



ALPHA BANK

# CONDENSED INTERIM CONSOLIDATED FINANCIAL STATEMENTS AS AT 30.9.2019

(In accordance with International Accounting Standard 34)



Athens, 19 November 2019



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## Interim Consolidated Income Statement

(Amounts in thousands of Euro)

	Note	FROM 1 JANUARY TO		FROM 1 JULY TO	
		30.9.2019	30.9.2018*	30.9.2019	30.9.2018*
Interest and similar income		1,530,972	1,720,970	498,039	554,665
Interest expense and similar charges		(370,835)	(391,531)	(114,860)	(128,034)
Net interest income	2	1,160,137	1,329,439	383,179	426,631
Fee and commission income		321,113	305,312	129,593	107,581
Commission expense		(74,119)	(60,520)	(33,996)	(29,487)
Net fee and commission income	3	246,994	244,792	95,597	78,094
Dividend income		671	758	105	132
Gains less losses on derecognition of financial assets measured at amortised cost		623	9,379	(476)	(2,840)
Gains less losses on financial transactions and impairments on Group companies	4	276,780	388,973	80,349	137,593
Other income		29,351	26,215	6,936	8,010
<b>Total other income</b>		<b>307,425</b>	<b>425,325</b>	<b>86,914</b>	<b>142,895</b>
<b>Total income</b>		<b>1,714,556</b>	<b>1,999,556</b>	<b>565,690</b>	<b>647,620</b>
Staff costs	5	(341,910)	(349,815)	(112,278)	(115,742)
General administrative expenses	6	(347,043)	(385,170)	(117,898)	(131,651)
Depreciation and amortization		(107,248)	(75,575)	(35,336)	(25,825)
Other expenses		(27,413)	(12,142)	(14,442)	(1,199)
<b>Total expenses before impairment losses and provisions to cover credit risk</b>		<b>(823,614)</b>	<b>(822,702)</b>	<b>(279,954)</b>	<b>(274,417)</b>
Impairment losses and provisions to cover credit risk	7, 8	(739,494)	(1,013,113)	(264,550)	(313,613)
Share of profit / (loss) of associates and joint ventures		(11,746)	93	(570)	716
<b>Profit / (Loss) before income tax</b>		<b>139,702</b>	<b>163,834</b>	<b>20,616</b>	<b>60,306</b>
Income tax	9	(48,173)	(110,114)	(15,949)	(19,160)
<b>Profit / (Loss) after income tax</b>		<b>91,529</b>	<b>53,720</b>	<b>4,667</b>	<b>41,146</b>
<b>Profit / (Loss) attributable to:</b>					
<b>Equity owners of the Bank</b>		<b>91,633</b>	<b>53,819</b>	<b>4,806</b>	<b>41,165</b>
Non-controlling interests		(104)	(99)	(139)	(19)
<b>Earnings / (Losses) per share:</b>					
Basic and diluted (€ per share)	10	0.06	0.03	0.003	0.03

The Group applied I.F.R.S. 16 retrospectively, without restating the comparative information in accordance with the transitional requirements of the Standard, with the cumulative effect of initially applying the standard, recognized directly in Equity as at 1.1.2019 and therefore the comparative period figures are not comparable.

\* The Interim Consolidated Income Statement of the comparative period has been restated, as described in detail in note 32.



## Interim Consolidated Balance Sheet

(Amounts in thousands of Euro)

	Note	30.9.2019	31.12.2018
<b>Assets</b>			
Cash and balances with central banks		893,251	1,928,205
Due from banks	11	3,550,433	2,500,492
Trading securities	13	31,044	8,339
Derivative financial assets		1,190,352	725,173
Loans and advances to customers	12	39,451,005	40,228,319
Investment securities	13		
- Measured at fair value through other comprehensive income		8,009,223	6,961,822
- Measured at fair value through profit or loss		47,719	42,794
- Measured at amortized cost		387,446	
Investments in associates and joint ventures		13,983	23,194
Investment property	14	510,368	493,161
Property, plant and equipment	15	878,256	734,663
Goodwill and other intangible assets	16	477,401	434,093
Deferred tax assets		5,130,449	5,290,763
Other assets		1,484,675	1,363,685
		<b>62,055,605</b>	<b>60,734,703</b>
Assets held for sale	30	669,208	272,037
<b>Total Assets</b>		<b>62,724,813</b>	<b>61,006,740</b>
<b>Liabilities</b>			
Due to banks	17	9,868,735	10,456,359
Derivative financial liabilities		1,702,736	1,147,895
Due to customers		39,612,370	38,731,835
Debt securities in issue and other borrowed funds	18	885,620	943,334
Liabilities for current income tax and other taxes		18,966	41,272
Deferred tax liabilities		33,682	18,681
Employee defined benefit obligations		86,860	86,744
Other liabilities		1,327,007	908,515
Provisions	19	617,933	527,386
		<b>54,153,909</b>	<b>52,862,021</b>
Liabilities related to assets held for sale	30	-	1,603
<b>Total Liabilities</b>		<b>54,153,909</b>	<b>52,863,624</b>
<b>EQUITY</b>			
<b>Equity attributable to equity owners of the Bank</b>			
Share capital	20	463,110	463,110
Share premium		10,801,029	10,801,029
Reserves		831,244	460,025
Amounts recognized directly in equity related to assets held for sale	30	(122)	(122)
Retained earnings	20	(3,568,197)	(3,624,847)
		<b>8,527,064</b>	<b>8,099,195</b>
<b>Non-controlling interests</b>		<b>28,733</b>	<b>28,814</b>
<b>Hybrid securities</b>	21	<b>15,107</b>	<b>15,107</b>
<b>Total Equity</b>		<b>8,570,904</b>	<b>8,143,116</b>
<b>Total Liabilities and Equity</b>		<b>62,724,813</b>	<b>61,006,740</b>

The Group applied I.F.R.S. 16 retrospectively, without restating the comparative information in accordance with the transitional requirements of the Standard, with the cumulative effect of initially applying the standard, recognized directly in Equity as at 1.1.2019 and therefore the comparative period figures are not comparable.



## Interim Consolidated Statement of Comprehensive Income

(Amounts in thousands of Euro)

	Note	FROM 1 JANUARY TO		FROM 1 JULY TO	
		30.9.2019	30.9.2018*	30.9.2019	30.9.2018*
<b>Profit / (Loss), after income tax, recognized in the Income Statement</b>		<b>91,529</b>	<b>53,720</b>	<b>4,667</b>	<b>41,146</b>
<b>Other comprehensive income</b>					
<b>Amounts that may be reclassified to the Income Statement</b>					
Net change in securities' reserve measured at fair value through other comprehensive income		657,417	(486,368)	239,813	(189,851)
Net change in cash flow hedge reserve		(135,572)	15,281	(52,184)	16,734
Exchange differences on translating and hedging the net investment in foreign operations		(198)	9,494	(34)	(432)
Change in other comprehensive income share of associates and joint ventures			(149)		(149)
Income tax	9	(151,847)	134,095	(55,411)	50,417
<b>Amounts that may be reclassified in the Income Statement</b>		<b>369,800</b>	<b>(327,647)</b>	<b>132,184</b>	<b>(123,281)</b>
<b>Amounts that will not be reclassified in the Income Statement</b>					
Net change in actuarial gains / (losses) of defined benefit obligations			123		
Gains / (Losses) from shares measured at fair value through other comprehensive income		(8,607)	(80)	908	(2,362)
Income tax	9	3,018	(580)	(234)	271
<b>Amounts that will not be reclassified in the Income Statement</b>		<b>(5,589)</b>	<b>(537)</b>	<b>674</b>	<b>(2,091)</b>
<b>Total of other comprehensive income recognized directly in equity, after income tax</b>		<b>364,211</b>	<b>(328,184)</b>	<b>132,858</b>	<b>(125,372)</b>
<b>Total comprehensive income for the period, after income tax</b>		<b>455,740</b>	<b>(274,464)</b>	<b>137,525</b>	<b>(84,226)</b>
<b>Total comprehensive income for the period attributable to:</b>					
<b>Equity owners of the Bank</b>		<b>455,847</b>	<b>(274,365)</b>	<b>137,664</b>	<b>(84,207)</b>
Non controlling interests		(107)	(99)	(139)	(19)

\* The Interim Consolidated Statement of Comprehensive Income of the comparative period has been restated, as described in detail in note 32.



## Interim Consolidated Statement of Changes in Equity

(Amounts in thousands of Euro)

	Share capital	Share premium	Reserves	Retained earnings	Total	Non-controlling interests	Hybrid securities	Total*
<b>Balance 1.1.2018</b>	<b>463,110</b>	<b>10,801,029</b>	<b>846,010</b>	<b>(3,669,376)</b>	<b>8,440,773</b>	<b>28,534</b>	<b>15,107</b>	<b>8,484,414</b>
<b>Changes for the period 1.1 - 30.9.2018</b>								
Profit / (Loss) for the period, after income tax				53,819	53,819	(99)		53,720
Other comprehensive income after income tax			(327,647)	(537)	(328,184)			(328,184)
<b>Total comprehensive income for the period, after income tax</b>	<b>-</b>	<b>-</b>	<b>(327,647)</b>	<b>53,282</b>	<b>(274,365)</b>	<b>(99)</b>	<b>-</b>	<b>(274,464)</b>
(Purchases) / Sales and change of ownership interests in subsidiaries				(198)	(198)	282		84
Appropriation of reserves			1,358	(1,358)	-			-
Other				(320)	(320)			(320)
<b>Balance 30.9.2018</b>	<b>463,110</b>	<b>10,801,029</b>	<b>519,721</b>	<b>(3,617,970)</b>	<b>8,165,890</b>	<b>28,717</b>	<b>15,107</b>	<b>8,209,714</b>
<b>Changes for the period 1.10 - 31.12.2018</b>								
Profit / (Loss) for the period, after income tax				(858)	(858)	97		(761)
Other comprehensive income after income tax			(61,345)	(5,113)	(66,458)	-		(66,458)
<b>Total comprehensive income for the period, after income tax</b>	<b>-</b>	<b>-</b>	<b>(61,345)</b>	<b>(5,971)</b>	<b>(67,316)</b>	<b>97</b>	<b>-</b>	<b>(67,219)</b>
Appropriation of reserves			1,527	(1,527)	-			-
Other				621	621			621
<b>Balance 31.12.2018</b>	<b>463,110</b>	<b>10,801,029</b>	<b>459,903</b>	<b>(3,624,847)</b>	<b>8,099,195</b>	<b>28,814</b>	<b>15,107</b>	<b>8,143,116</b>

\* The Interim Consolidated Statement of Changes in Equity of the comparative period has been restated, as described in detail in note 32.





(Amounts in thousands of Euro)

	Share capital	Share premium	Reserves	Retained earnings	Total	Non-controlling interests	Hybrid securities	Total
<b>Balance 31.12.2018</b>	<b>463,110</b>	<b>10,801,029</b>	<b>459,903</b>	<b>(3,624,847)</b>	<b>8,099,195</b>	<b>28,814</b>	<b>15,107</b>	<b>8,143,116</b>
Impact from the implementation of I.F.R.S. 16 on 1.1.2019				(27,930)	(27,930)			(27,930)
<b>Balance 1.1.2019</b>	<b>463,110</b>	<b>10,801,029</b>	<b>459,903</b>	<b>(3,652,777)</b>	<b>8,071,265</b>	<b>28,814</b>	<b>15,107</b>	<b>8,115,186</b>
<b>Changes for the period 1.1 - 30.9.2019</b>								
Profit / (Loss) for the period, after income tax				91,633	91,633	(104)		91,529
Other comprehensive income after income tax			369,803	(5,589)	364,214	(3)		364,211
<b>Total comprehensive income for the period, after income tax</b>	<b>-</b>	<b>-</b>	<b>369,803</b>	<b>86,044</b>	<b>455,847</b>	<b>(107)</b>	<b>-</b>	<b>455,740</b>
(Purchases) / Sales and change of ownership interests in subsidiaries and share capital increases of subsidiaries					-	26		26
Appropriation of reserves			1,416	(1,416)	-			-
Other				(48)	(48)			(48)
<b>Balance 30.9.2019</b>	<b>463,110</b>	<b>10,801,029</b>	<b>831,122</b>	<b>(3,568,197)</b>	<b>8,527,064</b>	<b>28,733</b>	<b>15,107</b>	<b>8,570,904</b>

The Group applied I.F.R.S. 16 retrospectively, without restating the comparative information in accordance with the transitional requirements of the Standard, with the cumulative effect of initially applying the standard, recognized directly in Equity as at 1.1.2019 and therefore the comparative period figures are not comparable.



## Interim Consolidated Statement of Cash Flows

(Amounts in thousands of Euro)

	Note	FROM 1 JANUARY TO 30.9.2019	30.9.2018*
<b>Cash flows from operating activities</b>			
Profits before income tax		139,702	163,834
<b>Adjustments for profits before income tax for:</b>			
Depreciation / Impairment / Write-offs of fixed assets		64,288	38,995
Amortization / Impairment / Write-offs of intangible assets		47,242	45,433
Impairment losses on financial assets and other provisions		787,767	1,035,743
Gains less losses on derecognition of financial assets measured at amortised cost		(623)	(18,426)
Valuation of financial assets measured at fair value through profit or loss		18,749	76,256
(Gains) / Losses from investing activities		(375,621)	(525,336)
(Gains) / Losses from financing activities		37,632	31,673
Share of (profit) / loss of associates and joint ventures		11,746	(93)
Other adjustments			(9,640)
		<b>730,882</b>	<b>838,439</b>
<b>Net (increase) / decrease in assets relating to operating activities</b>			
Due from banks		(412,939)	(149,550)
Trading securities and derivative financial instruments		(81,537)	(19,635)
Loans and advances to customers		(462,957)	(427,080)
Other assets		(67,256)	173,385
<b>Net increase / (decrease) in liabilities relating to operating activities:</b>			
Due to banks		(587,624)	(3,416,541)
Due to customers		875,684	3,741,870
Other liabilities		199,927	109,594
<b>Net cash flows from operating activities before taxes</b>		<b>194,180</b>	<b>850,482</b>
Income taxes and other taxes paid		(32,405)	(32,221)
<b>Net cash flows from operating activities</b>		<b>161,775</b>	<b>818,261</b>
<b>Cash flows from investing activities</b>			
Investments in associates and joint ventures		(2,500)	11,513
Amounts received from disposal of subsidiaries		117,166	
Dividends received		671	758
Acquisitions of fixed and intangible assets	14, 15, 16	(160,311)	(111,685)
Disposals of fixed and intangible assets		53,482	29,950
Interest received on investment portfolio securities		152,896	71,792
Purchases of Greek State Treasury Bills		(388,958)	(1,763,900)
Disposals / Maturity of Greek State Treasury Bills		902,294	2,119,043
Purchases of investment securities (excluding Greek State Treasury Bills)		(4,817,322)	(3,371,946)
Disposals / Maturity of investment securities (excluding Greek State Treasury Bills)		3,731,959	2,973,486
<b>Net cash flows from investing activities</b>		<b>(410,623)</b>	<b>(40,989)</b>
<b>Cash flows from financing activities</b>			
Receipts of debt securities in issue and other borrowed funds		196,906	512,240
Repayments of debt securities in issue and other borrowed funds		(257,651)	(239,882)
Interests paid for debt securities in issue and other borrowed funds		(25,525)	(14,001)
Lease payments of assets		(21,233)	-
<b>Net cash flows from financing activities</b>		<b>(107,503)</b>	<b>258,357</b>
Effect of exchange rate differences on cash and cash equivalents		8,228	7,659
<b>Net increase / (decrease) in cash flows</b>		<b>(348,123)</b>	<b>1,043,288</b>
<b>Cash and cash equivalents at the beginning of the period</b>		<b>2,247,144</b>	<b>1,260,833</b>
<b>Cash and cash equivalents at the end of the period</b>		<b>1,899,021</b>	<b>2,304,121</b>

\* Several figures of the previous period have been restated in order to be comparable.



## Notes to the Condensed Interim Consolidated Financial Statements

### GENERAL INFORMATION

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

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

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

The tenure of the Board of Directors which was elected by the Ordinary General Meeting of Shareholders on 29 June 2018 expires at the Ordinary Meeting of Shareholders in 2022.

The Board of Directors on 30 September 2019 consists of:

#### CHAIRMAN (Non Executive Member)

Vasileios T. Rapanos

#### EXECUTIVE MEMBERS

##### CHIEF EXECUTIVE OFFICER

Vassilios E. Psaltis

##### DEPUTY CHIEF EXECUTIVE OFFICERS

Spyros N. Filaretos

Artemios Ch. Theodoridis

George C. Aronis

#### NON-EXECUTIVE MEMBERS

Efthimios O. Vidalis \*/\*\*/\*\*\*\*

Demetrios P. Mantzounis

#### NON-EXECUTIVE INDEPENDENT MEMBERS

Jean L. Cheval \*/\*\*/\*\*\*\*

Carolyn Adele G. Dittmeier \*/\*\*

Richard R. Gildea \*\*/\*\*\*\*

Shahzad A. Shahbaz \*\*\*\*

Jan Oscar A. Vanhevel \*/\*\*

#### NON-EXECUTIVE MEMBER

(in accordance with the requirements of Law 3864/2010)

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

#### SECRETARY

George P. Triantafyllides

The Executive Committee is the senior executive body of the Bank. The indicative main responsibilities include making decisions on the Bank and Group's business planning, evaluating the financial figures and progress of operations, approving the Business Plan, making decisions on investing in new companies, defining human resources policy and marketing.

\* Member of the Audit Committee

\*\* Member of the Remuneration Committee

\*\*\* Member of the Risk Management Committee

\*\*\*\* Member of Corporate Governance and Nominations Committee



The Executive Committee as of 30.9.2019 consists of the following Executive Members:

**CHIEF EXECUTIVE OFFICER**

Vassilios E. Psaltis

**DEPUTY CHIEF EXECUTIVE OFFICERS**

Spyros N. Filaretos - COO

Artemios Ch. Theodoridis - Non-Performing Loans and Treasury Management

George C. Aronis – Retail and Wholesale Banking

**GENERAL MANAGERS**

Spyridon A. Andronikakis - CRO

Lazaros A. Papagaryfallou - CFO

Sergiu-Bogdan A. Oprescu - International Network

Nikolaos V. Salakas - Chief Legal and Governance Officer

The Bank's shares are listed on the Athens Stock Exchange since 1925.

Apart from the Greek listing, the shares of the Bank are traded at the over-the counter market (OTC) in the United States, as American Depository Receipts (ADRs).

