$ 113.8 million.



# INDEPENDENT AUDITOR'S REPORT

To the Shareholders of "NATIONAL BANK OF GREECE SA"

# Report on the Stand-Alone and Consolidated Financial Statements

We have audited the accompanying stand-alone and consolidated financial statements of "NATIONAL BANK OF GREECE SA" (the "Bank") and its subsidiaries (the "Group"), which comprise the stand-alone and consolidated statement of financial position as at December 31, 2011, and the stand-alone and consolidated statements of income, comprehensive income, changes in equity and cash flows for the year then ended, as well as a summary of significant accounting policies and other explanatory notes.

# Management's Responsibility for the Stand alone and Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of these stand alone and consolidated financial statements in accordance with International Financial Reporting Standards as these have been adopted by the European Union, as well as for the internal controls that Management considers necessary for the preparation of stand alone and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

### Auditor's Responsibility

Our responsibility is to express an opinion on these stand alone and consolidated financial statements based on our audit. We conducted our audit in accordance with the International Standards on Auditing. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance whether the stand alone and consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the stand alone and consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risk of material misstatement of the stand alone and consolidated financial statements, whether due to fraud or error. In making this risk assessment, the auditor considers internal control relevant to the entity's preparation and fair presentation of the stand alone and consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the stand alone and consolidated financial statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

# **Opinion**

In our opinion, the accompanying stand alone and consolidated financial statements present fairly, in all material respects, the financial position of the Bank and the Group as of December 31, 2011, and of their financial performance and their cash flows for the year then ended in accordance with International Financial Reporting Standards as these were adopted by the European Union.

# Emphasis of Matter

Without qualifying our opinion, we draw attention to the disclosures made in note 2.2 to the stand alone and consolidated financial statements, which refer to the impact of the impairment losses resulting from the Greek sovereign debt restructuring on the Bank's and the Group's regulatory and accounting capital, the planned actions to restore the capital adequacy of the Bank and the Group and the existing uncertainties that could adversely affect the going concern assumption until the completion of the recapitalisation process.

# Report on Other Legal and Regulatory Requirements

- a) The Directors' Report includes a Corporate Governance Statement which provides the information required according to the provisions of paragraph 3d of Article 43a and paragraph 3f of article 107 of Codified Law 2190/1920.
- b) We have agreed and confirmed the content and consistency of the Directors' Report to the accompanying standalone and consolidated financial statements according to the provisions of the articles 43a, 108 and 37 of the Codified Law 2190/1920.

Athens, April 20, 2012 The Certified Public Accountant

# Deloitte.

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# National Bank of Greece SA

#### FINANCIAL DATA AND INFORMATION FOR THE PERIOD FROM 1 JANUARY 2011 TO 31 DECEMBER 2011

(Published in accordance with article 135 of Law 2190/1920, for enterprises preparing annual stand-alone and consolidated financial statements in accordance with IFRS) (amounts in thousand EURO)

#### Company Information

Headquarters: Register Numbers of SA: Supervising Prefecture:

Date of approval of Financial Statements by BoD:

Certified Public Accountant - Auditor:

Audit Firm:

Independent Auditor's report:

Issue date of Independent Auditor's report:

Website:

86, Eolou Str., 102 32 Athens

6062/06/B/86/01 Athens Prefecture 20 April 2012

Manos Pelidis (RN SOEL 12021)

Deloitte, Hadjipavlou Sofianos & Cambanis SA

Unqualified opinion - Emphasis of matter

20 April 2012 www.nba.ar

The financial data and information derived from the financial statements provide a summarized view of the financial position and results of National Bank of Greece and its Group. We therefore suggest to the user, before proceeding to any investment decision or other transaction with the Bank, to visit National Bank of Greece's web-site (www.nbg.gr), where Financial Statements are posted, together with the report of the Auditors.

#### Statement of Financial Position Group Bank 31.12.2011 31.12.2010 31.12.2011 31.12.2010 **Assets** 4.082.153 1.566.583 5.069.505 Cash and balances with central banks 7.530.483 Due from banks (net) 4.635.846 3.321.454 8.026.009 7.091.089 2.682.655 1.723.112 Financial assets at fair value through profit or loss 2.457.257 1.082.292 Derivative financial instruments 3.748.757 1.731.192 2.923.318 1.542.961 71.496.221 77.261.870 Loans and advances to customers (net) 52.891.237 58.242.991 Available for sale investment securities 4.509.230 7.924.354 1.157.474 3.035.212 Held to maturity investment securities 1.023.666 3.626.284 1.322.230 1.974.534 5.155.545 8.816.749 Loans and receivables investment securities 4.684.066 7.034.903 213.180 Investment property 274.470 Investments in subsidiaries 8.460.927 8.415.877 39.246 Investments in associates 42.484 5.803 7.298 Goodwill, software & other intangible assets 2.136.821 2.560.197 128.953 140.807 2.070.446 Property & equipment 2.022.676 353.093 388.104 470.701 1.000.326 366.168 Deferred tax assets 1.309.609 Insurance related assets and receivables 700.638 822.066 Current income tax advance 242.359 136.667 242.359 136.667 Other assets 2.786.346 2.474.719 2.067.402 1.755.936 Non current assets held for sale 20.513 21.885 20.513 20.513 106.869.989 120.744.605 87.307.550 96.304.857 Total assets Liabilities Due to banks 34.108.238 29.898.696 33.870.863 28.869.460 1.790.556 1.404.051 Derivative financial instruments 4 469 460 3 940 485 59.543.640 68.039.037 44.025.167 52.471.008 Due to customers Debt securities in issue 1.727.864 2.370.303 1.059.297 2.103.771 Other borrowed funds 1.712.074 2.061.773 984.671 1.078.098 Insurance related reserves and liabilities 2.685.450 2.834.752 119.016 Deferred tax liabilities 62.674 275.936 79.887 Retirement benefit obligations 152.012 208.891 Current income tax liabilities 52.040 76.091 21.925 2.497.016 Other liabilities 2.485.630 4.283.692 1.496.537 107.123.006 Total liabilities 109.839.252 88.373.066 87.524.737 SHAREHOLDERS' EQUITY Share capital 6.137.952 5.137.952 6.137.952 5.137.952 3.327.740 Share premium account 3.326.063 3.324.623 3.326.321 Less: treasury shares (4.901)(110)(10.187.022) Reserves and retained earnings 1.194.109 (10.528.091)315 847 Equity attributable to NBG shareholders (723.117)9.654.900 (1.065.516)8.780.120 Non-controlling interests 83.641 834.693 Preferred securities 386.459 415.760 (253.017)10.905.353 (1.065.516)8.780.120 Total equity Total equity and liabilities 106.869.989 120.744.605 87.307.550 96.304.857