Total ordinary shares in issue as at 30 September 2019 were 1,543,699,381. On the Athens Stock Exchange 1,374,525,214 ordinary shares of the Bank are traded, while the Hellenic Financial Stability Fund ("HFSF") possesses the remaining 169,174,167 ordinary, registered, voting, paperless shares or percentage equal to 10.96% on the total of ordinary shares issued by the Bank. The exercise of the voting rights for the shares of HFSF is subject to restrictions according to the article 7a of Law 3864/2010.

During the nine month period of 2019, the average value per session of Alpha Bank shares traded was € 7,792.

The credit rating of the Bank performed by three international credit rating agencies is as follows:

- Moody's: Caa1 (5.3.2019)
- Fitch Ratings: CCC+ (8.10.2018)
- Standard & Poor's: B (8.11.2019)

**These financial statements have been approved by the Board of Directors on November 19, 2019.**



## ACCOUNTING POLICIES APPLIED

### 1.1 Basis of presentation

The Group has prepared the condensed interim financial statements as at 30.9.2019 in accordance with International Accounting Standard (IAS) 34, Interim Financial Reporting, as it has been adopted by the European Union.

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

- Securities held for trading
- Derivative financial instruments
- Loans measured at fair value through profit or loss
- Investment securities measured at fair value through other comprehensive income
- Investment securities measured at fair value through profit or loss

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

The accounting policies applied by the Group in preparing the condensed interim financial statements are the same as those stated in the published financial statements for the year ended on 31.12.2018, after taking into account the following new standards and amendments to standards as well as IFRIC 23 which were issued by the International Accounting Standards Board (IASB), adopted by the European Union and applied on 1.1.2019:

► **Amendment to International Financial Reporting Standard 9:** "Financial Instruments": Prepayment Features with Negative Compensation (Regulation 2018/498/22.3.2018)

On 12.10.2017 the International Accounting Standards Board issued an amendment to I.F.R.S. 9 that permits some prepayable financial assets with negative compensation features, that would otherwise been measured at fair value through profit or loss, to be measured at amortised cost or at fair value through other comprehensive income. The amendment to I.F.R.S. 9 clarifies that a financial asset passes the SPPI criterion regardless of the event or circumstance that cause the early termination of the contract and irrespective of which party pays or receives reasonable compensation for the early termination of the contract.

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

► **International Financial Reporting Standard 16:** "Leases" (Regulation 2017/1986/31.10.2017)

On 13.1.2016 the International Accounting Standards Board issued I.F.R.S. 16 "Leases" which supersedes:

- IAS 17 "Leases"
- IFRIC 4 "Determining whether an arrangement contains a lease"
- SIC 15 "Operating Leases – Incentives" and
- SIC 27 "Evaluating the substance of transactions involving the legal form of a lease".

The new standard significantly differentiates the accounting of leases for lessees while essentially maintaining the existing requirements of IAS 17 for the lessors. In particular, under the new requirements, the classification of leases as either operating or finance is eliminated. A lessee is required to recognize, for all leases with term of more than 12 months, the right-of-use asset as well as the corresponding obligation to pay the lease payments. The above treatment is not required when the asset is of low value.

At initial recognition, the right-of-use asset comprises the amount of the initial measurement of the lease liability, any initial



direct costs, any lease payments made before the commencement date as well as an estimate of dismantling costs. At initial recognition, the lease liability is equal to the present value of the lease payments that are not paid at that date.

### Estimated impact from I.F.R.S. 16 Implementation

The Group applied the standard to all the active, as at 1.1.2019, lease contracts, with the cumulative effect of initially applying the standard recognized directly in equity as at 1.1.2019 in accordance with the transitional requirements of the standard and did not restate comparative information. As a result, the figures of 2018 are not comparable.

The Group applied the practical expedient provided by I.F.R.S. 16 and did not reassess on initial application whether a contract is, or contains, a lease and applied the standard only to contracts that were identified as leases in accordance with IAS 17.

Additionally, the Group on transition has elected to make use of the following practical expedients provided by the standard:

- applied a single discount rate based on the lease term for all types of contracts,
- excluded initial direct costs from the measurement of the right-of-use asset,
- used hindsight to determine the lease term if the contract contained options to extend or terminate the lease and
- for the determination of the cost of the right-of-use asset it considered that right-of-use asset is equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments relating to that lease recognized in the balance sheet immediately before the date of initial application.

In addition, the Group has elected to make use of the practical expedient and did not apply the requirements of the standard to leases for which the lease term is less than 12 months (short term), as well to leases for which the underlying asset is of low value. It is noted that the Group has made assumptions for extension for leases expiring within 2019 that however are expected to be renewed. For the Bank in particular, in cases of renewals of existing leases, the new lease is set to three years and the Bank has a renewal option for a further three-year period under the same terms while retaining the right to terminate the lease during the second three-year period.

As a result of the application of I.F.R.S. 16, the Group recognised on 1.1.2019 right-of-use assets of € 179.8 million, net investment in the lease of € 10.5 million and lease liabilities of € 245.17 million. Impact on equity amounted to € 39 million before tax (€ 27.9 million after tax). The impact on CET amounted to 13 basis points. The main types of lease contracts include leases of property and offsite ATM's (notes 14 and 15).

Under the policy the Group elected to apply, right-of-use assets are recognized within Property, plant and equipment or Investment property while lease liabilities are recognized within Other liabilities.

The right-of-use asset is measured at cost less cumulative depreciation and impairment losses. The Group in order to discount remaining lease payments uses incremental borrowing rate (IBR) which is determined using as reference rate the secured funding rate of the parent company Alpha Bank, adjusted for different currencies and taking into consideration government yield curves, where applicable.

The Group has elected to make use of the practical expedient and will not recognize right-of-use assets and lease liabilities where the total lease term is less than 12 months or for leases for which the underlying asset is of low value when new (less than 5,000 euro). The payments for such leases are recognized in the Income Statement over the lease term.

It is noted that the standard did not have any impact on leases where the Group is a lessor with the exception of certain subleases for which the lease was characterized as finance and resulted in the recognition of a net investment in the lease of € 10.5 million.

### ► Amendments to International Accounting Standard 19: "Employee Benefits": Plan Amendment, Curtailment or Settlement (Regulation 2019/402/13.3.2019)

On 7.2.2018 the International Accounting Standards Board issued an amendment to IAS 19 with which it specified how companies determine pension expenses when changes to a defined benefit pension plan occur. In case that an amendment, curtailment or settlement takes place IAS 19 requires a company to remeasure its net defined benefit liability or asset.



The amendments to IAS 19 require specifically a company to use the updated assumptions from this remeasurement to determine current service cost and net interest for the remainder of the reporting period after the change to the plan. In addition, the amendment to IAS 19 clarifies the effect of a plan amendment, curtailment or settlement on the requirements regarding the asset ceiling.

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

► **Amendment to International Accounting Standard 28:** “Investments in Associates”: Long-term Interests in Associates and Joint Ventures (Regulation 2019/237/8.2.2019).

On 12.10.2017 the International Accounting Standards Board issued an amendment to IAS 28 to clarify that long-term interests in an associate or joint venture that form part of the net investment in the associate or joint venture —to which the equity method is not applied—should be accounted using I.F.R.S. 9, including its impairment requirements. In applying I.F.R.S. 9, the entity does not take account of any adjustments to the carrying amount of long-term interests that arise from applying IAS 28.

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

► **Improvements to International Accounting Standards:** – cycle 2015-2017 (Regulation 2019/412/14.3.2019)

As part of the annual improvements project, the International Accounting Standards Board issued, on 12.12.2017, non-urgent but necessary amendments to various standards.

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

► **IFRIC Interpretation 23:** “Uncertainty over Income Tax Treatments” (Regulation 2018/1595/23.10.2018)

On 7.6.2017 the International Accounting Standards Board issued IFRIC 23. The Interpretation clarifies application of recognition and measurement requirements in IAS 12 when there is uncertainty over income tax treatments. The Interpretation specifically clarifies the following:

- An entity shall determine whether to consider each uncertain tax treatment separately or together with one or more other uncertain tax treatments based on which approach better predicts the resolution of the uncertainty.
- The estimations for the examination by taxation authorities shall be based on the fact that a taxation authority will examine amounts it has a right to examine and have full knowledge of all related information when making those examinations.
- For the determination of taxable profit (tax loss), tax bases, unused tax losses, unused tax credits and tax rates, an entity shall consider whether it is probable that a taxation authority will accept an uncertain tax treatment.
- An entity shall reassess an estimate if the facts and circumstances change or as a result of new information.

The adoption of IFRIC 23 had no impact on the financial statements of the Group.

## 1.2 Estimates, decision making criteria and significant sources of uncertainty

The Group, in the context of applying accounting policies and preparing financial statements in accordance with the International Financial Reporting Standards, makes estimates and assumptions that affect the amounts that are recognized as income, expenses, assets or liabilities. The use of estimates and assumptions is an integral part of recognizing amounts in the financial statements that mostly relate to the following:

### Fair value of assets and liabilities

For assets and liabilities traded in active markets, the determination of their fair value is based on quoted, market prices. In all other cases the determination of fair value is based on valuation techniques that use observable market data to the greatest extent possible. In cases where there is no observable market data, the fair value is determined using data that are based on internal estimates and assumptions e.g. determination of expected cash flows, discount rates, prepayment probabilities or potential counterparty default.



### **Business Model Assessment**

Classification of financial assets is based on the assessment of business model and contractual cash flows. Business model, in particular, is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. This assessment requires judgement in which the following are taken into account: the way the performance of the business model is evaluated, the risks that affect the performance of the asset portfolios held within the business model, the way managers of the Group are evaluated and the expected frequency and value of sales. For financial assets included in hold to collect business model, the Group assesses past sales as well as expected future sales in order to confirm consistency with a hold to collect business model.

### **Assessment of whether contractual cash flows of a debt financial instrument represent solely payments of principal and interest on the principal amount outstanding (SPPI)**

The Group, at initial recognition of a debt financial asset, assesses whether cash flows are solely payments of principal and interest on the principal amount outstanding. The assessment requires judgement mainly on:

- Whether contractual terms that affect the performance of the instrument relate solely to credit risk, other basic lending risks and profit margin
- For loans in special purpose entities, whether there is a non-recourse feature. The assessment is based on specific index thresholds as well as on the evaluation of the adequacy of equity and of the collaterals that are not related to the asset being financed.
- Whether in case of prepayment or extension the compensation received is considered fair.

### **Expected credit losses of financial assets**

The measurement of expected credit losses requires the use of complex models and significant estimates of future economic conditions and credit behavior, taking into account the events that have occurred until reporting date. Significant estimates are also required to identify the criteria that indicate a significant increase in credit risk, the choice of appropriate methodologies for measuring expected credit risk losses and the determination of the alternative macroeconomic scenarios and the cumulative probabilities associated with these scenarios as well as the assumptions included in the Group's business plan for the reduction of non-performing exposures. Estimates are also required for the determination of the expected duration, the date of initial recognition of revolving facilities as well as the grouping of financial assets based on similar credit risk characteristics.

### **Impairment losses on investments in associates and joint ventures and on non - financial assets**

The Group, at each balance sheet date, assesses for impairment non – financial assets, and in particular goodwill and other intangible assets, as well as its investments in associates and joint ventures and at least annually property, plant and equipment and investment property. Internal estimates are used to a significant degree to determine the recoverable amount of the assets, i.e. the higher between the fair value less costs to sell and value in use.

### **Income Tax**

The Group recognizes assets and liabilities for current and deferred tax, as well as the related expenses, based on estimates concerning the amounts expected to be paid to or recovered from tax authorities in the current and future periods. Estimates are affected by factors such as the practical implementation of the relevant legislation, the expectations regarding the existence of future taxable profit and the settlement of disputes that might exist with tax authorities etc. Future tax audits, changes in tax legislation and the amount of taxable profit actually realised may result in the adjustment of the amount of assets and liabilities for current and deferred tax and in tax payments other than those recognized in the financial statements of the Group. Any adjustments are recognized within the year that they become final.





### Employee defined benefit obligations

Defined benefit obligations are estimated based on actuarial valuations that are mainly performed on an annual basis and that incorporate assumptions regarding discount rates, future changes in salaries and pensions, as well as the return on any plan assets. Any change in these assumptions will affect the amount of obligations recognized.

### Provisions and contingent liabilities

The Group recognises provisions when it estimates that it has a present legal or constructive obligation that can be estimated reliably, and it is almost certain that an outflow of economic benefits will be required to settle the obligation. In contrast, when it is probable that an outflow of resources will be required, or when the amount of liability cannot be measured reliably, the Group does not recognise a provision but it provides disclosures for contingent liabilities, taking into consideration their materiality. The estimation for the probability of the outflow as well as for the amount of the liability are affected by factors which are not controlled by the Group, such as court decisions and the practical implementation of the relevant legislation.

The estimates and judgments applied by the Group in making decisions and in preparing the financial statements are based on historical information and assumptions which at present are considered appropriate. The estimates and judgments are reviewed on an ongoing basis in order to take into account current conditions, and the effect in the financial statements of any changes is recognized in the period in which the estimates are revised.

#### 1.2.1 Going concern principle

The Group applied the going concern principle for the preparation of the financial statements as at 30.9.2019. For the application of this principle, the Group takes into consideration current economic developments in order to make projections for future economic conditions of the environment in which it operates. The main factors that cause uncertainties regarding the application of this principle relate to the economic environment in Greece and abroad and to the liquidity levels of the Hellenic Republic and the banking system.

The prolonged recession that the Greek economy has experienced in recent years led to the significant deterioration in the creditworthiness of corporate and individuals and, consequently, to the rapid increase in non performing loans, resulting in the recognition of significant impairment losses by the Bank and by the Greek banking system in general.

In addition, as a result of the Greek sovereign debt crisis and the measures taken to deal with it, combined with the uncertainties created during the negotiations between the Hellenic Republic, the European Commission, the European Central Bank and the International Monetary Fund regarding the financing of the Hellenic Republic during the first half of 2015, there was a significant outflow of deposits and the imposition of capital controls and of a bank holiday which was announced on 28.6.2015 and lasted until 19.7.2015. On 1 September 2019 capital controls were fully removed. As at the date of the financial statements, the liquidity needs of Greek credit institutions continue to be partially met by the Eurosystem's mechanisms, and the total amount of borrowing is gradually being reduced.

Within the previous year, in particularly in August 2018, the third financial support program of the Hellenic Republic was successfully completed, while providing the possibility of forming a cash buffer aiming at reducing any potential financial risks after the completion of the program. Specifically, according to the 3<sup>rd</sup> Enhanced Surveillance Report of the European Commission it is estimated that available cash, including General Government cash, amounted to € 33.7 billion at the end of March 2019 and is considered enough to cover the financing needs for more than 2 years from today. In addition, the Eurogroup of 5.4.2019, taking into account the implementation of the reform commitments, approved the payment of the amount of € 970 million to the Hellenic Republic, which comes from the profits of Central Banks from bond's markets realized in previous periods and from the abolition of the step-up interest rate margin related to the debt buy-back tranche of the second Greek program. It is also noted that the Hellenic Republic is taking steps to gradually recover its access to the financial markets to meet its financing needs, as specifically described in note 1.2.2.



In addition, the Group successfully completed the European stress testing exercise by the ECB in accordance with the methodology of the European Banking Authority. Based on the exercise, under the adverse scenario, 2020 CET1 ratio stood at 9.7% while under the baseline scenario 2020 CET1 ratio reached 20.4%. Based on feedback received from the Single Supervisory Mechanism (SSM) no capital plan is required.

Based on the above and taking into account:

- the Group's high capital adequacy (note 28),
- the fact that there is an increase in deposits and financing from non-Eurosystem sources,
- the amount of available eligible collaterals through which liquidity is ensured, to the extent required, through the mechanisms of the eurosystem,

the Group estimates that, at least for the next 12 months, the conditions for the application of the going concern principle for the preparation of its financial statements are met.

### 1.2.2 Estimation of the Group's exposure to the Hellenic Republic

The Group's total exposure to Greek Government securities and loans related to the Hellenic Republic is presented in note 25. The main uncertainties regarding the estimations for the recoverability of the Group's total exposure relate to the debt service capacity of the Hellenic Republic, which, in turn, is affected by the development of the macroeconomic environment in Greece and the Eurozone as well as by the levels of liquidity of the Hellenic Republic.

As far as debt sustainability is concerned, as mentioned in note 1.2.1, in the context of the enhanced surveillance and following the positive assessment of the European Commission in the second updated report, the Eurogroup in early April 2019 approved: (i) The abolition of the step-up interest rate margin related to the debt buy-back tranche of the second Greek program and (ii) the transfer of profits from Central Banks (Agreement on Net Financial Assets - ANFA and Securities Markets Programme - SMP,) from Greek bond's markets realized in previous periods. In this context the Greek State is expected to collect a total amount of approximately € 970 million of which in May 2019 a total amount of € 747 million was disbursed.

Finally, it is noted that the Hellenic Republic is taking steps to gradually recover its access to the financial markets to cover its financing needs. In particular, the Hellenic Republic, following the successful completion of the exchange of its bonds issued in the context of Private Sector Involvement (PSI) in the Greek debt restructuring in 2012, with new bonds aiming at aligning the terms of the bonds with market standards, normalizing the Republic's yield curve and enhancing titles' marketability, proceeded, in February 2019, with a new five-year bond issue, as a result of which funds of € 2.5 billion were raised. In addition, in March 2019, the Hellenic Republic successfully issued a ten-year bond that was reissued in October 2019, raising funds of a total amount of € 4 billion. Finally, in July 2019, the Greek government issued a seven-year bond raising € 2.5 billion while it is noteworthy that its yield declined substantially as a result of the international environment and the positive performance of the Greek economy. The decline in Greek bond yields was also confirmed by the issuance, in October 2019, of three-month treasury bills, of an amount of € 487.5 million, with a negative interest rate and of six-months treasury bills, of an amount of € 812.5 million with zero interest rate. In March 2019, in particular, the credit rating agency Moody's raised Greece's sovereign credit rating to B1 from B3, while on 25.10.2019 the credit rating agency Standard & Poor's upgraded Greece's sovereign credit rating to BB- with a positive outlook.

Based on the above, the Group considers that there has been no significant increase in credit risk on the Greek Government securities that it held as at 30.9.2019 since initial recognition, however, it assesses the developments relating to the Greek Government debt in conjunction with the market conditions and it reviews its estimations for the recoverability of its total exposure at each reporting date.



### 1.2.3 Recoverability of deferred tax assets

The Group recognizes deferred tax assets to the extent that it is probable that it will have sufficient future taxable profit available, against which, deductible temporary differences and tax losses carried forward can be utilized.

The amount of deferred tax assets recognized in the consolidated financial statements as at 30.9.2019 has not changed significantly compared to the respective amount as at 31.12.2018. Therefore, what is stated in note 1.33.3 of the annual financial statements of 31.12.2018 regarding the main categories of deferred tax assets recognized is also applicable to these financial statements. In addition, regarding the methodology applied for the recoverability assessment, what is stated in the aforementioned note of the annual financial statements is also applicable, taking also into consideration the targets and the action plan included in the Bank's business plan for management of Non-Performing Exposures (NPE) and Non-Performing Loans (NPL), that was submitted on 29 March 2019 to the Single Supervisory Mechanism (SSM), as well as the elements that formed the result of the current period.



## INCOME STATEMENT

### 2. Net interest income

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018*	30.9.2019	30.9.2018*
<b>Interest and similar income</b>				
Due from banks	1,097	(959)	374	(722)
Loans and advances to customers measured at amortized cost	1,275,884	1,471,870	415,692	477,098
Loans and advances to customers measured at fair value through profit or loss	10,104	10,591	3,666	2,634
Trading securities	208	229	39	15
Investment securities measured at fair value through other comprehensive income	125,039	124,483	39,943	38,178
Investment securities measured at fair value through profit or loss	820	757	166	172
Investment securities measured at amortized cost	831		831	
Derivative financial instruments	115,748	111,636	37,152	36,840
Other	1,241	2,363	176	450
<b>Total</b>	<b>1,530,972</b>	<b>1,720,970</b>	<b>498,039</b>	<b>554,665</b>
<b>Interest expense and similar charges</b>				
Due to banks	(33,371)	(51,880)	(6,804)	(15,962)
Due to customers	(132,625)	(148,622)	(42,300)	(50,143)
Debt securities in issue and other borrowed funds	(15,422)	(17,995)	(4,833)	(5,186)
Lease liabilities	(4,225)		(1,348)	
Derivative financial instruments	(126,594)	(115,225)	(41,084)	(37,879)
Other	(58,598)	(57,809)	(18,491)	(18,864)
<b>Total</b>	<b>(370,835)</b>	<b>(391,531)</b>	<b>(114,860)</b>	<b>(128,034)</b>
<b>Net interest income</b>	<b>1,160,137</b>	<b>1,329,439</b>	<b>383,179</b>	<b>426,631</b>

During the nine month period of 2019, net interest income decreased compared to the corresponding nine month period of the comparative period, mainly due to the reduction in interest income on loan portfolios. The aforementioned decrease was partially offset by the due to customers cost reduction as well as the reduction of the borrowing cost from credit institutions due to the repayment of Emergency Liquidity Assistance (ELA) funding and the entering into lower interest rate repo transactions.

\* Certain figures of the previous period have been restated in order to be comparable.



### 3. Net fee and commission income and other income

#### Net fee and commission income

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018*	30.9.2019	30.9.2018*
Loans	36,460	32,670	13,222	9,735
Letters of guarantee	34,491	38,519	11,822	11,973
Imports-exports	6,793	7,091	2,279	2,366
Credit cards	53,715	55,431	23,992	18,963
Transaction fees	34,257	34,355	12,126	11,504
Mutual funds	26,484	26,638	10,015	7,934
Advisory fees and securities transaction fees	970	968	473	255
Brokerage services	5,042	4,430	1,813	960
Foreign exchange trades	13,649	13,782	4,886	4,691
Other	35,133	30,908	14,969	9,713
<b>Total</b>	<b>246,994</b>	<b>244,792</b>	<b>95,597</b>	<b>78,094</b>

During the nine month period of 2019, net fee and commission income presents an increase compared to the respective nine month period of the comparative period, due to the increase in "Other" commissions which is attributed to the increase of commissions received on intermediation services.

#### Fee and commission income and other income

The table below presents income from contracts per operating segment, that fall within the scope of I.F.R.S. 15:

From 1 January to 30.9.2019							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
<b>Fee and commission income</b>							
Loans	5,473	25,555	256	5,318	631		37,232
Letters of guarantee	1,523	30,770	2	611	1,585		34,491
Imports-exports	1,422	4,855		5	510		6,793
Credit cards	77,126	37,201	4	85	7,011		121,428
Transaction fees	15,195	8,271	305	712	9,774		34,257
Mutual funds			26,406	68	9		26,484
Advisory fees and securities transaction fees				848	123		970
Brokerage services				5,737	125		5,862
Foreign exchange trades	8,857	3,644	18	745	386		13,649
Other	16,666	6,589	7,137	260	9,296		39,947
<b>Total</b>	<b>126,262</b>	<b>116,885</b>	<b>34,127</b>	<b>14,389</b>	<b>29,450</b>	<b>-</b>	<b>321,113</b>
<b>Other income</b>							-
Hotel services					1,577		1,577
Disposals of fixed assets		1,116			2,710	1,544	5,369
Other	2,092	520	9	1,421	3,314	2,752	10,108
<b>Total</b>	<b>2,092</b>	<b>1,635</b>	<b>9</b>	<b>1,421</b>	<b>7,600</b>	<b>4,296</b>	<b>17,054</b>

\* Certain figures of the previous period have been restated, as described in detail in note 32.



From 1 January to 30.9.2018*							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
<b>Fee and commission income</b>							
Loans	3,864	26,442	185	2,419	543		33,452
Letters of guarantee	1,587	35,256	4	460	1,212		38,519
Imports-exports	1,856	4,833			402		7,091
Credit cards	65,183	39,437		23	5,819		110,462
Transaction fees	16,639	7,702	218	865	8,930		34,355
Mutual funds			26,638	63			26,701
Advisory fees and securities transaction fees				829	139		968
Brokerage services	116			5,057	134		5,307
Foreign exchange trades	9,346	3,083	31	961	360		13,782
Other	16,821	1,959	7,348	119	8,493		34,741
<b>Total</b>	<b>115,413</b>	<b>118,712</b>	<b>34,424</b>	<b>10,796</b>	<b>26,032</b>	<b>-</b>	<b>305,378</b>
<b>Other income</b>							
Hotel services					1,591		1,591
Disposals of fixed assets					1,757	1,107	2,864
Other	1,513	342		1,272	531	3,172	6,830
<b>Total</b>	<b>1,513</b>	<b>342</b>	<b>-</b>	<b>1,272</b>	<b>3,879</b>	<b>4,279</b>	<b>11,285</b>

From 1 July to 30.9.2019							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
<b>Fee and commission income</b>							
Loans	1,978	10,078	135	1,116	194		13,500
Letters of guarantee	543	10,439	1	304	535		11,822
Imports-exports	490	1,609		2	177		2,279
Credit cards	36,543	16,325	3	42	2,569		55,483
Transaction fees	5,392	2,748	110	298	3,578		12,126
Mutual funds			9,989	22	3		10,015
Advisory fees and securities transaction fees				422	52		473
Brokerage services				2,084	35		2,119
Foreign exchange trades	3,204	1,217	7	314	145		4,886
Other	6,369	4,645	2,442	117	3,318		16,890
<b>Total</b>	<b>54,519</b>	<b>47,061</b>	<b>12,686</b>	<b>4,721</b>	<b>10,606</b>	<b>-</b>	<b>129,593</b>
<b>Other income</b>							
Hotel services					539		539
Disposals of fixed assets		324			926	269	1,518
Other	804	39		(34)	297	741	1,847
<b>Total</b>	<b>804</b>	<b>362</b>	<b>-</b>	<b>(34)</b>	<b>1,761</b>	<b>1,010</b>	<b>3,904</b>

\* Certain figures of the previous period have been restated, as described in detail in note 32.



From 1 July to 30.9.2018*							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
<b>Fee and commission income</b>							
Loans	1,050	8,497	2	277	169		9,994
Letters of guarantee	516	10,893	(1)	124	441		11,973
Imports-exports	539	1,681		(7)	153		2,366
Credit cards	28,170	16,189		(0)	2,072		46,431
Transaction fees	5,562	2,402	95	274	3,170		11,504
Mutual funds			7,976	21			7,997
Advisory fees and securities transaction fees				221	34		255
Brokerage services	28			1,214	43		1,285
Foreign exchange trades	3,135	1,031	17	383	124		4,691
Other	5,901	560	2,076	(1)	2,614		11,151
<b>Total</b>	<b>44,902</b>	<b>41,253</b>	<b>10,165</b>	<b>2,506</b>	<b>8,820</b>	<b>-</b>	<b>107,647</b>
<b>Other income</b>							
Hotel services					566		566
Disposals of fixed assets					324	799	1,123
Other	4	(4)		512	261	680	1,453
<b>Total</b>	<b>4</b>	<b>(4)</b>	<b>-</b>	<b>512</b>	<b>1,151</b>	<b>1,479</b>	<b>3,142</b>

"Other income" of Income Statement includes additionally income from insurance activities, income from insurance indemnities and operating lease income, which are not presented in the above table since they do not fall within the scope of I.F.R.S. 15.

#### 4. Gains less losses on financial transactions and impairments on Group companies

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018	30.9.2019	30.9.2018
Foreign exchange differences	27,770	9,641	12,810	6,173
Trading securities:				
- Bonds	3,065	1,066	961	447
- Shares	2,329	(298)	347	(149)
Financial assets measured at fair value through profit or loss:				
- Bonds	1,344	627	33	(124)
- Other securities	3,321	(743)	420	(349)
- Loans	(10,032)	(32,852)	1,322	(17,856)
Financial assets measured at fair value through other comprehensive income:				
- Bonds and treasury bills	233,715	414,002	65,502	147,872
- Other securities				
Impairments / Sale of holdings	12,056	(9,040)		
Derivative financial instruments	830	10,916	(1,790)	1,184
Other financial instruments	2,382	(4,346)	744	395
<b>Total</b>	<b>276,780</b>	<b>388,973</b>	<b>80,349</b>	<b>137,593</b>

"Gains less losses on financial transactions and impairments on Group companies" of the nine month period of 2019 were mainly affected by:

\* Certain figures of the previous period have been restated, as described in detail in note 32.



- Gains of € 233,715 included in the caption “Bonds and treasury bills measured at fair value through other comprehensive income” that relate to gains from sales of Greek Government Bonds and Treasury bills of € 220,992 and of other corporate bonds of € 12,723.
- Loss of € 10,032 of “Loans measured at fair value through profit or loss” which is mainly attributed to the change in their fair value in the nine month period.
- Gains of € 12,056 included in the caption “Impairments / Sale of holdings”, out of which the amount of € 12,278 relates to the disposal of the subsidiary Alpha Investment Property I A.E., as described in detail in note 30.

“Gains less losses on financial transactions and impairments on Group companies” of the nine month period of 2018 were mainly affected by:

- Gains of € 414,002 included in the caption “Bonds at fair value through other comprehensive income” that relate to gains of sales of Greek Government Bonds and Treasury bills of € 406,283 and of other corporate bonds of € 7,719.
- Loss of € 32,852 of loans measured at fair value through profit or loss which is attributed to the change in their fair value within the nine month period.
- Loss of € 7,300 included in the caption “Impairments / Sale of holdings” and relating to the impairment of the joint venture APE Investment Property A.E., which was classified as asset held for sale, according to I.F.R.S. 5 (note 30).

## 5. Staff costs

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018	30.9.2019	30.9.2018
Wages and salaries	245,536	252,104	81,132	83,779
Social security contributions	64,445	67,074	21,121	22,065
Employee defined benefit obligation of Group	2,762	3,107	921	1,135
Other charges	29,167	27,530	9,104	8,763
<b>Total</b>	<b>341,910</b>	<b>349,815</b>	<b>112,278</b>	<b>115,742</b>

Staff costs present a decrease in the nine month period of 2019, compared to the comparative period of 2018, mainly due to the decrease in Bank’s personnel.

The captions “Wages and salaries” and “Social security contributions” have been burdened with amounts that relate to performance incentives scheme to employees.

More specifically, in the last quarter of 2018, the Group, following the relevant Board of Directors (BoD) approval, recorded an amount of € 9,450, relating to accrual for the performance or sales incentives scheme to employees. Part of this provision, amounting to € 2,758 that relates to the Sales Incentive Programme (SIP), has already been paid within 2019, since it is a performance related allowance and thus is paid in cash, within 12 months from the end of the period during which the service has been rendered. Upon specification of the terms of the performance incentives scheme to employees, which was recently approved by the BoD, the Group recorded an additional amount of € 3,701 which was charged in “Staff Costs”. Therefore, the amount recognized for the performance incentives to employees as of 30.9.2019, stands at € 10,392 and has been recognized in “Other liabilities”.

It is noted that based on the terms of the aforementioned programs, the allowance to employees may be paid in cash, shares or other financial instruments whereas, for part of employees, up to 60% of the allowance may be paid within the year determined for payment, while the disbursement of at least 40% of the allowance is postponed for 3 years following the first payment (and will be paid on the relevant annual anniversaries under conditions). The allowance is recognized upon achievement of the targets set or when all other relevant conditions are met (i.e. stay in service).





## 6. General administrative expenses

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018*	30.9.2019	30.9.2018*
Operating lease rentals for buildings	785	28,677	322	9,467
Rent and maintenance of EDP equipment	14,175	15,040	4,943	5,097
EDP expenses	22,232	19,780	7,363	6,008
Marketing and advertisement expenses	15,065	19,791	4,294	7,535
Telecommunications and postage	13,280	12,223	3,611	3,882
Third party fees	38,901	51,660	11,752	18,891
Contribution to the Deposit Guarantee Fund - Investment fund and Resolution Scheme	42,722	39,033	13,045	12,491
Services from collection agencies	7,699	13,721	2,370	4,808
Consultants fees	7,314	6,315	2,724	2,076
Insurance	7,322	7,181	2,390	2,257
Electricity	6,999	7,020	2,487	2,594
Building and equipment maintenance	5,591	5,816	1,757	1,965
Security of buildings-money transfers	11,164	10,534	4,073	3,491
Cleaning	3,980	3,922	1,339	1,394
Consumables	3,159	3,133	1,103	1,393
Commission for the amount of Deferred tax asset guaranteed by the Greek Government (note 9)	4,128	4,224	1,338	1,394
Taxes (VAT, real estate etc.)	66,935	67,769	24,665	24,836
Other	75,592	69,331	28,322	22,072
<b>Total</b>	<b>347,043</b>	<b>385,170</b>	<b>117,898</b>	<b>131,651</b>

General administrative expenses present a decrease in the nine month period of 2019 compared to the corresponding nine month period of the comparative period, mainly due to the decrease in "Operating lease rentals for buildings". More specifically, the implementation of I.F.R.S. 16, effective from 1.1.2019, differentiates the accounting of leases, since the classification of leases for lessees as either operating or finance is eliminated. For all leases with term of more than 12 months, the lessee is required to recognize the right-of-use asset, with the corresponding depreciation charge included in the caption "Depreciation" of Income Statement, as well as the corresponding obligation to pay the lease payments for which interest expense is calculated and included in the relevant caption of Income Statement.

The caption "Operating lease rentals for buildings" and "Rent and maintenance of EDP equipment" include lease contract expenses, the terms of which do not exceed 12 months.

The increase in "Contribution to the Deposit Guarantee Fund - Investment fund and Resolution Scheme" during the nine month period of 2019 as compared to the corresponding nine month period of 2018, includes the impact of the increased contributions to local deposit guarantee fund and resolution, by a Group banking subsidiary.

Third party fees and services from collection agencies, decreased during the nine month period of 2019, compared to the comparative nine month period, as a result of the implementation of the new "Retail Transformation Plan" since 1.7.2018, aiming to a more efficient NPE management by the Group.

\* Certain figures of the previous period have been restated, as described in detail in note 32.



## 7. Impairment losses and provisions to cover credit risk

The caption of “Impairment losses and provisions to cover credit risk” for the period from 1 January, to 30 September 2019 amounted to € 739,494 (30.9.2018: € 1,013,113) as well as for the period from 1 July to 30 September 2019 amounted to € 264,550 (third quarter of 2018: € 313,613) includes the Impairment losses and provisions to cover credit risk on loans and advances to customers, which are presented in the table below, along with the Impairment losses on other financial instruments, which are presented in note 8.

### Impairment losses and provisions to cover credit risk on loans and advances to customers

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018	30.9.2019	30.9.2018
Impairment losses on loans	554,121	971,752	212,620	299,296
Impairment losses of receivables from customers	10,421	13,183	11,412	3,059
Provisions to cover credit risk on off balance sheet items (note 19)	11,707	(21,968)	2,694	(2,316)
(Gains) / Losses on modifications of contractual terms of loans and advances to customers	195,379	73,158	41,967	1,363
Recoveries	(22,275)	(18,845)	(7,211)	(5,430)
Impairment losses on other assets	673	1,846	24	1,407
<b>Total</b>	<b>750,026</b>	<b>1,019,126</b>	<b>261,506</b>	<b>297,379</b>

Losses on modifications of contractual terms of loans to customers represent the difference between the carrying amount of the loan and the present value of the new contractual cash flows, discounted using, the original effective interest rate of the loan. This difference affects the balance of loans to customers before impairment and consequently the expected credit loss. The net impact of modifications of the contractual terms of loans to customers, on the Income Statement for the period 1.1 to 30.9.2019, after taking into consideration the impairment losses of the period for these loans, amounts to € 141,969.

## 8. Impairment losses on other financial instruments

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018	30.9.2019	30.9.2018
Impairment losses on debt securities and other securities measured at amortized cost	2,698		2,698	
Impairment losses on debt securities and other securities measured at fair value through other comprehensive income recognized directly in equity	(13,182)	(6,119)	375	16,433
Impairment losses on due from banks	(48)	106	(29)	(199)
<b>Total</b>	<b>(10,532)</b>	<b>(6,013)</b>	<b>3,044</b>	<b>16,234</b>

The positive impact on the expected credit losses of debt securities during the nine month period of 2019 derives from the upgrading of the Hellenic Republic credit rating by Moody's from B3 to B1 on 1.3.2019.

## 9. Income tax

Based on Article 23 of Law 4579/2018 “Obligations of air carriers concerning passenger records-adaptation of legislation to Directive (EU) 2016/681 and other provisions” which amends article 58 of the Income Tax Code, the corporate income tax rate for legal entities will be gradually reduced from 29% effective today, to 25% for income earned in the tax year 2022 and onwards. The tax rate will be reduced by one percent each year, effective from the tax year 2019, for which the tax rate is set at 28%. With explicit reference to the law, this reduction does not apply to credit institutions, for which the tax rate remains at 29%.



For the Bank's subsidiaries and the Bank's branch operating in other countries, the applicable nominal tax rates for the year 2019 are as follows, with no changes compared to the tax rates of year 2018:

Cyprus	12.5	Albania	15
Bulgaria	10	Jersey	10
Serbia	15	United Kingdom	19
Romania	16	Ireland	12.5

In accordance with article 65A of Law 4174/2013, from 2011, the statutory auditors and audit firms conducting statutory audits to a Societe Anonyme (S.A.), are obliged to issue an Annual Tax Certificate on the compliance on tax issues. This tax certificate is submitted to the entity being audited within the first ten days of the tenth month after the end of the audited financial year, as well as, electronically to the Ministry of Finance, no later than the end of the tenth month after the end of the audited financial year. In accordance with article 56 of Law 4410/3.8.2016 for the fiscal years from 1.1.2016 and onwards, the issuance of tax certificate is optional. The intention of the group entities is to continue to obtain the tax certificate.