Statement of Changes in Equity				
	Group		Bank	
	From 1.1 to		From 1.1 to	
	31.12.2011 31.12.2010		31.12.2011	31.12.2010
Balance at beginning of period	10.905.353	9.827.518	8.780.120	8.224.161
Changes during the period:				
Total comprehensive expense, net of tax	(11.532.648)	(466.384)	(10.834.438)	(1.122.350)
Share capital increase	991.200	1.737.103	991.200	1.735.684
Dividends declared	(16.588)	(92.476)	-	(71.558)
Net change in treasury shares	4.791	5.725	-	-
Other changes	(605.125)	(106.133)	(2.398)	14.183
Balance at end of period	(253.017)	10.905.353	(1.065.516)	8.780.120

Statement of Comprehensive Income	G	iroup	Ban	k	
		<b>Group</b> From 1.1 to		From 1.1 to	
	31.12.2011	31.12.2010	31.12.2011	31.12.2010	
Interest and similar income	6.586.518	6.402.037	3.765.458	3.508.362	
Interest expense and similar charges	(2.743.710)	(2.254.080	(1.435.677)	(1.079.585)	
Net interest income	3.842.808	4.147.957	2.329.781	2.428.777	
Fee and commission income	706.628	710.084	235.781	274.348	
Fee and commission expense	(212.779)	(100.159)	(191.654)	(73.381)	
Net fee and commission income	493.849	609.925	44.127	200.967	
Earned premia net of reinsurance	789.157	967.007	-	-	
Net claims incurred	(642.438)	(891.159)	-	-	
Earned premia net of claims and commissions	146.719	75.848	-	-	
Net trading income/(loss) and results from					
investment securities	(27.719)	(138.308)	(33.073)	(387.382)	
Net other expense	(83.697)	(55.946)	(33.932)	(130.113)	
Total income	4.371.960	4.639.476	2.306.903	2.112.249	
Personnel expenses	(1.616.424)	(1.530.459)	(1.036.593)	(931.800)	
General, administrative and other operating expenses Deprec. & amortis. on properties, equipment,	(721.430)	(781.832)	(345.573)	(368.627)	
software & other intang. assets Amortis. & write offs of intang. assets recognised	(202.869)	(199.818)	(90.427)	(87.277)	
on business combinations	(23.362)	(27.442)	-	-	
Finance charge on put options of non-controlling interests	(6.892)	(13.566)	(6.892)	(13.566)	
Credit provisions and other impairment charges	(3.439.026)	(1.450.327)	(3.407.844)	(1.044.586)	
Impairment of Greek Government Bonds	(11.783.256)	-	(10.555.139)	-	
Share of profit of associates	1.179	1.598	-	-	
Profit/(loss) before tax	(13.420.120)	637.630	(13.135.565)	(333.607)	
Social responsibility tax and non off-settable taxes	-	(79.101)	-	(74.900)	
Tax benefit / (expense)	1.095.236	(118.105)	990.817	47.655	
Profit / (loss) for the period, net of tax (A)	(12.324.884)	440.424	(12.144.748)	(360.852)	
Attributable to:					
Non-controlling interests	19.148	34.902	-	-	
NBG equity shareholders	(12.344.032)	405.522	(12.144.748)	(360.852)	
Other comprehensive income/(expense), net of tax (B)	792.236	(906.808)	1.310.310	(761.498)	
Total comprehensive income/(expense), net of tax (A+B)	(11.532.648)	(466.384)	(10.834.438)	(1.122.350)	
Attributable to:					
Non-controlling interests	20.145	41.380	-	-	
NBG equity shareholders	(11.552.793)	(507.764)	(10.834.438)	(1.122.350)	
Earnings/(losses) per share (Euro) - Basic and Diluted:	€(12,9264)	€0,4611	€(12,7032)	€(0,5669)	

Statement of Cash Flows				
	(	Group	Bank	
	Fro	om 1.1 to	From 1	.1 to
	31.12.2011	31.12.2010	31.12.2011	31.12.2010
Net cash flows from / (used in):				
Operating activities	(2.254.258)	3.544.327	(1.474.866)	4.602.565
Investing activities	1.713.620	(3.168.695)	871.269	(2.229.082)
Financing activities	(1.378.183)	2.993.802	(1.155.876)	2.268.344
Net increase / (decrease) in cash and cash				
equivalents in the period	(1.918.821)	3.369.434	(1.759.473)	4.641.827
Effect of foreign exchange rate changes on cash				
and cash equivalents	(125.877)	26.834	545	45.970
Total cash inflows / (outflows) for the period	(2.044.698)	3.396.268	(1.758.928)	4.687.797
Cash and cash equivalents at beginning of period	6.315.444	2.919.176	8.749.334	4.061.537
Cash and cash equivalents at end of period	4.270.746	6.315.444	6.990.406	8.749.334

# The Board of Directors

Vassilios T. Rapanos	Non-Executive Member - Chairman of the BoD
Apostolos S. Tamvakakis	Executive Member - Chief Executive Officer
Anthimos C. Thomopoulos	Executive Member - Deputy Chief Executive Officer
Alexandros G. Tourkolias	Executive Member - Deputy Chief Executive Officer
Leonidas T. Theoklitos	Executive Member - Deputy Chief Executive Officer
Ioannis C. Giannidis	Non-Executive Member
Ioannis P. Panagopoulos	Non-Executive Member
Avraam J. Triantafillidis	Non-Executive Member
H.E. the Metropolitan of Ioannina Theoklitos	Independent Non-Executive Member
Stefanos C. Vavalidis	Independent Non-Executive Member
Georgios P. Zanias	Independent Non-Executive Member
Alexandra T. Papalexopoulou - Benopoulou	Independent Non-Executive Member
Petros K. Sabatacakis	Independent Non-Executive Member
Maria A. Fragista	Independent Non-Executive Member
Spiridon J. Theodoropoulos	Independent Non-Executive Member
Alexandros N. Makridis	Greek State representative

#### Notes

1) The auditors' report is with "Unqualified opinion – emphasis of matter". The emphasis of matter which refers to the going concern of the Group and the Bank due to impairment losses that arose from the participation of the Bank and the Group to the voluntary bond exchange programme of Greek State. Such losses have adversely impacted the financial position, the results, cash flows and regulatory ratios of the Bank and the Group. At December 31, 2011, the Group's capital adequacy ratio was below the minimum threshold of 8% (negative 2.6%).

The amount required for the restoration of the capital adequacy ratio to 8% is estimated by the Bank of Greece at €6,9 billion.

The going concern of the Bank is dependent on (a) raising sufficient funds to restore the Group's and the Bank's financial positions and maintain adequate levels of capital and (b) the continuing reliance on and the continuation of the Eurosystem liquidity facilities. The Directors have considered certain main factors in concluding that the Group and the Bank can continue to operate for the foreseeable future and that the adoption of the going concern basis in preparing the financial statements for the Group and the bank is appropriate. In this context, on 20 April 2012, HFSF in its letter to the Bank stated that, the Bank of Greece on 19 April 2012 replied to HFSF the following: i) the Bank is evaluated as viable and the Bank submitted a business plan which includes the time schedule for the implementation of the capital actions described therein, and this plan is evaluated as viable and reliable, ii) the amount required for the restoration of the capital adequacy ratio to the minimum 8%, determined to €6,9 billion and iii) the HFSF should officially reply to the Bank its intention to participate in the share capital increase or in the issuance of a convertible bond by the Bank under the provisions of L.3864/2010 up to the amount that has been determined by the Bank of Greece and is adequate to restore the Group's capital adequacy ratio i.e. €6,9 billion. In the same letter to the Bank, HFSF stated that will participate in the share capital increase or in the issuance of a convertible bond by the Bank up to the amount of €6,9 billion. Furthermore the HFSF will cover any amount of unsubscribed share capital and / or the convertible bonds and this commitment is valid up to 30 September 2012.

For additional information on the above see note 2 of the annual financial statements as of 31 December 2011.

- 2) The principal accounting policies that have been adopted are in accordance with the requirements of International Financial Reporting Standards ("IFRS") and are the same with those applied in the 2010 financial statements. Details are included in Note 2 of the annual financial statements as of 31 December 2011.
- 3) On 31 December 2011 the Group and the Bank, under the voluntary debt exchange programme for the Private Sector (PSI) recognized an impairment charge of the Greek Government Bonds and loans, €11.783,3 million and €10.555,1 million respectively. Apart from the above impairment charge, the Bank recognized additional impairment charge of €752,7 million relating to loans and assets which are guaranteed by the Greek State. For additional details see Notes 14 and 21 of the annual financial statements as of 31 December 2011.
- 4) The Bank has been audited by the tax authorities up to and including the year 2008. The financial years 2009 and 2010 will be audited by the tax authorities whereas the financial year 2011 is audited by the certified auditors of the Bank. The unaudited tax years of the subsidiary companies of the Group fully consolidated and associated are reflected in Notes 47 and 24 respectively of the annual financial statements as of 31 December 2011.
- 5) Cases under litigation or in arbitration as well as pending cases before the Courts or Arbitration Courts are not expected to have a material impact on the financial position or operations of the Group. As of 31 December 2011, the provisions recognized by the Group and the Bank, amounted to: a) for cases under litigation €85,4 million and €76,4 million respectively, b) for unaudited tax years €10,9 million and €8,9 million respectively and c) for other risks €43,9 million and €2,3 million respectively.
- 6) The number of Group and Bank employees as of 31 December 2011 was 34.698 and 12.189 respectively (31 December 2010: 36.866 and 12.775 respectively).
- 7) Related party transactions and balances as defined in IAS 24 are analyzed as follows: assets, liabilities, interest, commission and other income, interest, commission and other expense and off-balance sheet items with associated companies and joint ventures of the Group, as of 31 December 2011, amounted to €3,8 million, €14,5 million, €1,6 million, €8,3 million and €14,9 million respectively. The corresponding balances and transactions with subsidiaries, associated companies and joint ventures of the Bank as of 31 December 2011 were €8.219,2 million, €3.805,9 million, €211,5 million, €264,3 million and €3.278,7 million. Loans, deposits, letters of guarantee and total compensation of the members of the Board of Directors of the Bank, the General Managers and the members of the Executive Committees of the Bank, the key management of other Group companies, as well as the close members of family and entities controlled or jointly controlled by those persons amounted, as of 31 December 2011, to €26,2 million, €10,9 million, €0,2 million and €15,2 million respectively and for the Bank alone the corresponding amounts amounted