For fiscal years 2011 up to 2018 the tax audit conducted in accordance with article 65A of Law 4174/2013 for the Bank and its local subsidiaries has been completed and the relevant certificates have been obtained without any qualifications on the tax issues covered.

The income tax in the income statement is analyzed in the table below:

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018	30.9.2019	30.9.2018
Current tax	10,099	29,612	4,250	5,009
Deferred tax	38,074	80,502	11,699	14,151
<b>Total</b>	<b>48,173</b>	<b>110,114</b>	<b>15,949</b>	<b>19,160</b>

Deferred tax recognized in the income statement is attributable to temporary differences, the effect of which is analyzed in the table below:

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018	30.9.2019	30.9.2018
Debit difference of Law 4046/2012	33,416	33,416	11,139	11,139
Debit difference of Law 4465/2017	(18,877)	(224,219)	(23,368)	(11,961)
Write-offs, depreciation, impairment of fixed assets and leases	12,226	12,002	5,248	4,244
Loans' portfolio	(147,201)	93,947	(38,181)	(10,739)
Valuation of loans due to hedging	9	(91)	(2)	(8)
Defined benefit obligation and insurance funds	(51)	1,269	(85)	1,652
Valuation of derivatives	(2,405)	4,763	(3,589)	1,907
Effective interest rate	986	639	175	199
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	(55)	(1,583)	400	1,302
Valuation / Impairment of bonds and other securities	14,889	42,257	9,508	(8,220)
Tax losses carried forward	145,413	116,427	45,856	15,224
Other temporary differences	(276)	1,675	4,598	9,412
<b>Total</b>	<b>38,074</b>	<b>80,502</b>	<b>11,699</b>	<b>14,151</b>

The caption "Debit difference of Law 4046/2012" relates to the deferred tax asset on tax losses, due to the Bank's participation in the Greek government bonds exchange program (PSI) and the Greek government bond buyback program on December 2012, which have been recognized as a debit difference in accordance with Law 4046/14.2.2012 and Law 4110/23.1.2013. According to Law 4110/23.1.2013 the "debit difference" is deductible for tax purposes, gradually in equal installments, within 30 years.



Moreover, according to article 5 of Law 4303/17.10.2014 "Ratification of the Legislative Act Emergency legislation to replenish the General Secretary of Revenue due to early termination of his service (A' 136) and other provisions", which replaced article 27A of Law 4172/2013, deferred tax assets of legal entities supervised by the Bank of Greece, under article 26 paragraphs 5, 6 and 7 of Law 4172/2013 that have been or will be recognized and are due to the debit difference arising from the PSI and the accumulated provisions and other general losses due to credit risk, with respect to amounts up to 31 December 2014, are considered final and settled claims against the State, if, the accounting result for the period, after taxes, is a loss, based on the audited and approved financial statements by the Ordinary Shareholders' General Meeting.

The participation in the Law is achieved with the approval of the General Meeting of Shareholders and relates to tax assets arising from 2016 and onwards, and refers to the fiscal year 2015 and onwards, while there is provision for the termination of participation with the same procedure and after obtaining relevant approval from the regulatory authority.

According to article 4 of Law 4340/1.11.2015 "Recapitalization of financial institutions and other provisions of the Ministry of Finance" the above were amended regarding the time of the application which is postponed for a year. In addition, the amount of the relevant deferred tax asset which is included in the above provisions of article 5 of Law 4303/17.10.2014 and relates to accumulated provisions and other general losses for credit risk, is limited to the amount of provisions for credit risk which were accounted for until 30 June 2015.

In connection with the amount included in caption "Debit difference of Law 4465/2017", according to article 43 of Law 4465/4.4.2017 "Integration of Directive 2014/92/EU of the European Parliament and Council held on 23.7.2014 for the comparability of charges related to payment accounts, the change of payment account and the access to payment accounts with basic characteristics and other provisions", the articles 27 and 27A of the Income Tax Code were amended (Law 4172/2013). According to the new legislation, the debit difference that relates to the loss, that will arise from the write-off of debtors' debts and from the sale of loans of the legal entities supervised by the Bank of Greece, is recognized as a deduction from gross income and is amortized equally over a period of 20 years. The deferred tax asset which will be recognized for the abovementioned debit difference as well as of any accounting write-offs of loans or credits, not converted into debit difference until the end of the year when the accounting write-off took place, are converted into a definite and cleared claim against the State, based on the abovementioned terms and conditions.

Based on the above mentioned Law, the total amount of deferred tax asset from (a) the debit difference from the write-off of debtors' debts and the sale of loans, (b) the temporary differences from any accounting write-off of loans and credits and (c) the temporary differences from accumulated provisions and other losses due to credit risk, is limited to the total tax amount related to accumulated provisions and other losses due to credit risk, recognised until 30.6.2015.

This amendment ensures that the loan write-offs and disposals, aiming to decrease the non performing loans, will not result in the loss of regulatory capital.

The above are effective since 1.1.2016.

On 30.9.2019 the amount of deferred tax assets which is estimated to be within the scope of the Law 4465/2017, including also the unamortised balance of the debit difference of PSI, amounts to € 3,177.9 million (31.12.2018: € 3,240.6 million).

According to article 82 of Law 4472/19.5.2017 "Public Pension Provisions and amendment of provisions of Law 4387/2016, measures for the implementation of budgetary targets and reforms, social support measures and labor regulations, Medium-term Fiscal Strategy Framework 2018-2021 and other provisions" credit institutions and other entities that fall under the provisions of article 27A of Law 4172/2013, are required to pay an annual commission to the Greek State for the amount of the guaranteed deferred tax asset that results from the difference between the tax rate currently in force (29%) and the tax rate that was in force until 31.12.2014 (26%). The respective amount has been included in caption "General and administrative expenses" (note 6).



A reconciliation between the nominal and effective tax rate is provided below:

	FROM 1 JANUARY TO			
	30.9.2019		30.9.2018	
	%		%	
<b>Profit before income tax</b>		139,702		163,834
Income tax (nominal tax rate)	29.81	41,649	48.60	79,423
<b>Increase / (Decrease) due to:</b>				
Non taxable income	(1.71)	(2,389)	(1.12)	(1,823)
Non deductible expenses	6.70	9,365	2.58	4,222
Other temporary differences	(0.32)	(452)	17.31	28,292
<b>Total</b>	<b>34.47</b>	<b>48,173</b>	<b>67.37</b>	<b>110,114</b>

	FROM 1 JULY TO			
	30.9.2019		30.9.2018	
	%		%	
<b>Profit before income tax</b>		20,616		60,306
Income tax (nominal tax rate)	43.83	9,037	34.52	20,783
<b>Increase / (Decrease) due to:</b>				
Non taxable income	(3.97)	(819)	(2.78)	(1,671)
Non deductible expenses	27.62	5,695	5.92	3,565
Other temporary differences	9.88	2,036	(5.84)	(3,517)
<b>Total</b>	<b>77.35</b>	<b>15,949</b>	<b>31.82</b>	<b>19,160</b>

The nominal tax rate is the weighted average nominal tax rate which is calculated using the income tax ratio on earnings before taxes, based on the nominal tax rate and income, for each of the Group's subsidiaries.

#### Income tax of other comprehensive income

	FROM 1 JANUARY TO					
	30.9.2019			30.9.2018		
	Before income tax	Income tax	After income tax	Before income tax	Income tax	After income tax
<b>Amounts that may be reclassified to the Income Statement</b>						
Net change in securities' reserve measured at fair value through other comprehensive income	657,417	(189,221)	468,196	(486,368)	140,780	(345,588)
Net change in cash flow hedge reserve	(135,572)	39,316	(96,256)	15,281	(4,431)	10,850
Foreign exchange differences on translating and hedging the net investment in foreign operations	(198)	(1,942)	(2,140)	9,494	(2,254)	7,240
Changes in the share of other comprehensive income of associates and joint ventures				(149)		(149)
	<b>521,647</b>	<b>(151,847)</b>	<b>369,800</b>	<b>(461,742)</b>	<b>134,095</b>	<b>(327,647)</b>
<b>Amounts that will not be reclassified to the Income Statement</b>						
Net change in actuarial gains / (losses) of defined benefit obligations				123	(36)	87
Gains / (Losses) from shares measured at fair value through other comprehensive income	(8,607)	3,018	(5,589)	(80)	(544)	(624)
	<b>(8,607)</b>	<b>3,018</b>	<b>(5,589)</b>	<b>43</b>	<b>(580)</b>	<b>(537)</b>
<b>Total</b>	<b>513,040</b>	<b>(148,829)</b>	<b>364,211</b>	<b>(461,699)</b>	<b>133,515</b>	<b>(328,184)</b>



	FROM 1 JULY TO					
	30.9.2019			30.9.2018		
	Before income tax	Income tax	After income tax	Before income tax	Income tax	After income tax
<b>Amounts that may be reclassified to the Income Statement</b>						
Net change in securities' reserve measured at fair value through other comprehensive income	239,813	(70,372)	169,441	(189,851)	55,313	(134,538)
Net change in cash flow hedge reserve	(52,184)	15,134	(37,050)	16,734	(4,852)	11,882
Foreign exchange differences on translating and hedging the net investment in foreign operations	(34)	(173)	(207)	(432)	(44)	(476)
Changes in the share of other comprehensive income of associates and joint ventures				(149)		(149)
	<b>187,595</b>	<b>(55,411)</b>	<b>132,184</b>	<b>(173,698)</b>	<b>50,417</b>	<b>(123,281)</b>
<b>Amounts that will not be reclassified to the Income Statement</b>						
Net change in actuarial gains / (losses) of defined benefit obligations						
Gains / (Losses) from shares measured at fair value through other comprehensive income	908	(234)	674	(2,362)	271	(2,091)
	<b>908</b>	<b>(234)</b>	<b>674</b>	<b>(2,362)</b>	<b>271</b>	<b>(2,091)</b>
<b>Total</b>	<b>188,503</b>	<b>(55,645)</b>	<b>132,858</b>	<b>(176,060)</b>	<b>50,688</b>	<b>(125,372)</b>

On 1.1.2019, a credit deferred tax amounting to € 11,408 was recognized in the caption "Retained earnings", as a result of the implementation of I.F.R.S. 16.

### Receivables from withholding taxes

Further to the information provided in note 13 of Group Financial Statements as at 31.12.2018, it is noted that article 93 of Law 4605/1.4.2019 "Alignment of Greek legislation with the European Parliament and Council Directive (EU) 2016/943 of 8.6.2016 on the protection of undisclosed know-how and business information (trade secrets) against their unlawful acquisition, use and disclosure (EEL 157, 15.6.2016) - Measures for accelerating the work of the Ministry of Finance and other provisions" provides that:

- The credit balances of fiscal years 2008 and 2010 up to 2012 that arose from withholding taxes on specially taxed income are carried forward and will be offset at the time when income tax is incurred and in proportion to that tax. This set-off procedure also includes any amounts refunded by virtue of court decisions, for which there is an obligation to return them to the Greek State for the amount and the time there is income tax. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 85,156.
- The credit balances that arose under Law 4046/2012 and have not been offset after the end of the five-years period from their recognition, will be offset starting from 1.1.2020 in ten equal annual installments with any tax liability of the banks. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 47,106.

Following the ratification of the Law, the amounts of withholding taxes affected by the decisions of the Hellenic Council of State will be subject to the offset procedure, as described in the above provisions of the Law.

On 29 March 2019, the Ministry of Finance of Romania published through the GEO Act 19/2019, the modifications of GEO Emergency Act 114/2018 which was approved three months earlier. According to these provisions, a new tax of 0.2% (for Banks with market share of less than 1%) or 0.4% (for Banks with a share of more than 1% such as Alpha Bank Romania) is introduced, on the taxable amount of certain financial assets of credit institutions as defined in the Act. Indicatively, cash, cash balances with central banks, debt securities issued by public administrations, loans granted to public administrations



etc. are excluded from the taxable amount. The tax will be calculated annually and paid in two six-monthly installments. The tax payable may be reduced if and when financial institutions increase their borrowings in excess of a specific target and / or reduce the interest rate margin below a certain level.

Banking institutions with accounting loss before tax on assets, are not subject to this tax, and if this tax exceeds the level of accounting profit then it is limited to the amount of accounting profit, with no effect on future tax payments. Expenses relating to these fees are tax deductible. According to the provisions of IFRIC 21 "Levies", the liability will be recognized on 31.12.2019, when the binding event, namely the existence of taxable financial assets and profits before the said tax, will lead to its final payment by off-setting the relevant advance payment.

## 10. Earnings / (Losses) per share

### a. Basic

Basic earnings / (losses) per share are calculated by dividing the profit / (losses) after income tax attributable to ordinary equity owners of the Bank, by the weighted average number of outstanding ordinary shares, after deducting the weighted average number of treasury shares held by the Bank, during the same period.

### b. Diluted

Diluted earnings / (losses) per share are calculated by adjusting the weighted average number of ordinary shares outstanding to the presumed conversion amount of all dilutive potential ordinary shares. The Bank does not have such shares, therefore there is no reason for differentiating its diluted earnings / (losses) per share from the basic ones.

	FROM 1 JANUARY TO		FROM 1 JULY TO	
	30.9.2019	30.9.2018*	30.9.2019	30.9.2018*
<b>Profit / (Losses) attributable to equity owners of the Bank</b>	<b>91,633</b>	<b>53,819</b>	<b>4,806</b>	<b>41,165</b>
Weighted average number of outstanding ordinary shares	1,543,699,381	1,543,699,381	1,543,699,381	1,543,699,381
Basic and diluted earnings / (losses) per share (in €)	0.06	0.03	0.003	0.03

\* Certain figures of the previous period have been restated, as described in detail in note 32.



## ASSETS

### 11. Due from banks

	30.9.2019	31.12.2018
Placements with other Banks	780,393	926,885
Guarantees for derivative securities coverage and repurchase agreement	1,568,892	1,059,932
Sale and repurchase agreements (Reverse repos)	1,234,597	547,180
Loans to credit institutions	36,655	36,620
Less:		
Allowance for impairment losses (note 27a)	(70,104)	(70,125)
<b>Total</b>	<b>3,550,433</b>	<b>2,500,492</b>

The increase in "Due from banks" is mainly attributed to the increase of reverse repos transactions, through which, government and corporate securities of the Eurozone were assigned to the Bank, and were used as collaterals for refinancing operations from the ECB, as well as to repo transactions with other Banks.

### 12. Loans and advances to customers

	30.9.2019	31.12.2018
Loans measured at amortised cost	47,184,396	50,021,398
Leasing	602,164	676,673
Less: Allowance for impairment losses	(8,880,457)	(10,977,339)
<b>Total loans</b>	<b>38,906,103</b>	<b>39,720,732</b>
Receivables from customers measured at amortised cost	173,157	189,127
Loans measured at fair value through profit or loss	371,745	318,460
<b>Loans and advances to customers</b>	<b>39,451,005</b>	<b>40,228,319</b>

As at 30.9.2019, the caption "Receivables from customers measured at amortized cost" includes accumulated impairments of € 44,101 (31.12.2018: € 31,862).

It is noted that the Bank has proceeded with the securitization of consumer, corporate loans and credit cards, while Alpha Leasing A.E. has proceeded with the securitization of finance leases, through special purpose entities controlled by the Group. Based on the contractual terms and structure of the above transactions (e.g. provision of guarantees or/and credit enhancement or holding the bonds issued by the special purpose entities), the Bank and Alpha Leasing A.E. retained in all cases the risks and rewards deriving from the securitized portfolios. The securitized loans are separately presented in the following tables.

The following tables, present an analysis of loan portfolio per type and classification category.



**Loans measured at amortized cost**

	30.9.2019	31.12.2018
<b>Individuals</b>		
Mortgages	17,538,882	18,329,092
Consumer:		
- Non-securitized	3,501,907	3,111,220
- Securitized	716,314	1,205,259
Credit cards:		
- Non-securitized	666,920	738,038
- Securitized	580,845	589,300
Other	1,227	975
<b>Total loans to individuals</b>	<b>23,006,095</b>	<b>23,973,884</b>
<b>Corporate:</b>		
Corporate loans:		
- Non-securitized	21,118,425	23,060,515
- Securitized	2,552,665	2,441,014
Leasing:		
- Non-securitized	374,323	358,871
- Securitized	227,841	317,802
Factoring	507,211	545,985
<b>Total corporate loans</b>	<b>24,780,465</b>	<b>26,724,187</b>
<b>Total</b>	<b>47,786,560</b>	<b>50,698,071</b>
Less: Allowance for impairment losses	(8,880,457)	(10,977,339)
<b>Total loans measured at amortized cost</b>	<b>38,906,103</b>	<b>39,720,732</b>

As at 30.9.2019 mortgage loans included loans amounting to € 4,792,212 (31.12.2018: € 4,624,700) that have been granted as collateral in the following covered bond programs of the Bank: Covered Bond Program I, Covered Bond Program II and Secured Note Program, as well as the Direct Issuance Covered Bond Program of Alpha Bank Romania.

On 30.9.2019 the nominal value of the bonds issued under the Covered Bond Program I amounted to € 500,000 (31.12.2018: € 500,000), under the Direct Issuance of Covered Bond Program II amounted to € 2,000,000 (31.12.2018: € 2,000,000), under the Secured Note Program amounted to € 1,050,000 (31.12.2018: € 1,050,00) and under the Direct Issuance Covered Bond Program of Alpha Bank Romania amounted to € 200,000 (31.12.2018: € 0) (note 18).

In the context of the Business Plan for NPE Management which the Bank submitted on 29 March 2019 and has been prepared according to the methodology and models of the supervisory authorities, the Group is obliged to monitor and report to the SSM the level of the achievement of the targets set in the Plan on a consolidated basis, until the end of 2021, through relevant supervisory reports. As at 30.9.2019, the balance of the NPE loans included in Group's loans and advances to customers amounted to € 22.4 billion.