to €25,6 million, €5,1 million, €0,2 million and €8,1 million. The total receivables of the Group and the Bank from the employee benefits related funds as of 31 December 2011, amounted to €413,7 million and €413,6 million respectively. The total payables of the Group and the Bank to the employee benefits related funds as of 31 December 2011, amounted to €116,0 million and €40,9 million respectively.

- 8) Acquisitions, disposals & other capital transactions:
  - (a) On 29 June 2011, the Bank acquired 49,9% of CPT Investments Ltd from Credit Suisse AG. The total consideration amounted to €587,8 million of which amount of €42,9 million was paid in cash. The remaining amount related to waive of debt from Credit Suisse A.G. After this acquisition the Bank holds the 100% of CPT Investments Ltd.
  - (b) On 20 July 2011, the Board of Directors of Ethnodata S.A. and its wholly owned subsidiary Ethnoplan S.A., approved the merger of the two companies with the absorption of the second by Ethnodata S.A. The merger was completed on 25 November 2011.
  - (c) Since September 2011, the Bank established and consolidates Spiti Plc, Autokinito Plc and Agorazo Plc, Special Purpose Entities established in UK, in which the Bank has a beneficial interest.
  - (d) On 12 December 2011, the share capital of the Finansbank was increased by TL 120 million, following its Board of Directors decision of 4 August 2011. The cash contribution by the Group amounted to TL 110,3 million and was covered by the reinvestment of the dividend received.
  - (e) In December 2011 the liquidation of ETEBA Bulgaria AD was completed.
  - (f) During 2011 Finansbank disposed of 20,88% of its participation of the Group in Finans Yatirim Ortakligi A.S. (Finans Investment Trust) for TL 5,0 million. After this disposal the Group owns 54,56% of the entity.

Details are included in Note 46 of the financial statements as of 31 December 2011.

- 9) Included in Notes 24 & 47 of the annual financial statements as of 31 December 2011, are the group companies consolidated, their country of residence, the direct or indirect participation of the Bank in their share capital and the consolidation method applied for each such company. As of 31 December 2011 the following changes occurred in the Groups' structure:
  - a) Fully consolidated: The special purposes entities Spiti Plc, Autokinito Plc and Agorazo Plc are consolidated for the first time in the financial statements of 30 September 2011, while ETEBA Bulgaria A.D., Sofia is no longer included due to its liquidation. Additionally Ethnoplan is no longer included in the financial statements due to merger with Ethnodata.
  - b) Equity method: Europa Insurance Co S.A. is no longer included since it has been disposed of.
  - c) There are no entities exempted from the annual financial statements as of 31 December 2011.
  - d) There have been no changes in the method of consolidation since the previous annual financial statements.
- 10) "Other comprehensive income for the period, net of tax" of the Group, in the current period ended 31 December 2011, is comprised of €1.538.4 million relating to the movement of available for sale investments reserve, €(742.8) million relating to currency translation differences, €(9.4) million relating to tax from net investment hedge and €6.1 million relating to net cash flow hedge. The corresponding amounts for the Bank (excluding net investment hedge and net cash flow hedge amounts which are NIL) are €1.309,6 million and €0,7 million.
- 11) As of 31 December 2011, the Group held 62.972 rights on treasury shares with acquisition cost of €0,1 million, while the Bank did not hold any treasury shares.

## 12) Other events:

- (a) On 31 January 2012, the Bank acquired 10,2% of Banca Romaneasca from European Bank for Reconstruction and Development (EBRD) through put and call arrangements as provided for in the 2005 shareholders agreement, between the Bank and EBRD. The total consideration paid amounted to €26,1 million. Details related to the events after the reporting period are included in Note 49 of the annual financial statements as of 31 December 2011.
- (b) On 22 December 2011, the Extraordinary General Meeting of the Bank's Shareholders approved a) the share capital increase by €1.000 million through the issue of additional 200.000.000 Redeemable Preference Shares at a nominal value of €5.0 each with the cancellation of the pre-emptive rights of the existing shareholders in favour of the Greek State and b) the revocation of the decision of the Extraordinary General Meeting of the Bank's Shareholders held on 26 November 2010 regarding the repurchase by the Bank of the 70.000.000 Redeemable Preference Shares in favour of the Greek State.