The movement of accumulated allowance for impairment losses on loans that are measured at amortised cost is as follows:

### Allowance for impairment losses

<b>Balance 1.1.2018</b>	<b>12,455,003</b>
<b>Changes for the period 1.1 - 30.9.2018</b>	
Impairment losses for the period	1,124,634
Transfer of accumulated allowance for impairment losses to assets held for sale	(1,397,549)
Derecognition due to significant modifications in loans' contractual terms	(2,347)
Change in present value of the impairment losses	98,887
Foreign exchange differences / Other movements	32,271
Disposal of impaired loans	(7,014)
Loans written-off during the period	(1,181,258)
<b>Balance 30.9.2018</b>	<b>11,122,627</b>
<b>Changes for the period 1.10 - 31.12.2018</b>	
Impairment losses for the period	736,429
Transfer of accumulated allowance for impairment losses to assets held for sale	3,206
Derecognition due to significant modifications in loans' contractual terms	(175,356)
Change in present value of the impairment losses	24,297
Foreign exchange differences	9,920
Disposal of impaired loans	(8,893)
Loans written-off during the period	(671,936)
Other movements	(62,955)
<b>Balance 31.12.2018</b>	<b>10,977,339</b>
<b>Changes for the period 1.1 - 30.9.2019</b>	
Impairment losses for the period	680,721
Transfer of accumulated allowance for impairment losses to assets held for sale	(1,141,118)
Derecognition due to significant modifications in loans' contractual terms	(50,128)
Change in present value of the impairment losses	50,838
Foreign exchange differences	29,558
Disposal of impaired loans	(78,652)
Loans written-off during the period	(1,577,291)
Other movements	(10,810)
<b>Balance 30.9.2019</b>	<b>8,880,457</b>

The caption "Other movements" for the current period relates to accumulated allowance for impairment of loans for which the Group, in the context of renegotiation of their terms, participated in debt to equity exchange.

The provisions of Law 3869/2010 on the protection of primary residence, as amended by Article 14 of Law 4346/2015, cease to be in force on 28.2.2019, as defined by Law 4592/2019<sup>1</sup> and from that date onwards the framework for the protection of the primary residence is defined by Law 4605/2019<sup>2</sup>, part 'Z and in particular articles 68 to 84, which was voted on 29.03.2019 and is in force since 30 April 2019 .

In particular, the framework for the protection of the primary residence provides a scheme to subsidize the repayment of housing and corporate loans with a mortgage on the primary residence of individuals. This program pursues a two fold purpose of: (a) providing a framework for the protection of the primary residence of financially weak individuals; and (b) introducing a mechanism for the restructuring of non-performing mortgage and corporate loans, which are secured by a mortgage on primary residence.

<sup>1</sup> Law 4592/2019: "Ratification of the Act of Legislative Content of 31 December 2018 "Extension of the application of exemption of primary residence from liquidation pursuant to Law 3869/2010 (A 130), extension of the application of reduced VAT rates to the islands of Leros, Lesvos, Kos, Samos and Chios, and extension of the application of the "Equivalent Transaction" measure of Law 4551/2018".

<sup>2</sup> Law 4605/2019: "Alignment of Greek legislation with the European Parliament and Council Directive (EU) 2016/943 of 8th June 2016 on the protection of undisclosed "knowhow" and business information (trade secrets) against their unlawful acquisition, use and disclosure (EEL 157 of 15.6.2016). Measures for accelerating the work of the "Ministry of the Economy and other provisions".



Individuals who meet the specified conditions set by the above Law, may apply to join the aforementioned program until 31 December 31, 2019.

The finance lease receivables by duration are as follows:

	30.9.2019	31.12.2018
Up to 1 year	330,053	337,604
From 1 year to 5 years	172,622	247,468
Over 5 years	165,952	161,144
	<b>668,627</b>	<b>746,216</b>
Non accrued finance lease income	(66,463)	(69,543)
<b>Total</b>	<b>602,164</b>	<b>676,673</b>

The net amount of finance lease receivables by duration is analyzed as follows:

	30.9.2019	31.12.2018
Up to 1 year	317,464	325,490
From 1 year to 5 years	145,507	213,856
Over 5 years	139,193	137,327
<b>Total</b>	<b>602,164</b>	<b>676,673</b>

### Loans measured at fair value through profit or loss

	30.9.2019	31.12.2018
<b>Individuals</b>		
Consumer		
- Non-securitized	459	1,152
<b>Total loans to individuals</b>	<b>459</b>	<b>1,152</b>
<b>Corporate:</b>		
Corporate loans		
- Non-securitized	354,152	301,076
- Securitized	17,134	16,232
<b>Total corporate loans</b>	<b>371,286</b>	<b>317,308</b>
<b>Total loans measured at fair value through profit or loss</b>	<b>371,745</b>	<b>318,460</b>

## 13. Trading and investment securities

### i.Trading securities

The following table presents an analysis of the carrying amount of trading portfolio per type of security:

	30.9.2019	31.12.2018
Bonds:		
- Greek Government	22,680	6,669
- Other Governments	4,575	
- Other issuers	416	
Shares:		
- Listed	3,373	1,670
<b>Total</b>	<b>31,044</b>	<b>8,339</b>

**ii. Investment securities**

	30.9.2019	31.12.2018
Securities measured at fair value through other comprehensive income	8,009,223	6,961,822
Securities measured at fair value through profit or loss	47,719	42,794
Securities measured at amortized cost	387,446	
<b>Total</b>	<b>8,444,388</b>	<b>7,004,616</b>

An analysis of investment securities is provided in the following tables per classification category, distinguished per type of security.

**a. Securities measured at fair value through other comprehensive income**

	30.9.2019	31.12.2018
Greek Government:		
- Bonds	4,289,961	2,945,977
- Treasury bills	303,713	814,650
Other Governments:		
- Bonds	1,738,641	1,129,524
- Treasury bills	103,843	200,548
Other issuers' bonds	1,481,988	1,765,355
Shares	91,077	105,768
<b>Total</b>	<b>8,009,223</b>	<b>6,961,822</b>

**b. Securities measured at fair value through profit or loss**

	30.9.2019	31.12.2018
Other Governments' bonds	9,082	9,084
Other issuers' bonds	13,534	13,927
Shares	465	468
Other variable yield securities	24,638	19,315
<b>Total</b>	<b>47,719</b>	<b>42,794</b>

Securities measured at fair value through profit or loss include securities for which it was assessed that their contractual cash flows do not meet the definition of capital and interest, as provided by W9.

**c. Securities measured at amortised cost**

	30.9.2019	31.12.2018
Greek Government		
- Bonds	387,446	
<b>Total</b>	<b>387,446</b>	-

**14. Investment property**

	Land - Buildings	Right-of-use on Land and Buildings	Total
<b>Balance 1.1.2018</b>			
Cost	737,609		737,609
Accumulated depreciation and impairment losses	(184,266)		(184,266)
<b>1.1.2018 - 30.9.2018</b>			
Net book value 1.1.2018	553,343		553,343
Additions	14,173		14,173
Additions from companies consolidated for the first time in period	8,158		8,158
Reclassification from "Property, Plant and Equipment"	933		933
Reclassification to "Assets held for sale"	(45,923)		(45,923)
Reclassification to Investment Property from "Assets available for sale"	21,076		21,076
Disposals / Write-offs	(26,842)		(26,842)
Foreign Exchange differences	(150)		(150)
Depreciation charge for the period	(8,152)		(8,152)
Impairment losses for the period	(2,826)		(2,826)
Net book value 30.9.2018	513,790	-	513,790
<b>Balance 30.9.2018</b>			
Cost	747,264		747,264
Accumulated depreciation and impairment losses	(233,474)		(233,474)
<b>1.10.2018 - 31.12.2018</b>			
Net book value 1.10.2018	513,790		513,790
Additions	7,379		7,379
Additions from companies consolidated for the first time in period	45,936		45,936
Reclassification to "Property, Plant and Equipment"	(1,730)		(1,730)
Reclassification to "Assets available for sale"	(81,652)		(81,652)
Reclassification to "Other Assets"	(268)		(268)
Reclassification to Investment Property from "Assets available for sale"	33,278		33,278
Disposals / Write-offs	(9,121)		(9,121)
Foreign Exchange differences	29		29
Depreciation charge for the period	(2,539)		(2,539)
Impairment losses for the period	(11,941)		(11,941)
Net book value 31.12.2018	493,161		493,161
<b>Balance 31.12.2018</b>			
Cost	639,497		639,497
Accumulated depreciation and impairment losses	(146,336)		(146,336)
<b>1.1.2019 - 30.9.2019</b>			
<b>Impact from the implementation of I.F.R.S. 16</b>		<b>10,319</b>	<b>10,319</b>
Net book value 1.1.2019	493,161	10,319	503,480
Additions	37,195		37,195
Additions from companies consolidated for the first time in period	10,172		10,172
Reclassification from / to "Property, Plant and Equipment"	(730)	446	(284)
Reclassification to "Assets available for sale"	(7,243)		(7,243)
Disposals / Write-offs / Terminations	(23,702)		(23,702)
Foreign Exchange differences	(1,286)		(1,286)
Depreciation charge for the period	(6,502)	(703)	(7,205)
Impairment losses for the period	(310)	(449)	(759)
Net book value 30.9.2019	500,755	9,613	510,368
<b>Balance 30.9.2019</b>			
Cost	652,199	10,765	662,964
Accumulated depreciation and impairment losses	(151,444)	(1,152)	(152,596)

Following the implementation of I.F.R.S. 16, effective from 1.1.2019, the Group recognized a right-of-use on Land and Buildings amounting to € 10,319, related to real estate leases, recognized as investment property, since they are subleased as operating leases by the Group.

The "additions" for the current period as well as the "additions from companies consolidated for the first time in the period"



mainly relate to investment in properties, previously held as collaterals on loans granted by the Group, which were acquired by the Group in the context of its credit risk management framework.

In 2018, an impairment loss amounting to € 14,767 was recognized, in order for the carrying amount of the investment properties not to exceed its recoverable amount as at 31.12.2018, as estimated by certified appraisals. The impairment amount was included in "Other Expenses" of the Income Statement.

## 15. Property, plant and equipment

	Land and Buildings	Leasehold improvements	Equipment	Right-of-use on fixed assets	Total
<b>Balance 1.1.2018</b>					
Cost	1,051,956	3,366	444,650		1,499,972
Accumulated depreciation and impairment losses	(382,076)	(2,839)	(381,224)		(766,139)
<b>1.1.2018 - 30.9.2018</b>					
Net book value 1.1.2018	669,880	527	63,426		733,833
Additions	5,533	84	21,342		26,959
Disposals / Write-offs	(472)		(140)		(612)
Reclassification to "Investment Property"	(933)				(933)
Reclassification internally in "Property, plant and equipment"	(2,660)	(55)	2,715		-
Reclassification to "Other Assets"	(2,937)				(2,937)
Reclassification to "Assets held for sale"	(3,003)		(35)		(3,038)
Foreign exchange differences	(92)	9	(10)		(93)
Depreciation charge for the period	(13,852)	(169)	(13,040)		(27,061)
Net book value 30.9.2018	<b>651,464</b>	<b>396</b>	<b>74,258</b>		<b>726,118</b>
<b>Balance 30.9.2018</b>					
Cost	1,040,890	3,230	458,674		1,502,794
Accumulated depreciation and impairment losses	(389,426)	(2,834)	(384,416)		(776,676)
<b>1.10.2018 - 31.12.2018</b>					
Net book value 1.10.2018	651,464	396	74,258		726,118
Additions	4,940	3	16,473		21,416
Disposals / Write-offs	(340)		(677)		(1,017)
Reclassification from "Investment Property"	1,730				1,730
Reclassification internally in "Property, Plant and Equipment"	22	(2)	(20)		-
Reclassification to "Other Assets"	4				4
Reclassification to "Assets held for sale"	(1,953)		(28)		(1,981)
Foreign exchange differences	359	6	11		376
Depreciation charge for the period	(4,780)	(52)	(4,611)		(9,443)
Impairment losses for the period	(2,540)				(2,540)
Net book value 31.12.2018	<b>648,906</b>	<b>351</b>	<b>85,406</b>		<b>734,663</b>
<b>Balance 31.12.2018</b>					
Cost	896,655	3,237	471,635		1,371,527
Accumulated depreciation and impairment losses	(247,749)	(2,886)	(386,229)		(636,864)
<b>1.1.2019 - 30.9.2019</b>					
<b>Impact from the implementation of I.F.R.S. 16</b>		<b>(351)</b>		<b>157,871</b>	<b>157,520</b>
Net book value 1.1.2019	648,906	-	85,406	157,871	892,183
Additions	7,544		24,512	17,154	49,210
Disposals / Write-offs / Terminations	(810)		(72)	(2,915)	(3,797)
Reclassification from / to "Investment Property"	730			(446)	284
Reclassification from / to "Other Assets"	(1,386)				(1,386)
Reclassification to "Assets held for sale"			(94)	(3,973)	(4,067)
Reclassification from Rights of use to other PPE			165	(165)	-
Foreign exchange differences	(135)		(165)	(427)	(727)
Depreciation charge for the period	(13,609)		(14,702)	(24,490)	(52,801)
Impairment losses for the period				(643)	(643)
Net book value 30.9.2019	<b>641,240</b>	<b>-</b>	<b>95,050</b>	<b>141,966</b>	<b>878,256</b>
<b>Balance 30.9.2019</b>					
Cost	914,120		495,952	171,528	1,581,600
Accumulated depreciation and impairment losses	(272,880)		(400,902)	(29,562)	(703,344)



Following the implementation of the new accounting standard, I.F.R.S. 16, effective from 1.1.2019, the Group recognized a Right-of-use on fixed assets amounting to € 157,871, out of which an amount of € 146,810 relates to real estate leases. Additionally, due to the implementation of I.F.R.S. 16, existing leases of € 351, which according to the former accounting standard were recognized as finance leases and were included in the "Leasehold improvements" category, were reclassified to the "Right-of-use on fixed assets" and included in the amount of € 157,871.

In 2018, an impairment loss on property of € 2,540 was recognized in "Other Expenses".

## 16. Goodwill and other intangible assets

	Software	Other intangible	Total
<b>Balance 1.1.2018</b>			
Cost	685,756	141,486	827,242
Accumulated amortization and impairment losses	(358,162)	(79,271)	(437,433)
<b>1.1.2018 - 30.9.2018</b>			
Net book value 1.1.2018	327,594	62,215	389,809
Additions	70,551	2	70,553
Disposals / Write-offs	(206)		(206)
Foreign exchange differences	245	3	248
Amortization charge for the period	(26,642)	(13,720)	(40,362)
Impairment loss for the period	(5,071)		(5,071)
Net book value 30.9.2018	<b>366,471</b>	<b>48,500</b>	<b>414,971</b>
<b>Balance 30.9.2018</b>			
Cost	756,256	141,488	897,744
Accumulated amortization and impairment losses	(389,785)	(92,988)	(482,773)
<b>1.10.2018 - 31.12.2018</b>			
Net book value 1.10.2018	366,471	48,500	414,971
Additions	33,634		33,634
Foreign exchange differences	(33)	(2)	(35)
Amortization charge for the period	(9,905)	(4,572)	(14,477)
Net book value 31.12.2018	<b>390,167</b>	<b>43,926</b>	<b>434,093</b>
<b>Balance 31.12.2018</b>			
Cost	787,082	141,487	928,569
Accumulated amortization and impairment losses	(396,915)	(97,561)	(494,476)
<b>1.1.2019 - 30.9.2019</b>			
Net book value 1.1.2019	390,167	43,926	434,093
Additions	91,060		91,060
Disposals / Write-offs	(405)		(405)
Foreign exchange differences	(105)		(105)
Amortization charge for the period	(35,445)	(11,797)	(47,242)
Net book value 30.9.2019	<b>445,272</b>	<b>32,129</b>	<b>477,401</b>
<b>Balance 30.9.2019</b>			
Cost	877,288	141,485	1,018,773
Accumulated amortization and impairment losses	(432,016)	(109,356)	(541,372)

Current period's additions, mainly concern acquisitions of rights-of-use for computer applications.

In year 2018, an impairment loss on intangible assets of € 5,071 was recognized. This amount was recorded in "Other Expenses".



## LIABILITIES

### 17. Due to banks

	30.9.2019	31.12.2018
Deposits:		
- Current accounts	100,715	37,456
- Term deposits:		
Central Banks	3,168,273	3,378,847
Other credit institutions	133,973	26,095
Cash collateral for derivative margin account and repurchase agreements	52,052	68,858
Sale and repurchase agreements (repos)	5,855,005	6,421,829
Borrowing funds	555,958	518,021
Deposits on demand:		
- Other credit institutions	2,759	5,253
<b>Total</b>	<b>9,868,735</b>	<b>10,456,359</b>

In June 2016, the European Central Bank carried out a new program of targeted long term refinancing operations (TLTRO-II) with a four-year duration. The Bank participates in this program with an amount of € 3,100,000.

The decrease noted in “Due to Banks” is mainly due to the repayment of funding to the Emergency Liquidity Assistance (ELA) of the Bank of Greece and the reduction of sale and repurchase agreements. The change is mainly linked with the inflow of customers’ deposits.

The caption “Borrowing funds” mainly includes Group’s liabilities to multilateral development Banks.

### 18. Debt securities in issue and other borrowed funds

#### i. Covered bonds<sup>1</sup>

On 6.12.2017 and on 18.5.2018 the Bank issued bonds of nominal value € 1 billion for each of the issuances which were collateralized with mortgage loans of € 2.2 billion with maturities on 23.1.2021 and on 23.10.2019 respectively, and bear an interest rate of 3 months Euribor plus margin of 1.65% each, under its € 8 billion Direct Issuance Global Covered Bond Program II. With an amendment made on 5.6.2019 the spread of these bonds is set at 0.5% from 23.7.2019 and the maturity date of the bonds issued on 18.5.2018 is postponed to 23.1.2021 from 23.10.2019. These bonds are used as collateral in financing operations and are not included in the caption “Debt securities in issue and other borrowed funds” as they are held by the Bank.

Moreover, the Bank issued on 25.1.2018 with settlement date 5.2.2018 a covered bond of nominal value € 500 million under its € 8 billion Direct Issuance Global Covered Bond Program I which was collateralized with mortgage loans of € 0.7 billion, having a 5-year tenor, with maturity on 5.2.2023, bearing a fixed annual interest rate of 2.5% and 2.75% yield to maturity.

On 16.5.2019 the group subsidiary Alpha Bank Romania S.A. issued a covered bond of nominal value € 200 million under the € 1 billion International Direct Covered Bond issuance Program, with maturity on 16.5.2024 and bearing a six-month Euribor interest rate plus a 1.5% margin.

<sup>1</sup> Financial disclosures regarding covered bond issues, as determined by the 2620/28.8.2009 directive of Bank of Greece are published at the Bank’s website.