- (c) During 2011, the Bank proceeded in the purchase of an additional portion of the outstanding preferred securities of an aggregate nominal amount of €19,0 million of series A, B and D, GBP 11,1 million of series E and USD 1,9 million of series C.
- (d) On 23 June 2011, the annual Ordinary General Meeting of the Bank's shareholders approved the non-distribution of dividends to any class of shares.
- 13) In 2011, the Group and the Bank reclassified bonds from "Available-for-sale investment securities" to "Held-to-maturity investment securities".

Details related to reclassifications are included in Note 51 of the annual financial statements as of 31 December 2011.

Athens, 20 April 2012

THE CHAIRMAN

THE CHIEF EXECUTIVE OFFICER

THE DEPUTY CHIEF EXECUTIVE OFFICER

THE CHIEF FINANCIAL OFFICER

VASSILIOS T. RAPANOS APOSTOLOS S. TAMVAKAKIS ANTHIMOS C. THOMOPOULOS CHARALAMPOS G. MAZARAKIS

# **AUDIT COMMITTEE REPORT TO SHAREHOLDERS**

The Audit Committee of NBG is composed of the following five members:

Chairman: Petros Sabatacakis,

Economist, Banker

Vice-Chairman: Alexandra Papalexopoulou,

Economist, Member of the Board of Titan Cement SA

Members: Stefanos Vavalidis,

Former member of the Board of the EBRD

George Zanias,

Professor, Economist, Chairman of the Council of Economic Advisors

of the Finance Ministry (he resigned in May 2012)

Marily Frangista,

Managing Director, Franco Compania Naviera SA

In 2011, the Committee was assisted in its work by Stefanos Pantzopoulos and Konstantinos Kotsilinis. Since February 2012, the Committee has been assisted by Ioannis Christodoulidis and Konstantinos Kotsilinis.

In 2011, the Committee convened ten times, chaired by Petros Sabatacakis (who also advises on issues related to the US Securities & Exchange Commission), vice-chaired by Alexandra Papalexopoulou, and attended by the members Stefanos Vavalidis, Marily Frangista and George Zanias.

The Committee is responsible for supervising the Group Internal Audit Division, monitoring its work and evaluating the Division's annual report on the system of internal controls, which is submitted to the Board for approval and thereafter filed with the Bank of Greece.

The Audit Committee held regular meetings with the certified auditors of the Bank so as to be duly updated on the preparation and progress of the audit schedule, and on the handling of significant accounting and auditing issues.

The Committee also met regularly with the Bank's Financial Division to ensure that the procedures for drawing up the annual financial report of the Bank and the Group are adequate and effective.

The preparation of the financial statements according to International Financial Reporting Standards (IFRS) presupposes that Management applies estimates and assumptions which influence both the balance of assets and

liabilities as well as the income and expenses recorded in the financial statements of the Bank and the Group. The Group's Management considers that the estimates and assumptions applied in the preparation of the consolidated financial statements adequately reflect the facts and conditions prevailing as at 31 December 2011.

The most important cases where the Group applies estimates and assumptions in the implementation of accounting principles are the following:

- Fair value of financial instruments:
- Recognition and measurement of intangible assets acquired through business combinations;
- Control of goodwill impairment in the consolidated financial statements, and in investments in subsidiaries, associates and joint ventures in the non-consolidated financial statements;
- Provisions for loan losses and claims against customers;
- Insurance-related reserves;
- Net periodic benefit cost;
- Impairment of Greek government bonds and loans guaranteed by the Hellenic Republic due to the PSI;
- Impairment of investment securities;
- Consolidation of SPEs (Special Purpose Entities);
- Income taxes.

The escalation of the economic crisis in Greece and the completion of the PSI generated unprecedented challenges for the measurement of financial data held by the Bank and the Group, particularly loans and Greek government bonds. As a result, the Bank and the Group recorded significant impairment losses in the 2011 results and, accordingly, the Group's equity was negative.

The accounting principles and policies implemented in the preparation of the interim and 2011 financial statements comply with IFRS as adopted by the European Union and approved by certified auditors. However, in view of the critical economic conditions and the political uncertainty in Greece, estimates regarding bonds, loans and, in general, the Group's exposure to the Hellenic Republic may undergo modification and the actual results in the future may

differ from those reported and affect the management's assessment of the going concern.

As every year, the US Securities & Exchange Commission reviewed the 2011 financial statements of the Bank, both those prepared according to US GAAP and those prepared in accordance with IFRS (submitted for information purposes). In the context of its duties, the Audit Committee monitors the relevant correspondence between the Bank and the SEC, which however has not been completed.

Furthermore, the Bank's Financial Division and internal and external auditors assured the Audit Committee that their controls did not reveal any significant issue that could materially affect the financial statements and smooth operation of the Bank.

The relevant meetings of the internal and external auditors with the Committee took place without the presence of Board members.

The Committee reviewed all related parameters and submitted to the Board of Directors its recommendation for the appointment of the auditing firm for 2012, which will then be submitted to the AGM.

The Committee monitors the work of the Group Regulatory Compliance Division, collaborates on a regular basis with relevant officers, evaluates the Division's annual reports, and submits these reports to the Bank's Board for approval for filing with the Bank of Greece.

Throughout the year, the Committee monitored the implementation of procedures for receiving confidential complaints submitted by staff or third parties regarding accounting and auditing issues.

The Committee held meetings with various General Managers of the Bank on matters relating to its work, placing particular emphasis on the financial and regulatory compliance functions. The Chairman of the Committee, Petros Sabatacakis, is also a member of the Board Risk Management Committee.

Throughout the year, the Committee devoted considerable time to communicating with the chairmen of the audit committees of the Group's subsidiary banks and larger affiliated companies so as to foster a stronger Group spirit and common approach to auditing issues.

The Committee submitted quarterly progress reports to the Board of Directors. It also presented its annual report on its activities for 2011, the schedule of its operations for 2012, and summaries of the quarterly reports prepared by the Group Internal Audit Division. In addition, the Committee reviewed and reported on the progress of earlier significant recommendations which it made.

The Committee's collaboration with the Chairman of the Board, Management and officers of the Bank and the Group, and the certified auditors was entirely satisfactory and problem free. The Bank's Management provided the Committee with all the information and data it requested, as well as the means to ensure that it could carry out its work effectively.

Petros Sabatacakis

Chairman of the Audit Committee

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# INVITATION TO THE BANK'S ANNUAL GENERAL MEETING OF SHAREHOLDERS

# TO BE HELD ON THURSDAY, 28 JUNE 2012, AT 12:00 HOURS

Pursuant to the provisions of Companies Act 2190/1920 (the Companies Act) and of Law 2396/96 on dematerialized shares, and to the Bank's Articles of Association (Article 11) and Board of Directors' resolution dated 30 May 2012, the Shareholders of National Bank of Greece SA, whose registered office is at Aiolou 86, Athens, Greece, are invited to the Bank's AGM to be held at 12:00 hours on Thursday, 28 June 2012 at Aiolou 93 (Megaro Mela), Athens.

# **AGENDA**

- 1. Submission for approval of the Reports of the Board of Directors and the Auditors on the Annual Financial Statements for the financial year 2011 (i.e. 1 January 31 December 2011).
- 2. Submission for approval of the Annual Financial Statements of the Bank for the financial year 2011 (i.e. 1 January 31 December 2011).
- 3. Discharge of the members of the Board of Directors and the Auditors of National Bank of Greece from any liability for indemnity regarding the Annual Financial Statements and management for the year 2011 (i.e. 1 January 31 December 2011).
- 4. Approval of the remuneration of the Board of Directors of the Bank for the financial year 2011 (pursuant to Article 24, par. 2 of the Companies Act). Determination of the remuneration of the Chairman of the Board, the CEO, the Deputy CEOs and non-executive Directors through to the AGM of 2013. Approval, for the financial year 2011, of the remuneration of the Bank's Directors in their capacity as members of the Bank's Audit, Corporate Governance & Nominations, Human Resources & Remuneration, Risk Management, and Strategy Committees, and determination of their remuneration through to the AGM of 2013.
- 5. Granting of permission for Directors, General Managers, Assistant General Managers and Managers to participate on the Board of Directors or in the management of NBG Group companies pursuing similar or related business goals (as per Article 23, par. 1 of the Companies Act and Article 30, par. 1 of the Bank's Articles of Association).
- 6. Election of members to the Audit Committee.
- 7. Election of regular and substitute Certified Auditors for the Bank's financial statements and the Group's consolidated financial statements for the year 2012, and determination of their remuneration.
- 8. Various announcements and approvals.

In accordance with articles 26.2b and 28a of the Companies Act, as amended and supplemented by, respectively, articles 3 and 5 of Law 3884/2010, the Bank informs shareholders of the following:

### ENTITLEMENT TO PARTICIPATE IN THE GENERAL MEETING

Any person appearing as a shareholder (i.e. holder of ordinary registered shares of the Bank) in the registry of the Dematerialized Securities System [formerly the Central Securities Depository] managed by Hellenic Exchanges SA ("HELEX"), in which the shares of the Bank are recorded, is entitled to participate in the General Meeting, according to the specific provisions outlined herein below. Each ordinary share is entitled to one vote. Under article 1 of Law 3723/2008 the Bank's preference shares entitle the representative of their holder (the Hellenic Republic) to attend the Meeting. Proof of shareholder status should be provided by presenting relevant certification from HELEX at the latest by the third day prior to the Meeting. Shareholders who are legal entities must also, by the same deadline, file, pursuant to the law, their legalisation documents, unless these documents have already been filed with the Bank, in which case it is sufficient to state where they have been filed in the relevant proxy form. Alternatively, proof of shareholder status can be provided through direct electronic link-up of the Bank with the records of the Dematerialized Securities System.

Shareholder status must exist on 23 June 2012 (Record Date), i.e. at the start of the 5th day prior to the date of the General Meeting of 28 June 2012, and the relevant written certification or the electronic verification of shareholder status must have been received by the Bank by 25 June 2012 at the latest, i.e. on the 3rd day prior to the date of the General Meeting. Only those who have shareholder status on the said Record Date are considered to be entitled to participate and vote in the General Meeting. Shareholders who do not comply with the provisions of article 28a of the Companies Act may participate in the General Meeting only after the Meeting has authorized them to do so.

To exercise the said rights, it is not necessary to block the shares or follow any other similar process that may restrict the ability to sell and transfer shares in the period between the Record Date and the General Meeting.

# PROCEDURE FOR VOTING BY PROXY

The shareholder may participate in the General Meeting and may vote either in person or by proxy. Each shareholder may appoint up to 3 proxy holders. Legal entities may participate in the General Meeting by appointing up to 3 natural persons as proxy holders.

However, if the shareholder owns shares in the Bank that are held in more than one Investor Securities Account, such limitation shall not prevent the shareholder from appointing, in respect of the General Meeting, separate proxy holders for the shares appearing in each Account.