The following table presents the movement of covered bonds:

<b>Balance 1.1.2019</b>	<b>511,843</b>
<b>Changes for the period 1.1 - 30.9.2019</b>	
New securitization / Capitalized costs	196,906
Maturities / Repayments	(12,500)
Change in the fair value due to hedging	1,284
Accrued interest	11,984
<b>Balance 30.9.2019</b>	<b>709,517</b>

The following tables present additional information for the above mentioned issues:

#### a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Bank A.E.	Euro	3m Euribor+0.50%	23.1.2021	1,000,000	1,000,000
Alpha Bank A.E.	Euro	3m Euribor+0.50%	23.1.2021	1,000,000	1,000,000
<b>Total</b>				<b>2,000,000</b>	<b>2,000,000</b>

#### b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Bank A.E.	Euro	2,5%	5.2.2023	500,000	500,000
Alpha Bank Romania S.A.	Euro	6m Euribor+1,5%	16.5.2024	200,000	
<b>Total</b>				<b>700,000</b>	<b>500,000</b>

#### ii. Secured Note Program

On 22.11.2018 the Bank issued covered bonds of nominal value of € 1.05 billion, collateralized with mortgage loans with maturity date on 25.10.2020 and bearing an interest rate corresponding to three months Euribor plus a margin of 1.8%. These bonds are used as collateral in financing operations and are not included in the caption "Debt securities in issue and other borrowed funds" as they are held by the Bank.

The following table presents additional information for the above mentioned issues:

#### Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal values	
				30.9.2019	31.12.2018
Alpha Bank A.E.	Euro	3m Euribor+1.8%	25.10.2020	1,050,000	1,050,000
<b>Total</b>				<b>1,050,000</b>	<b>1,050,000</b>

#### iii. Senior debt securities

<b>Balance 1.1.2019</b>	<b>6,178</b>
<b>Changes for the period 1.1 - 30.9.2019</b>	
Maturities / Repayments	(5,086)
Accrued interest	235
<b>Balance 30.9.2019</b>	<b>1,327</b>



The following table presents additional information for the above mentioned issues:

#### Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Bank A.E.	Euro	2.50%	20.6.2022	350	350
Alpha Bank A.E.	Euro	2.50%	20.6.2022	1,345	1,345
Alpha Bank A.E.	Euro	Linked to interest rate index	26.2.2019		5,000
<b>Total</b>				<b>1,695</b>	<b>6,695</b>

#### iv. Borrowed funds from the securitization of shipping loans

<b>Balance 1.1.2019</b>	<b>268,277</b>
<b>Changes for the period 1.1 – 30.9.2019</b>	
Maturities / Repayments	(113,536)
Accrued interest	8,259
Foreign exchange differences	10,705
<b>Balance 30.9.2019</b>	<b>173,705</b>

The Bank has proceeded to a shipping loan securitization transaction, transferring the respective shipping loans to the fully consolidated Special Purpose Entity, Alpha Shipping Finance Ltd, which raised funding from third parties.

The amount owed by the Group to third parties as at 30.09.2019, amounted to € 174 million.

The following table presents additional information for the above mentioned issues:

#### Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Shipping Finance Ltd	USD	1m USD Libor+2.25%	20.9.2022	10,465	13,529
Alpha Shipping Finance Ltd	USD	3m USD Libor+2.25%	20.9.2022	163,051	254,040
<b>Total</b>				<b>173,516</b>	<b>267,569</b>

#### v. Debt securities from the securitization of corporate (SME) loans

<b>Balance 1.1.2019</b>	<b>156,384</b>
<b>Changes for the period 1.1 - 30.9.2019</b>	
Maturities / Repayments	(157,134)
Accrued interest	1,169
<b>Balance 30.9.2019</b>	<b>419</b>

The Bank has proceeded with the securitization of SME's loans, transferring the respective loans to the fully consolidated special purpose entity, Proodos Designated Activity Company (D.A.C.), which in turn raised funding from third parties and from the Bank, through the issuance of debt securities. The amount owed by the Group to third parties as at 30.09.2019, amounted to € 419. The aforementioned debt securities were repaid on 23.10.2019.



The following tables present additional information for the above mentioned issues:

#### a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Proodos DAC - Class B	Euro	3m Euribor+2,5%, minimum 0%	23.1.2040	100,000	100,000
Alpha Proodos DAC - Class C	Euro	3m Euribor+3%, minimum 0%	23.1.2040	220,000	220,000
<b>Total</b>				<b>320,000</b>	<b>320,000</b>

#### b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Proodos DAC - Class A1	Euro	3m Euribor+2%, minimum 0%	23.1.2040	554	122,389
Alpha Proodos DAC - Class A2	Euro	3m Euribor+2%, minimum 0%	23.1.2040	111	24,478
Alpha Proodos DAC - Class A3	Euro	3m Euribor+2%, minimum 0%	23.1.2040	44	9,791
<b>Total</b>				<b>709</b>	<b>156,658</b>

#### vi. Liabilities from the securitization of other loans

Liabilities arising from the securitization of consumer loans, corporate loans, credit cards and leasing are not included in "Debt securities in issue and other borrowed funds" since these securities of nominal value € 3,854,200 have been issued by special purpose entities and are held by the Bank.

Moreover, during the first semester of 2019, the Bank proceeded with the securitization of a bond loan. The aforementioned bond loan was transferred to the special purpose company Alpha Quantum DAC and the bond of nominal value of € 306,864 that was issued through the securitization is not included in the caption "Debt securities in issue and other borrowed funds" as it is held by the Bank.

The following table presents additional information for the above mentioned issues:

#### Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Katanalotika Plc LDN - CLASS A	Euro	3m Euribor +0.4%, minimum 0%	17.12.2029	540,000	912,000
Katanalotika Plc LDN - CLASS Z	Euro	3m Euribor +1%, minimum 0%	17.12.2029	360,000	608,000
Epihiro Plc LDN - CLASS A	Euro	6m Euribor +0.3%, minimum 0%	20.1.2035	785,600	785,600
Epihiro Plc LDN - CLASS B	Euro	6m Euribor, minimum 0%	20.1.2035	807,800	807,800
Pisti 2010-1 Plc LDN - CLASS A	Euro	2.50%	24.2.2026	369,300	369,300
Pisti 2010-1 Plc LDN - CLASS B	Euro	1m Euribor, minimum 0%	24.2.2026	216,900	216,900
Irida Plc LDN - CLASS A	Euro	3m Euribor +0.3%, minimum 0%	3.1.2039	261,100	261,100
Irida Plc LDN - CLASS B	Euro	3m Euribor, minimum 0%	3.1.2039	213,700	213,700
Alpha Quantum DAC	Euro	6m Euribor+4,5%	15.11.2023	299,800	
<b>Total</b>				<b>3,854,200</b>	<b>4,174,400</b>

#### vii. Subordinated debt (Lower Tier II, Upper Tier II)

<b>Balance 1.1.2019</b>	<b>652</b>
<b>Changes for the period 1.1 – 30.9.2019</b>	
Maturities / Repayments	(6)
Accrued interest	6
<b>Balance 30.9.2019</b>	<b>652</b>



The following table presents additional information for the above mentioned issues:

### Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2019	31.12.2018
Alpha Bank A.E.	Euro	3m Euribor+1.5%	Indefinite	650	650
<b>Total</b>				<b>650</b>	<b>650</b>

<b>Total of debt securities in issue and other borrowed funds, not held by the Group, as at 30.9.2019</b>	<b>885,620</b>
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## 19. Provisions

	30.9.2019	31.12.2018
Insurance	380,868	313,685
Provisions to cover credit risk and other provisions	237,065	213,701
<b>Total</b>	<b>617,933</b>	<b>527,386</b>

### a. Insurance provisions

	30.9.2019	31.12.2018
<b>Life insurance</b>		
Mathematical reserves	380,621	313,281
Outstanding claim reserves	247	404
<b>Total</b>	<b>380,868</b>	<b>313,685</b>

### b. Provisions to cover credit risk and other provisions

<b>Balance 1.1.2018</b>	<b>279,925</b>
<b>Changes for the period 1.1 - 30.9.2018</b>	
Provisions to cover credit risk relating to off-balance sheet items (note 7)	(21,968)
Used provision for Alpha Bank S.A. voluntary separation scheme	(38,566)
Other provisions	3,454
Other provisions used	(4,963)
Foreign exchange differences	1,586
<b>Balance 30.9.2018</b>	<b>219,468</b>
<b>Changes for the period 1.10 - 31.12.2018</b>	
Provisions to cover credit risk relating to off-balance sheet items	4,011
Used provision for Alpha Bank S.A. voluntary separation scheme	(5,730)
Other provisions	1,297
Other provisions used	(717)
Reclassification to "Assets held for sale"	(131)
Foreign exchange differences	(4,497)
<b>Balance 31.12.2018</b>	<b>213,701</b>
<b>Changes for the period 1.1 - 30.9.2019</b>	
Provisions to cover credit risk relating to off-balance sheet items (note 7)	11,707
Settlement of separation scheme provision balance not expected to be used	(49,845)
Other provisions used	(5,171)
Provision for Alpha Bank S.A. 2019 voluntary separation scheme	42,312
Other provisions	24,242
Foreign exchange differences	119
<b>Balance 30.9.2019</b>	<b>237,065</b>



The caption “Other Expenses”, includes the amounts of other provisions, while the caption “Impairment losses and provisions to cover credit risk” of Income Statement, includes the provisions to cover credit risk relating to off- balance sheet items.

The balance of provisions to cover credit risk from off balance sheet items as at 30.9.2019 amounts to € 103,961 (31.12.2018: € 92,221) of which an amount of € 5,486 (31.12.2018: € 4,407) relates to provisions of undrawn credit limits, and an amount of € 98,475 (31.12.2018: € 87,815) relates to provisions for Letters of Guarantee and Letters of Credit.

The balance of other provisions as at 30.9.2019 , amounts to € 133,104 (31.12.2018: € 121.479) of which:

- An amount of € 30,058 (31.12.2018: € 30,575) relates to pending legal cases.
- An amount of € 21,686 relates to the Bank's assessment during the nine month period of 2019 for the dismissal of the appeals submitted in previous years regarding obligation for contributions to an insurance fund. On 30.6.2019, the Bank had recognized an amount of € 10,683, which relates to the principal obligation, since in case of a lump sum payment and under the provisions of Law 4611/2019, a 100% discount is offered on the additional charges over the overdue payment of the principal obligation. These provisions have not been finalized and the Bank recognized, as at 30.9.2019 a provision on the amount of the additional charges.
- An amount of € 51,471 (31.12.2018: € 59,004) relates to provision of the voluntary separation schemes. The Bank, via a circular issued on 6 September 2019, announced to its personnel that a Voluntary Separation Scheme (the “Scheme”) is enacted for the full-time employees that wish to leave active duty, under specific terms and conditions. The Scheme was effective from 9.9.2019 up until 20.9.2019 and the Bank, following assessment of the applications for participation in the Scheme, maintains the right to decide, at its sole discretion, for the acceptance or not of the applications submitted. Based on the above, a provision of € 42,312 has been recognized as of 30.9.2019 which corresponds to the cost for the applications that the Bank has accepted as at the reporting date.



## EQUITY

### 20. Share capital and Retained earnings

#### a. Share capital

On 30.9.2019, the Bank's share capital amounts to € 463,110 divided into 1,543,699,381 ordinary, registered, voting, paperless shares of the Bank with a nominal value of € 0.30 each.

#### b. Retained earnings

Since there were no distributable profits for the fiscal year 2018, in accordance with the provisions of article 159 of Codified Law 4548/2018, the Bank's Ordinary General Meeting of Shareholders held on 28.6.2019, decided the non distribution of dividend to the ordinary shareholders of the Bank.

### 21. Hybrid securities

	30.9.2019	31.12.2018
Perpetual with 1st call option on 18.2.2015 and per year	15,232	15,232
Securities held by Group companies	(125)	(125)
<b>Total</b>	<b>15,107</b>	<b>15,107</b>



## ADDITIONAL INFORMATION

### 22. Contingent liabilities and commitments

#### a. Legal issues

The Group, in the ordinary course of business, is a defendant in claims from customers and other legal proceedings. In the context of managing the operational risk events and on the basis of the accounting principles followed, the Group records all the filed lawsuits or similar actions performed by third parties against the Group and considers any possibility of their success, as well as the possible outcome.

For cases where there is a significant probability of a negative outcome, and the result may be reliably estimated, the Group creates a provision that is included in the Balance Sheet under the caption "Provisions". On 30.9.2019 the amount of the provision stood at € 30,058 (31.12.2018: € 30,575).

For cases where according to their progress and the evaluation of the Legal department on September 30, 2019, a negative outcome is not probable or the potential outflow cannot be estimated reliably due to the complexity of the cases, the time period that they are expected to last and the uncertainty of their outcome, the Group has not recognized a provision. As of 30.9.2019 total amount of the legal claims against the Group for the above cases amounts to € 363,399 (31.12.2018: € 347,895).

According to the estimations of the legal department, the ultimate disposition of these claims and lawsuits is not expected to have a material effect on the consolidated balance sheet or the income statement of the Group.

#### b. Tax issues

Alpha Bank has been audited by the tax authorities for the years up to and including 2010. The years 2011 and 2012 are considered as closed as per the Circular of the Ministry of Finance 1208/20.12.2017 of the Independent Public Revenue Authority. For the years 2011 up to 2018 the Bank has obtained a tax certificate with no qualifications, according to the provisions of the article 82 of Law 2238/1994 and the article 65A of Law 4174/2013. On 17.10.2019, the Independent Authority for Public Revenue, delivered to the Bank a partial tax audit mandate for the year 2014. Former Emporiki Bank has been audited by the tax authorities for the years up to and including 2008. Years 2009-2012 are considered as closed, in accordance with the Circular of the Ministry of Finance 1208/20.12.2017 of the Independent Public Revenue Authority. For the years 2011 up to 2013 former Emporiki Bank has obtained a tax certificate with no qualifications.

The Bank's branch in London has been audited by the tax authorities up to and including the years 2016.

On 2.6.2015, the merger by absorption of Diners Club of Greece A.E.P.P. was completed. The company has been audited by the tax authorities for the years up to and including 2010. Years 2011 and 2012 are considered as closed, in accordance with the Circular of the Ministry of Finance 1208/20.12.2017 of the Independent Public Revenue Authority. For the tax years 2011 up to 2013, it has obtained a tax certificate with no qualifications.

Based on Circular of the Ministry of Finance 1006/5.1.2016 there is no exemption from a tax audit by the tax authorities to those entities that have been tax audited by the independent auditor and have received an unqualified tax audit certificate. Therefore, the tax authorities may reaudit the tax books.

Additional taxes and penalties may be imposed for the unaudited years due to the fact that some expenses may not be recognized as deductible by the tax authorities, the amounts of which cannot accurately be determined.



The Group's subsidiaries have been audited by the tax authorities up to and including the year indicated in the table below:

Name	Year
<b>Banks</b>	
1. Alpha Bank London Ltd (voluntary settlement of tax obligation)	2016
2. Alpha Bank Cyprus Ltd (tax audit is in progress for the years 2013 - 2014)	2012
3. Alpha Bank Romania S.A.	2006
4. Alpha Bank Albania SH.A.	2012
<b>Leasing companies</b>	
1. Alpha Leasing A.E.**	2012
2. Alpha Leasing Romania IFN S.A.	2014
3. ABC Factors A.E.**	2012
<b>Investment Banking</b>	
1. Alpha Finance A.E.P.E.Y.**/**	2012
2. SSIF Alpha Finance Romania S.A.	2002
3. Alpha Ventures A.E. **/**	2012
4. Alpha A.E. Ventures Capital Management - AKES **/**	2012
5. Emporiki Ventures Capital Developed Markets Ltd	2007
6. Emporiki Ventures Capital Emerging Markets Ltd	2008
<b>Asset Management</b>	
1. Alpha Asset Management A.E.D.A.K.**/**	2012
2. ABL Independent Financial Advisers Ltd (voluntary settlement of tax obligation)	2015
<b>Insurance</b>	
1. Alpha Insurance Agents A.E.**/**	2012
2. Alpha Insurance Brokers Srl	2005
3. Alphalife A.A.E.Z.**/** (tax audit is in progress for the year 2015)	2012
<b>Real Estate and Hotel</b>	
1. Alpha Astika Akinita A.E.**	2012
2. Emporiki Development and Real Estate Management A.E.	2012
3. Alpha Real Estate Management and Investments S.A. (former Ionian Holdings)	2012
4. Alpha Real Estate Bulgaria E.O.O.D. (commencement of operation 2007)	*
5. Chardash Trading E.O.O.D. (commencement of operation 2006)	*
6. Alpha Real Estate Services Srl (commencement of operation 1998)	*
7. Alpha Investment Property Attikis A.E. (commencement of operation 2012)**	2012
8. Alpha Investment Property Attikis II A.E. (commencement of operation 2012)	2012
9. Alpha Investment Property I A.E. (commencement of operation 2012-the entity has been transferred on 11.6.2019)	2012
10. AGI-RRE Participations 1 Srl (commencement of operation 2010)	*
11. Stockfort Ltd (commencement of operation 2010)	*
12. Romfelt Real Estate S.A. (commencement of operation 1991)	*
13. AGI-RRE Zeus Srl (commencement of operation 2012)	*
14. AGI-RRE Poseidon Srl (commencement of operation 2012)	*
15. AGI-RRE Hera Srl (commencement of operation 2012)	*
16. Alpha Real Estate Services LLC (commencement of operation 2010)	*
17. AGI-BRE Participations 2 E.O.O.D. (commencement of operation 2012)	*
18. AGI-BRE Participations 2BG E.O.O.D. (commencement of operation 2012)	*
19. AGI-BRE Participations 3 E.O.O.D. (commencement of operation 2012)	*
20. AGI-BRE Participations 4 E.O.O.D. (commencement of operation 2012)	*

\* These companies have not been audited by the tax authorities since the commencement of their operations.

\*\* These companies received tax certificate for the years 2011 to 2017 without any qualification whereas the years up to and including 2012 are considered as closed in accordance with the Circular of the Ministry of Finance 1208/2017 (note 9).

\*\*\* These companies have been audited by the tax authorities up to and including 2009 in accordance with Law 3888/2010 which relates to voluntary settlement for the unaudited tax years.