A proxy holder holding proxies from several shareholders may cast votes differently for each shareholder. Before the General Meeting commences, the proxy holder must disclose to the Bank any particular facts that may be of relevance for shareholders in assessing the risk that the proxy holder may pursue interests other than those of the shareholder. Within the meaning intended in this paragraph, a conflict of interest may arise in particular when the proxy holder:

(i) is a controlling shareholder of the Bank or is another entity controlled by such shareholder;

- (ii) is a member of the board of directors or in general the management of the Bank, or of a controlling shareholder or an entity controlled by such shareholder;
- (iii) is an employee or an auditor of the Bank, or of a controlling shareholder or an entity controlled by such shareholder;
- (iv) is a spouse or close relative (1st degree) of a natural person referred to in (i) to (iii) hereinabove.

The appointment and revocation of appointment of a proxy holder shall be made in writing and shall be notified to the Bank in writing at least 3 days prior to the date of the General Meeting.

The Bank shall make available the form to be used for appointing a proxy holder on its website (www.nbg.gr). The said form, filled in and signed by the shareholder, must be filed with the Bank's Shareholder Services (ground floor, 93 Aiolou St., Athens) or the Head Branch or any branch of the Bank's network, or sent by fax to +30 2103343404, 2103343406 and 2103343410 at least 3 days prior to the date of the General Meeting. Shareholders should confirm that the appointment-of-proxy form has been successfully received by the Bank by calling +30 2103343415, 2103343419, 2103343421, 2103343417 or 2103343411.

The Articles of the Bank do not provide for participation in the General Meeting by electronic means without the Shareholder attending the Meeting in person at the place where it is held. Similarly, the Articles do not provide for participation in voting by distance voting.

#### MINORITY RIGHTS

- (a) If shareholders representing 1/20 of the paid-up share capital of the Bank so request, the Bank's board of directors is obliged to include additional items in the Agenda of the General Meeting, provided that the said request is communicated to the board by 13 June 2012, i.e. at least 15 days prior to the General Meeting.
  - The said request should be accompanied by justification or a draft resolution to be approved by the General Meeting and on 15 June 2012, i.e. 13 days prior to the General Meeting, the revised agenda should be disclosed in the same manner as the previous agenda, and at the same time made available to shareholders through the Bank's website, along with the justification or draft resolution tabled by the shareholders, in accordance with the provisions of article 27.3 of the Companies Act.
- (b) If shareholders representing 1/20 of the paid-up share capital of the Bank so request, the Board of Directors shall, in accordance with the provisions of article 27.3 of the Companies Act, make available to shareholders by 22 June 2012 at the latest, i.e. at least 6 days prior to the General Meeting, any draft resolutions on the items included in the initial or revised agenda, provided that the said request is communicated to the Board by 21 June 2012, i.e. at least 7 days prior to the General Meeting.
- (c) If any shareholder so requests, and provided that the said request is filed with the Bank by 23 June 2012, i.e. at

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least 5 full days before the General Meeting, the board of directors is obliged to provide the General Meeting with information regarding the affairs of the Bank, insofar as such information is relevant to a proper assessment of the items on the agenda. The Board of Directors may decline to provide such information citing sufficient material grounds, and this should be recorded in the minutes. The Board of Directors may provide a single answer to shareholders' requests that are of similar content. The obligation to provide information does not apply in the event that such information is already available through the Bank's website, particularly in the case of frequently asked questions.

(d) If shareholders representing 1/5 of the paid-up capital of the Bank so request, and provided that the said request is filed with the Bank by 23 June 2012, i.e. at least 5 full days prior to the General Meeting, the Board of Directors is obliged to provide the General Meeting with information on the course of the business affairs and financial status of the Bank. The Board of Directors may decline to provide such information citing sufficient material grounds, and this should be recorded in the minutes.

In all the aforesaid cases the shareholders making requests are required to prove their shareholder status as well as the number of shares they hold as at the time of exercising the relevant right. A certificate to this effect from HELEX or verification of shareholder status through direct electronic link-up between the records held by HELEX and the Bank may also serve as such proof.

## AVAILABLE DOCUMENTS AND INFORMATION

The information required under article 27.3 of the Companies Act, including the invitation to the General Meeting, the proxy appointment form and the draft resolutions on the items of the agenda shall be made available in electronic form on the website of the Bank at www.nbg.gr. Hard copies of the full text of the draft resolutions and any documents specified under article 27.3(c) and (d) of the Companies Act can be obtained from the Bank's Shareholder Services (ground floor of the Megaro Mela, Aiolou 93, Athens).

Athens, 6 June 2012 By order of the Board of Directors

The Chairman

Vassilios Rapanos

# **CONTACT INFORMATION**

# **NATIONAL BANK OF GREECE SA**

Eolou 86, 102 32 Athens Tel: 210 3341000 Fax: 210 4806510 telex: 021/4931-38 NBG GR http://www.nbg.gr