Name	Year
21. APE Fixed Assets A.E.**/**	2012
22. SC Cordia Residence Srl	2013
23. AGI-RRE Cleopatra Srl (commencement of operation 2014)	*
24. AGI-RRE Hermes Srl (commencement of operation 2014)	*
25. SC Carmel Residential Srl (commencement of operation 2013)	*
26. Alpha Investment Property Neas Kifissias A.E. (commencement of operation 2014)	*
27. Alpha Investment Property Kallirois A.E. (commencement of operation 2014)	*
28. Alpha Investment Property Livadias A.E. (commencement of operation 2014)	*
29. Alpha Investment Property Kefalariou A.E. (commencement of operation 2015)	*
30. Alpha Investment Property Neas Erythreas A.E. (commencement of operation 2015)	*
31. Alpha Investment Property Chanion A.E. (commencement of operation 2011-the entity has been transferred on 31.5.2019)	*
32. Alpha Investment Property Kallitheas A.E. (commencement of operation 2017)	*
33. Asmita Gardens Srl	2010
34. AGI-Cypr Alaminos Ltd (commencement of operation 2014)	*
35. AGI-Cypr Tochni Ltd (commencement of operation 2014)	*
36. AGI-Cypr Mazotos Ltd (commencement of operation 2014)	*
37. Ashtrom Residents Srl (commencement of operation 2006)	*
38. Cubic Center Development S.A. (commencement of operation 2010)	*
39. AGI-SRE Participations 1 D.O.O. (commencement of operation 2016)	*
40. Alpha Investment Property Spaton A.E. (commencement of operation 2017)	*
41. TH Top Hotels Srl (commencement of operation 2009)	*
42. Kestrel Enterprise E.O.O.D. (commencement of operation 2013)	*****
43. Beroe Real Estate E.O.O.D. (commencement of operation 2018)	*
44. Alpha Investment Property Irakliou A.E. (commencement of operation 2018)	*
45. Alpha Investment Property Gi I A.E. (commencement of operation 2018)	*
46. AGI-Cypr Property 1 Ltd (commencement of operation 2018-the entity was transferred on 19.3.2019)	*
47. AGI-Cypr Property 2 Ltd (commencement of operation 2018)	*
48. AGI-Cypr Property 3 Ltd (commencement of operation 2018)	*
49. AGI-Cypr Property 4 Ltd (commencement of operation 2018)	*
50. AGI-Cypr Property 5 Ltd (commencement of operation 2018)	*
51. AGI-Cypr Property 6 Ltd (commencement of operation 2018)	*
52. AGI-Cypr Property 7 Ltd (commencement of operation 2018)	*
53. AGI-Cypr Property 8 Ltd (commencement of operation 2018)	*
54. AGI-Cypr Property 9 Ltd (commencement of operation 2018)	*
55. AGI-Cypr Property 10 Ltd (commencement of operation 2018)	*
56. AGI-Cypr Property 11 Ltd (commencement of operation 2018)	*
57. AGI-Cypr Property 12 Ltd (commencement of operation 2018)	*
58. AGI-Cypr Property 13 Ltd (commencement of operation 2018)	*
59. AGI-Cypr Property 14 Ltd (commencement of operation 2018)	*
60. AGI-Cypr Property 15 Ltd (commencement of operation 2018)	*
61. AGI-Cypr Property 16 Ltd (commencement of operation 2018)	*
62. AGI-Cypr Property 17 Ltd (commencement of operation 2018)	*
63. AGI-Cypr Property 18 Ltd (commencement of operation 2018)	*
64. AGI-Cypr Property 19 Ltd (commencement of operation 2018)	*
65. AGI-Cypr Property 20 Ltd (commencement of operation 2018)	*

\* These companies have not been audited by the tax authorities since the commencement of their operations.

\*\* These companies received tax certificate for the years 2011 to 2017 without any qualification whereas the years up to and including 2012 are considered as closed in accordance with the Circular of the Ministry of Finance 1208/2017 (note 9).

\*\*\* These companies have been audited by the tax authorities up to and including 2009 in accordance with Law 3888/2010 which relates to voluntary settlement for the unaudited tax years.

\*\*\*\* These companies became Group companies during 2017 as per bankruptcy procedures and since then have not been audited by tax authorities.



Name	Year
66. AGI-Cypr Property 21 Ltd (commencement of operation 2018)	*
67. AGI-Cypr Property 22 Ltd (commencement of operation 2018)	*
68. AGI-Cypr Property 23 Ltd (commencement of operation 2018)	*
69. AGI-Cypr Property 24 Ltd (commencement of operation 2018)	*
70. AGI-Cypr RES Pafos Ltd (commencement of operation 2018)	*
71. AGI-Cypr P&F Nicosia Ltd (commencement of operation 2018)	*
72. AGI-Cypr RES Nicosia Ltd (commencement of operation 2018)	*
73. AGI-Cypr P&F Limassol Ltd (commencement of operation 2018)	*
74. ABC RE L1 Ltd (commencement of operation 2018)	*
75. ABC RE L2 Ltd (commencement of operation 2018)	*
76. ABC RE L3 Ltd (commencement of operation 2018)	*
77. ABC RE P1 Ltd (commencement of operation 2018)	*
78. ABC RE P2 Ltd (commencement of operation 2018)	*
79. ABC RE P3 Ltd (commencement of operation 2018)	*
80. ABC RE P4 Ltd (commencement of operation 2018)	*
81. ABC RE P5 Ltd (commencement of operation 2018)	*
82. ABC RE P&F Limassol Ltd (commencement of operation 2018)	*
83. Kitma Holdings Ltd (commencement of operation 2006 - the entity has been transferred on 8.2.2019)	*
84. Vic City Srl (the entity has been transferred on 8.2.2019)	*
85. AGI-Cypr Property 25 Ltd (commencement of operation 2019)	*
86. AGI-Cypr Property 26 Ltd (commencement of operation 2019)	*
87. ABC RE COM Pafos Ltd (commencement of operation 2019)	*
88. ABC RE RES Larnaca Ltd (commencement of operation 2019)	*
89. AGI-Cypr P&F Pafos Ltd (commencement of operation 2019)	*
90. AGI-Cypr Property 27 Ltd (commencement of operation 2019)	*
91. ABC RE L4 Ltd (commencement of operation 2019)	*
92. ABC RE L5 Ltd (commencement of operation 2019)	*
93. AGI-Cypr Property 28 Ltd (commencement of operation 2019)	*
94. AGI-Cypr Property 29 Ltd (commencement of operation 2019)	*
95. AGI-Cypr Property 30 Ltd (commencement of operation 2019)	*
96. AGI-Cypr COM Pafos Ltd (commencement of operation 2019)	*
97. AIP Industrial Assets Athens S.M.S.A. (commencement of operation 2019)	*
98. AGI-Cypr Property 31 Ltd (commencement of operation 2019)	*
99. AGI-Cypr Property 32 Ltd (commencement of operation 2019)	*
100. AGI-Cypr Property 33 Ltd (commencement of operation 2019)	*
101. AGI-Cypr Property 34 Ltd (commencement of operation 2019)	*
102. Alpha Group Real Estate Ltd (commencement of operation 2019)	*
103. ABC RE P&F Pafos Ltd (commencement of operation 2019)	*
104. ABC RE P&F Nicosia Ltd (commencement of operation 2019)	*
105. ABC RE RES Nicosia Ltd (commencement of operation 2019)	*
106. Fierton Ltd (commencement of operation 2019)	*
107. AIP Industrial Assets Rog S.M.S.A. (commencement of operation 2019)	*
108. AIP Attica Residential Assets I S.M.S.A. (commencement of operation 2019)	*
109. AIP Thessaloniki Residential Assets S.M.S.A. (commencement of operation 2019)	*
110. AIP Cretan Residential Assets S.M.S.A. (commencement of operation 2019)	*
111. AIP Aegean Residential Assets S.M.S.A. (commencement of operation 2019)	*
112. AIP Ionian Residential Assets S.M.S.A. (commencement of operation 2019)	*
113. AIP Attica Commercial Assets S.M.S.A. (commencement of operation 2019)	*
114. AIP Thessaloniki Commercial Assets S.M.S.A. (commencement of operation 2019)	*
115. AIP Commercial Assets Rog S.M.S.A. (commencement of operation 2019)	*

\* These companies have not been audited by the tax authorities since the commencement of their operations.



Name	Year
116. AIP Attica Retail Assets I S.M.S.A. (commencement of operation 2019)	*
117. AIP Attica Retail Assets II S.M.S.A. (commencement of operation 2019)	*
118. AIP Attica Residential Assets II S.M.S.A. (commencement of operation 2019)	*
119. AIP Retail Assets Rog S.M.S.A. (commencement of operation 2019)	*
120. AIP Land II S.M.S.A. (commencement of operation 2019)	*
121. ABC RE P6 Ltd (commencement of operation 2019)	*
122. AGI-Cypré Property 35 Ltd (commencement of operation 2019)	*
123. AGI-Cypré P&F Larnaca Ltd (commencement of operation 2019)	*
124. AGI-Cypré Property 37 Ltd (commencement of operation 2019)	*
125. AGI-Cypré RES Ammochostos Ltd (commencement of operation 2019)	*
126. AGI-Cypré Property 36 Ltd (commencement of operation 2019)	*
<b>Special purpose and holding entities</b>	
1. Alpha Credit Group Plc (voluntary settlement of tax obligation)	2015
2. Alpha Group Jersey Ltd	****
3. Alpha Group Investments Ltd (commencement of operation 2006)	*
4. Ionian Equity Participations Ltd (commencement of operation 2006)	2009
5. AGI-BRE Participations 1 Ltd (commencement of operation 2009)	*
6. AGI-RRE Participations 1 Ltd (commencement of operation 2009)	*
7. Alpha Group Ltd (commencement of operation 2012)	*
8. Katanalotika Plc (voluntary settlement of tax obligation)	2016
9. Epihiro Plc (voluntary settlement of tax obligation)	2016
10. Irida Plc (voluntary settlement of tax obligation)	2016
11. Pisti 2010 - 1 Plc (voluntary settlement of tax obligation)	2016
12. Alpha Shipping Finance Ltd (voluntary settlement of tax obligation)	2016
13. Alpha Proodos DAC (commencement of operation 2016)	*
14. Alpha Quantum DAC (commencement of operation 2019)	*
15. AGI-RRE Athena Ltd (commencement of operation 2011)	*
16. AGI-RRE Poseidon Ltd (commencement of operation 2012)	*
17. AGI-RRE Hera Ltd (commencement of operation 2012)	*
18. Umera Ltd (commencement of operation 2012)	*
19. AGI-BRE Participations 2 Ltd (commencement of operation 2011)	*
20. AGI-BRE Participations 3 Ltd (commencement of operation 2011)	*
21. AGI-BRE Participations 4 Ltd (commencement of operation 2010)	*
22. AGI-RRE Ares Ltd (commencement of operation 2010)	*
23. AGI-RRE Venus Ltd (commencement of operation 2012)	*
24. AGI-RRE Artemis Ltd (commencement of operation 2012)	*
25. AGI-BRE Participations 5 Ltd (commencement of operation 2012)	*
26. AGI-RRE Cleopatra Ltd (commencement of operation 2013)	*
27. AGI-RRE Hermes Ltd (commencement of operation 2013)	*
28. AGI-RRE Arsinoe Ltd (commencement of operation 2013)	*
29. AGI-SRE Ariadni Ltd (commencement of operation 2013)	*
30. Zerelda Ltd (commencement of operation 2012)	*
31. AGI-Cypré Evagoras Ltd (commencement of operation 2014)	*
32. AGI-Cypré Tersefanou Ltd (commencement of operation 2014)	*
33. AGI-Cypré Ermis Ltd (commencement of operation 2014)	*
34. AGI-SRE Participations 1 Ltd (commencement of operation 2016)	*
<b>Other companies</b>	
1. Alpha Bank London Nominees Ltd	****
2. Alpha Trustees Ltd (commencement of operation 2002)	*

\* These companies have not been audited by the tax authorities since the commencement of their operations.

\*\*\*\* These companies are not subject to a tax audit.



Name	Year
3. Kafe Alpha A.E.** / ***	2012
4. Alpha Supporting Services A.E.** / ***	2012
5. Real Car Rental A.E.** / ***	2012
6. Emporiki Management A.E.***	2012
7. Alpha Bank Notification Services A.E. (commencement of operation 2015)	*

### c. Leases

#### The Group as lessee

The Group's minimum future lease payments are:

	31.12.2018
- less than one year	39,723
- between one and five years	89,757
- over five years	98,503
<b>Total</b>	<b>227,983</b>

It is noted that there are differences in the way the minimum future lease payments as at 31.12.2018 were calculated compared to the calculation of the lease liabilities recognized as at 1.1.2019 in accordance with the new I.F.R.S. 16 "Leases", which are mainly the following:

- Future rentals are discounted,
- The following estimations and assumptions are used:
  - Assumptions are made regarding the extension of the duration of leases for which the lease contract expires within 2019 and for which the Group will renew the contract, excluding lease properties for which the leased contract expires in 2019 and the Group considers that will not be renewed.
  - In cases where the lease contract includes a term relating to increase in the lease, this increase is applied on the future leases on each adjustment date.

#### The Group as lessor

The Group's receivables from leases relate to leases of buildings to third parties.

The minimum future lease fees are:

	30.9.2019	31.12.2018
- less than one year	8,086	15,084
- between one and five years	23,364	44,349
- over five years	15,637	38,829
<b>Total</b>	<b>47,087</b>	<b>98,262</b>

### d. Off balance sheet liabilities

The Group as part to its normal operations, is bound by contractual commitments, that in the future may result in changes to its asset structure. These commitments are monitored in off balance sheet accounts and relate to letters of credit, letters of guarantee, and liabilities from undrawn credit commitments and credit limits approved.

Letters of credit are used to facilitate trading activities and relate to the financing of contractual agreements for the transfer

\* These companies have not been audited by the tax authorities since the commencement of their operations.

\*\* These companies received tax certificate for the years 2011 to 2017 without any qualification whereas the years up to and including 2012 are considered as closed in accordance with the Circular of the Ministry of Finance 1208/2017 (note 9).

\*\*\* These companies have been audited by the tax authorities up to and including 2009 in accordance with Law 3888/2010 which relates to voluntary settlement for the unaudited tax years.



of goods domestically or abroad, by undertaking the direct payment to the third party with which the Group's client has an agreement. Letters of credit, as well as letters of guarantee, are commitments under specific terms and are issued by the Group for the purpose of ensuring that its clients will fulfill the terms of their contractual obligations.

In addition, contingent liabilities for the Group arise from undrawn loan commitments and credit limits that will be extended unless certain conditions are not met by the counterparties.

The outstanding balances are as follows:

	30.9.2019	31.12.2018
Letters of credit	30,532	30,695
Letters of guarantee and other guarantees	3,391,105	3,372,091
Undrawn credit commitments and credit limits	4,028,583	3,532,935

The Group measures the expected credit losses for all the undrawn loan agreements and letters of credit / letters of guarantee, which are included in the caption "Provisions".

The balance of the abovementioned expected credit losses amount to € 103,960 (31.12.2018: € 92,221) on 30.9.2019 (note 19).

The Bank has also committed to contribute an amount up to € 35 (31.12.2018: € 56) for the share capital of the joint venture Alpha TANEOK AKES.

#### e. Assets pledged

Assets pledged, as at 30.9.2019 and 31.12.2018 are analyzed as follows:

- Cash and balances with Central Banks
  - i. On 30.9.2019 pledged deposits with Central Banks that relate to the obligation of Group banking subsidiaries to maintain deposits in Central Banks based on percentages determined by the respective country amounted to € 674,824 (31.12.2018: € 722,351). Out of this amount, the pledged deposit of the Bank relates to the average amount that the Bank is obliged to keep with the Bank of Greece for the period from 18.9.2019 to 29.10.2019, and amounts to € 348,528 (31.12.2018: € 347,652). On 30.9.2019 pledged deposit of the Bank amounted to € 347,710 (31.12.2018: € 300,411).
  - ii. Additionally, as at 31.12.2018, placements of € 93,000 had been pledged to Central Banks for the purpose of participating in main refinancing operations.
- Due to banks
  - i. Placements amounting to € 212,293 (31.12.2018: € 213,074) relate to guarantees provided in favor of the Greek State.
  - ii. Placements amounting to € 1,568,892 (31.12.2018: € 1,059,932) relate to guarantees for derivative transactions and other repurchase agreements (repos).
  - iii. Placements amounting to € 19,782 (31.12.2018: € 28,707) which have been provided for Letter of Credit or Guarantee Letters issued by the Bank in order to facilitate clients' imports.
  - iv. Placements of € 12,568 (31.12.2018: € 9,493) have been provided to the Resolution Fund as irrevocable payment commitment, as part of the 2016 up to and including 2019 contribution. This commitment must be fully covered by collateral exclusively in cash, as decided by Single Resolution Board.
  - v. Placements of € 29,653 (31.12.2018: € 35,230) have been given as collateral for the issuance of bonds with nominal value of € 3,750,000 (31.12.2018: € 3,550,000), out of which an amount of € 3,050,000 (31.12.2018: € 3,050,000) are held by the Bank, as mentioned below under "Loans and advances to customers".
- Loans and advances to customers:
  - i. Loans with a carrying amount of € 1,852,307 (31.12.2018: € 3,700,146) have been pledged to Central Banks for liquidity purposes.



- ii. Corporate, consumer and credit cards loans with a carrying amount of € 3,250,183 (31.12.2018: € 3,323,619) have been securitized for the issuance of the Group's Special Purpose Entities' bonds with a nominal value of € 3,854,200 (31.12.2018: € 4,174,400) which are held by the Bank and out of which bonds with total nominal value of € 1,715,800 (31.12.2018: € 2,541,700) have been given as collateral for repurchase agreements (repos).
  - iii. A carrying amount of € 370,439 (31.12.2018: € 498,904), which relates to shipping loans, have been securitized and the bonds issued by the Group's Special Purpose Entity that are held by third parties amounting to € 173,516 (31.12.2018: € 267,589) on 30.9.2019. For the aforementioned transaction, an amount of € 13,673 (31.12.2018: € 21,720) which relates to "Due from Banks", has been given as collateral.
  - iv. A carrying amount € 291,517 (31.12.2018: € 401,803) which relates to corporate loans, has been securitized for the issuance of the Group's Special Purpose Entities' bonds which amounts to € 320,710 (31.12.2018: € 476,658) on 30.9.2019, out of which € 320,000 (31.12.2018: € 320,000) are held by the Bank. Out of the amount that is held by the Bank, an amount of € 299,799 (31.12.2018: € 100,000) has been given as collateral for repurchase agreements (repos). An amount of € 41,393 (31.12.2018: € 93,644) which relates to "Due from Banks" has been given as collateral for the aforementioned transaction.
  - v. A carrying amount of € 15,871 (31.12.2018: € 22,791) relating to corporate loans, has been pledged for other loan facilities.
  - vi. A pool of mortgage loans of a carrying amount of € 4,792,212 (31.12.2018: € 4,624,700) has been used as collateral in the following covered bond issuance programs: Covered Bonds Program I and II, the Bank's Secured Note Program, as well as in the Direct Issuance Covered Bond Program of Alpha Bank Romania. On 30.9.2019 the nominal value of the above bonds amounted to € 3,750,000 (31.12.2018: € 3,550,000), out of which an amount of € 3,050,000 (31.12.2018: € 3,050,000) is held by the Bank, while an amount of € 1,252,000 (31.12.2018: € 3,050,000) has been used as collateral in the context of repurchase agreements (repos).
- Investment securities:
    - i. A carrying amount of € 3,767,353 (31.12.2018: € 2,243,399) relates to Greek Government bonds issues that has been given as collateral for repurchase agreements (repo).
    - ii. A carrying amount of € 181,489 (31.12.2018: € 641,059) relates to Greek Government Treasury Bills out of which a carrying amount of € 179,793 (31.12.2018: € 640,163) has been given as collateral for repurchase agreements (repo), while a carrying amount of € 1,696 (31.12.2018: € 896) has been given as collateral for customers' derivatives transactions. Moreover, Greek Government treasury bills of nominal value of € 870,000 (31.12.2018: 400,000) were received as collateral for derivative transactions with the Greek State, and an amount of nominal value of € 207,000 (31.12.2018: € 400,000) has been given as collateral for repurchase agreements (repo).
    - iii. A carrying amount of € 134,821 (31.12.2018: € 423,660) relates to securities issued by the European Financial Stability Facility (EFSF), which has been pledged to Central Banks with the purpose to participate in main refinancing operations.
    - iv. A carrying amount of € 337,128 (31.12.2018: € 0) of other government securities, has been given as a collateral of repo agreements.
    - v. A carrying amount of € 1,366,128 (31.12.2018: € 1,380,748) which relates to bonds issued by Other Governments and other issuers, have been given to Central Banks for liquidity purposes. In addition, bonds with a nominal value of € 1,112,950 (31.12.2018 € 464,700) and fair value of € 1,175,106 (31.12.2018 € 504,012) relate to securities received as collateral in the context of reverse repo agreements of which fair value of € 770,160 (31.12.2018: € 504,012) have been given as collateral to Central Banks for the purpose of obtaining liquidity, and fair value of € 64,038 (31.12.2018: € 0) have been given as collateral in the context of repo agreements.
    - vi. A carrying amount of € 4,365 (31.12.2018: € 13,219) which relates to other government bonds, has been pledged as a collateral for repurchase agreements (repos) to Central Banks.