	Telephone	Fax	Website
CUSTOMER SERVICE:			
In Greece (round the clock)	181818		www.nbg.gr
Overseas	0030210 4848484	210 4806865	
SHAREHOLDER SERVICES:			
BoD Secretariat and Shareholder Services	210 3343411-2	210 3343404	www.nbg.gr
Domestic shareholders	210 3343417	210 3343406	
	210 3343416	210 3343443	
Overseas shareholders	210 3343421	210 3343410	
Overseas stock-exchange relations	210 3343424	210 3343424	
SPECIAL BANKING SERVICES:			
Investor Relations	210 3342310	210 3341670	www.nbg.gr
Treasury Division	210 3328803	210 3328850	
Dealing Room	210 3328813-7	210 3328820	
International Division	210 3328611	210 3328630	
	210 3328239	210 3328630	
Relations with Financial Institutions	210 3328206	210 3328215	
Payment Systems	210 3574041	210 3579601	
Private Banking	210 3664100	210 3664230	
Business Credit Division	210 5181231	210 5181230	
Small Business Loans Division	210 7727639	210 7727659	
Corporate Finance Division	210 5180214	210 5180220	
Structured & International Finance Division	210 5181007	210 5180245	
Mortgage Lending Division	210 3695201	210 3695220	
Consumer Credit Division	210 9306201	210 9306233	
Card Issuing & Acquiring Division	210 9503801	210 9522057	
Shipping Finance Division	210 4144101	210 4144120	
Shipping Branch	210 4144001	210 4144005	
INVESTMENT BANKING SERVICES: Investment Banking Division	210 3349600	210 3349688	www.nbg.gr
Project Finance Division	210 5181381	210 534400	www.ribg.gi
STOCK BROKING SERVICES:			
National Securities Investment Services SA	210 7720000	210 7720001	www.nationalsec.gr
Customer services (landline calls)	801 11 77000		
Customer services (mobile calls)	210 7720100		
CUSTODIAN SERVICES:			
Domestic and Overseas Customers	210 9477901	210 9477910	www.nbg.gr
PRIVATE EQUITY SERVICES:			
NBG Private Equity Ltd (London)	004420 7661 5678	004420 7661 5667	www.nbgipe.com

	Telephone	Fax	Website
LEASING SERVICES:			
Ethniki Leasing SA	210 5158060-3	210 5158079	www.ethnolease.gr
FACTORING SERVICES:			
Ethniki Factors	210 5181088	210 5181090	www.nbgfactors.gr
MUTUAL FUNDS			
Ethniki Asset Management SA	210 9007400	210 9007499	www.nbgam.gr
INSURANCE SERVICES:			
Ethniki Hellenic General Insurance Co. SA	210 9099000	210 9099111	www.ethniki-asfalistiki.g
Suggestions and complaints service	210 9099777		
REAL ESTATE AND STORAGE SERVICES:			
Property Management	210 3347801	210 3347880	www.nbg.gr
NBG Pangaea REIC	210 3340011	210 3340160	
Ethniki Kefalaiou SA	210 3340850	210 3217905	www.ethnikikefaleou.gr
PEAGAE General Warehouses SA	210 5500180	210 5500181	
EKTENEPOL Urban Planning SA	210 3240231	210 3340240	
COMPUTING SERVICES:			
Ethnodata SA	210 3578700	210 3578715	www.ethnodata.gr
COMPLAINT DESK (8:00-16:00 Monday-Friday)			
Landline calls in Greece:	800 11 88988		www.nbg.gr
Mobile and international calls	0030 210 4806100		
INTERNATIONAL OFFICES:			
EGYPT			
Cairo	(00202) 33370476	3370579	www.nbg,gr
ALBANIA			
Tirana	(0035542) 280000	280002	
AUSTRALIA			
Melbourne (Representative Office)	(00613) 96002172		
Sydney (Representative Office)	(00612) 92331206		
CYPRUS			
Nicosia	(00357) 22840185		
UNITED KINGDOM			
London	(0044207) 6263222	6260903	

	Telephone	Fax	Website
INTERNATIONAL SUBSIDIARIES:			
BULGARIA			
United Bulgarian Bank AD (UBB), Sofia	(003592) 8112800	9880822	www.ubb.bg
Interlease EAD, Sofia	(003592) 9718282	9718172	www.interlease.bg
CYPRUS			
National Bank of Greece (Cyprus) LTD	(00357) 22840000	22840010	www.nbg.com.cy
MALTA			
NBG (Malta) Ltd	(00356) 21318969	2132 0991	www.nbg.com.mt
UNITED KINGDOM			
NBG International Ltd	(0044207) 6615648	6615655	
NBGI Private Equity Ltd	(0044207) 6615678	6615667	www.nbgipe.com
NBGI Private Equity SEE	(0044207) 6615678	6615655	
SOUTH AFRICA			
The South African Bank of Athens Ltd	(002711) 6344300	8381001	www.bankofathens.co.za
FYROM			
Stopanska Banka AD Skopje	(003892) 3295295	3114503	www.stb.com.mk
ROMANIA			
Banca Romaneasca SA	(004021) 3059000	3059191	www.banca-romaneasca.ro
Garanta SA	(004021) 3079971	3079970	www.garanta.ro
NBG Leasing IFN SA	(004021) 4091000	4091009	www.eurialleasing.ro
SERBIA			
Vojvodjanska Banka AD Novisad	(0038121) 4886600	6624859	www.voban.co.rs
NBG Leasing D00 Beograd	(0038111) 2287982	2287984	www.nbgleasing.rs
TURKEY			
Finansbank SA	(0090212) 3185000	3185850	www.finansbank.com.tr
Finans Leasing AS	(0090212) 3491111	3506000	www.finansleasing.com.tr
Finans Portfolio Management AS	(0090212) 3367171	2822254	www.finansportfoy.com
Finans Invest	(0090212) 2821700	2822250	www.finansonline.com
IB Tech	(0090262) 6791500	6791519	www.ibtech.com.tr
Finans Factoring AS	(0090212) 3713800	3713898	www.finansfaktoring.com.tr
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