## 23. Group Consolidated Companies

The consolidated financial statements, apart from the parent company Alpha Bank include the following entities:

### a. Subsidiaries

Name	Country	Group's ownership interest %	
		30.9.2019	31.12.2018
<b>Banks</b>			
1 Alpha Bank London Ltd	United Kingdom	100.00	100.00
2 Alpha Bank Cyprus Ltd (notes 31a, b, l, o, ae, ah, al, ao, ap, ar, as)	Cyprus	100.00	100.00
3 Alpha Bank Romania S.A.	Romania	99.92	99.92
4 Alpha Bank Albania SH.A.	Albania	100.00	100.00
<b>Leasing companies</b>			
1 Alpha Leasing A.E.	Greece	100.00	100.00
2 Alpha Leasing Romania IFN S.A.	Romania	100.00	100.00
3 ABC Factors A.E.	Greece	100.00	100.00
<b>Investment Banking</b>			
1 Alpha Finance A.E.P.E.Y.	Greece	100.00	100.00
2 SSIF Alpha Finance Romania S.A.	Romania	99.98	99.98
3 Alpha Ventures A.E.	Greece	100.00	100.00
4 Alpha A.E. Ventures Capital Management - AKES	Greece	100.00	100.00
5 Emporiki Ventures Capital Developed Markets Ltd	Cyprus	100.00	100.00
6 Emporiki Ventures Capital Emerging Markets Ltd	Cyprus	100.00	100.00
<b>Asset Management</b>			
1 Alpha Asset Management A.E.D.A.K.	Greece	100.00	100.00
2 ABL Independent Financial Advisers Ltd	United Kingdom	100.00	100.00
<b>Insurance</b>			
1 Alpha Insurance Agents A.E.	Greece	100.00	100.00
2 Alpha Insurance Brokers Srl	Romania	100.00	100.00
3 Alphalife A.A.E.Z.	Greece	100.00	100.00
<b>Real Estate and Hotel</b>			
1 Alpha Astika Akinita A.E.	Greece	93.17	93.17
2 Emporiki Development and Real Estate Management A.E. (note 31m)	Greece	100.00	100.00
3 Alpha Real Estate Management and Investments S.A.	Greece	100.00	100.00
4 Alpha Real Estate Bulgaria E.O.O.D.	Bulgaria	93.17	93.17
5 Chardash Trading E.O.O.D.	Bulgaria	93.17	93.17
6 Alpha Real Estate Services Srl	Romania	93.17	93.17
7 Alpha Investment Property Attikis A.E. (note 31au)	Greece	100.00	100.00
8 Alpha Investment Property Attikis II A.E.	Greece	100.00	100.00
9 Alpha Investment Property I A.E. (notes 31p, u)	Greece		100.00
10 AGI-RRE Participations 1 Srl	Romania	100.00	100.00
11 Stockfort Ltd	Cyprus	100.00	100.00
12 SC Romfelt Real Estate S.A.	Romania	99.99	99.99
13 AGI-RRE Zeus Srl	Romania	100.00	100.00
14 AGI-RRE Poseidon Srl	Romania	100.00	100.00
15 AGI-RRE Hera Srl	Romania	100.00	100.00
16 Alpha Real Estate Services LLC	Cyprus	93.17	93.17
17 AGI-BRE Participations 2 E.O.O.D. (note 31v)	Bulgaria	100.00	100.00
18 AGI-BRE Participations 2BG E.O.O.D.	Bulgaria	100.00	100.00
19 AGI-BRE Participations 3 E.O.O.D.	Bulgaria	100.00	100.00
20 AGI-BRE Participations 4 E.O.O.D.	Bulgaria	100.00	100.00





Name	Country	Group's ownership interest %		
		30.9.2019	31.12.2018	
21	APE Fixed Assets A.E.	Greece	72.20	72.20
22	SC Cordia Residence Srl	Romania	100.00	100.00
23	AGI-RRE Cleopatra Srl	Romania	100.00	100.00
24	AGI-RRE Hermes Srl (note 31ak)	Romania		100.00
25	SC Carmel Residential Srl	Romania	100.00	100.00
26	Alpha Investment Property Neas Kifissias A.E.	Greece	100.00	100.00
27	Alpha Investment Property Kallirois A.E.	Greece	100.00	100.00
28	AGI-Cypre Alaminos Ltd	Cyprus	100.00	100.00
29	AGI-Cypre Tochni Ltd	Cyprus	100.00	100.00
30	AGI-Cypre Mazotos Ltd	Cyprus	100.00	100.00
31	Alpha Investment Property Livadias A.E.	Greece	100.00	100.00
32	Asmita Gardens Srl (note 31aq)	Romania	100.00	100.00
33	Alpha Investment Property Kefalariou A.E.	Greece	54.17	54.17
34	Ashtrom Residents Srl (note 31at)	Romania	100.00	100.00
35	Cubic Center Development S.A.	Romania	100.00	100.00
33	Alpha Investment Property Neas Erythraias A.E. (note 31h)	Greece	100.00	100.00
37	Alpha Investment Property Chanion A.E. (note 31t)	Greece		100.00
38	AGI-SRE Participations 1 D.O.O.	Serbia	100.00	100.00
39	Alpha Investment Property Spaton A.E.	Greece	100.00	100.00
40	TH Top Hotels Srl	Romania	97.50	97.50
41	Alpha Investment Property Kallitheas A.E. (note 31q)	Greece	100.00	100.00
42	Kestrel Enterprise E.O.O.D.	Bulgaria	100.00	100.00
43	Beroe Real Estate E.O.O.D.	Bulgaria	100.00	100.00
44	Alpha Investment Property Irakleiou A.E.	Greece	100.00	100.00
45	Alpha Investment Property GI I A.E.	Greece	100.00	100.00
46	AGI-Cypre Property 1 Ltd (note 31k)	Cyprus		100.00
47	AGI-Cypre Property 2 Ltd	Cyprus	100.00	100.00
48	AGI-Cypre Property 3 Ltd	Cyprus	100.00	100.00
49	AGI-Cypre Property 4 Ltd	Cyprus	100.00	100.00
50	AGI-Cypre Property 5 Ltd	Cyprus	100.00	100.00
51	AGI-Cypre Property 6 Ltd	Cyprus	100.00	100.00
52	AGI-Cypre Property 8 Ltd	Cyprus	100.00	100.00
53	Kitma Holdings Ltd (note 31e)	Cyprus		100.00
54	Vic City Srl (note 31e)	Romania		99.95
55	AGI-Cypre Property 7 Ltd	Cyprus	100.00	100.00
56	ABC RE L1 Ltd	Cyprus	100.00	100.00
57	AGI-Cypre Property 9 Ltd	Cyprus	100.00	100.00
58	AGI-Cypre Property 10 Ltd	Cyprus	100.00	100.00
59	AGI-Cypre Property 11 Ltd	Cyprus	100.00	100.00
60	AGI-Cypre Property 12 Ltd	Cyprus	100.00	100.00
61	AGI-Cypre Property 13 Ltd	Cyprus	100.00	100.00
62	AGI-Cypre Property 14 Ltd	Cyprus	100.00	100.00
63	AGI-Cypre Property 15 Ltd	Cyprus	100.00	100.00
64	AGI-Cypre Property 16 Ltd	Cyprus	100.00	100.00
65	AGI-Cypre Property 17 Ltd	Cyprus	100.00	100.00
66	AGI-Cypre Property 18 Ltd	Cyprus	100.00	100.00
67	AGI-Cypre Property 19 Ltd	Cyprus	100.00	100.00
68	AGI-Cypre Property 20 Ltd	Cyprus	100.00	100.00
69	AGI-Cypre Res Pafos Ltd (note 31z)	Cyprus	100.00	100.00
70	AGI-Cypre P&F Nicosia Ltd (note 31x)	Cyprus	100.00	100.00





Name	Country	Group's ownership interest %		
		30.9.2019	31.12.2018	
71	ABC RE P1 Ltd	Cyprus	100.00	100.00
72	ABC RE P2 Ltd	Cyprus	100.00	100.00
73	ABC RE P3 Ltd	Cyprus	100.00	100.00
74	ABC RE L2 Ltd	Cyprus	100.00	100.00
75	ABC RE P4 Ltd	Cyprus	100.00	100.00
76	AGI-Cypre RES Nicosia Ltd (notes 31g, r, x)	Cyprus	100.00	100.00
77	AGI-Cypre P&F Limassol Ltd (note 31s)	Cyprus	100.00	100.00
78	AGI-Cypre Property 21 Ltd (note 31y)	Cyprus	100.00	100.00
79	AGI-Cypre Property 22 Ltd (note 31s)	Cyprus	100.00	100.00
80	AGI-Cypre Property 23 Ltd (note 31n)	Cyprus	100.00	100.00
81	AGI-Cypre Property 24 Ltd (note 31g)	Cyprus	100.00	100.00
82	ABC RE L3 Ltd	Cyprus	100.00	100.00
83	ABC RE P5 Ltd	Cyprus	100.00	100.00
84	ABC RE P&F Limassol Ltd	Cyprus	100.00	100.00
85	AGI-Cypre Property 25 Ltd (note 31c)	Cyprus	100.00	
86	AGI-Cypre Property 26 Ltd (notes 31c, s)	Cyprus	100.00	
87	ABC RE COM Pafos Ltd (note 31a)	Cyprus	100.00	
88	ABC RE RES Larnaca Ltd (note 31b)	Cyprus	100.00	
89	AGI-Cypre P&F Pafos Ltd (notes 31d, z, ab)	Cyprus	100.00	
90	AGI-Cypre Property 27 Ltd (note 31i)	Cyprus	100.00	
91	ABC RE L4 Ltd (note 31l)	Cyprus	100.00	
92	ABC RE L5 Ltd (note 31o)	Cyprus	100.00	
93	AGI-Cypre Property 28 Ltd (notes 31w, z)	Cyprus	100.00	
94	AGI-Cypre Property 29 Ltd (notes 31w, z)	Cyprus	100.00	
95	AGI-Cypre Property 30 Ltd (notes 31w, z)	Cyprus	100.00	
96	AGI-Cypre COM Pafos Ltd (notes 31w, z)	Cyprus	100.00	
97	AIP Industrial Assets Athens S.M.S.A. (note 31ac)	Greece	100.00	
98	AGI-Cypre Property 31 Ltd (note 31aa)	Cyprus	100.00	
99	AGI-Cypre Property 32 Ltd (note 31aa)	Cyprus	100.00	
100	AGI-Cypre Property 33 Ltd (note 31ae)	Cyprus	100.00	
101	AGI-Cypre Property 34 Ltd (note 31ae)	Cyprus	100.00	
102	Alpha Group Real Estate Ltd (notes 31ad, ai, am)	Cyprus	100.00	
103	ABC RE P&F Pafos Ltd (notes 31ah, ap)	Cyprus	100.00	
104	ABC RE P&F Nicosia Ltd (note 31ah)	Cyprus	100.00	
105	ABC RE RES Nicosia Ltd (note 31ah)	Cyprus	100.00	
106	Fierton Ltd (note 31ag)	Cyprus	100.00	
107	AIP Industrial Assets Rog S.M.S.A. (notes 31ai, am)	Greece	100.00	
108	AIP Attica Residential Assets I S.M.S.A. (notes 31ai, am)	Greece	100.00	
109	AIP Thessaloniki Residential Assets S.M.S.A. (notes 31ai, am)	Greece	100.00	
110	AIP Cretan Residential Assets S.M.S.A. (notes 31ai, am)	Greece	100.00	
111	AIP Aegean Residential Assets S.M.S.A. (notes 31ai, am)	Greece	100.00	
112	AIP Ionian Residential Assets S.M.S.A. (notes 31ai, am)	Greece	100.00	
113	AIP Attica Commercial Assets S.M.S.A. (notes 31ai, am)	Greece	100.00	
114	AIP Thessaloniki Commercial Assets S.M.S.A. (notes 31ai, am)	Greece	100.00	
115	AIP Commercial Assets Rog S.M.S.A. (notes 31ai, am)	Greece	100.00	
116	AIP Attica Retail Assets I S.M.S.A. (notes 31ai, am)	Greece	100.00	
117	AIP Attica Retail Assets II S.M.S.A. (notes 31ai, am)	Greece	100.00	
118	AIP Attica Residential Assets II S.M.S.A. (notes 31ai, am)	Greece	100.00	
119	AIP Retail Assets Rog S.M.S.A. (notes 31ai, am)	Greece	100.00	
120	AIP Land II S.M.S.A. (notes 31ai, am)	Greece	100.00	



Name	Country	Group's ownership interest %		
		30.9.2019	31.12.2018	
121	ABC RE P6 Ltd (note 31al)	Cyprus	100.00	
122	AGI-Cypre Property 35 Ltd (note 31al)	Cyprus	100.00	
123	AGI-Cypre P&F Larnaca Ltd (note 31al)	Cyprus	100.00	
124	AGI-Cypre Property 37 Ltd (note 31an)	Cyprus	100.00	
125	AGI-Cypre RES Ammochostos Ltd (note 31an)	Cyprus	100.00	
126	AGI-Cypre Property 36 Ltd (note 31ao)	Cyprus	100.00	
	<b>Special purpose and holding entities</b>			
1	Alpha Credit Group Plc	United Kingdom	100.00	100.00
2	Alpha Group Jersey Ltd (note 31at)	Jersey	100.00	100.00
3	Alpha Group Investments Ltd (notes 31f, h, q, ac, ad, af, aj, au)	Cyprus	100.00	100.00
4	Ionian Equity Participations Ltd	Cyprus	100.00	100.00
5	AGI-BRE Participations 1 Ltd (note 31af)	Cyprus	100.00	100.00
6	AGI-RRE Participations 1 Ltd (note 31aq)	Cyprus	100.00	100.00
7	Alpha Group Ltd	Cyprus	100.00	100.00
8	Katanalotika Plc	United Kingdom		
9	Epihiro Plc	United Kingdom		
10	Irida Plc	United Kingdom		
11	Pisti 2010-1 Plc	United Kingdom		
12	Alpha Shipping Finance Ltd	United Kingdom		
13	Alpha Proodos DAC	Ireland		
14	Alpha Quantum DAC	Ireland		
15	AGI-RRE Athena Ltd (note 31af)	Cyprus	100.00	100.00
16	AGI-RRE Poseidon Ltd	Cyprus	100.00	100.00
17	AGI-RRE Hera Ltd (note 31af)	Cyprus	100.00	100.00
18	Umera Ltd	Cyprus	100.00	100.00
19	AGI-BRE Participations 2 Ltd (notes 31v, af)	Cyprus	100.00	100.00
20	AGI-BRE Participations 3 Ltd	Cyprus	100.00	100.00
21	AGI-BRE Participations 4 Ltd	Cyprus	100.00	100.00
22	AGI-RRE Ares Ltd (note 31af)	Cyprus	100.00	100.00
23	AGI-RRE Venus Ltd (note 31af)	Cyprus	100.00	100.00
24	AGI-RRE Artemis Ltd	Cyprus	100.00	100.00
25	AGI-BRE Participations 5 Ltd	Cyprus	100.00	100.00
26	AGI-RRE Cleopatra Ltd (note 31af)	Cyprus	100.00	100.00
27	AGI-RRE Hermes Ltd (note 31af)	Cyprus	100.00	100.00
28	AGI-RRE Arsinoe Ltd (note 31af)	Cyprus	100.00	100.00
29	AGI-SRE Ariadni Ltd (note 31af)	Cyprus	100.00	100.00
30	Zerelda Ltd (note 31af)	Cyprus	100.00	100.00
31	AGI-Cypre Evagoras Ltd	Cyprus	100.00	100.00
32	AGI-Cypre Tersefanou Ltd	Cyprus	100.00	100.00
33	AGI-Cypre Ermis Ltd (notes 31c, d, g, i, n, r, s, w, x, y, z, aa, ab, ag, an)	Cyprus	100.00	100.00
34	AGI-SRE Participations 1 Ltd (note 31af)	Cyprus	100.00	100.00
	<b>Other companies</b>			
1	Alpha Bank London Nominees Ltd	United Kingdom	100.00	100.00
2	Alpha Trustees Ltd (note 31af)	Cyprus	100.00	100.00
3	Kafe Alpha A.E.	Greece	100.00	100.00
4	Alpha Supporting Services A.E.	Greece	100.00	100.00
5	Real Car Rental A.E.	Greece	100.00	100.00
6	Emporiki Management S.A.	Greece	100.00	100.00
7	Alpha Bank Notification Services A.E.	Greece	100.00	100.00

**b. Joint ventures**

Name	Country	Group's ownership interest %	
		30.9.2019	31.12.2018
1 APE Commercial Property A.E.	Greece	72.20	72.20
2 APE Investment Property A.E.	Greece	71.08	71.08
3 Alpha TANEO AKES	Greece	51.00	51.00
4 Rosequeens Properties Ltd	Cyprus	33.33	33.33
5 Panaræ Saturn LP	Jersey	61.58	61.58
6 Alpha Investment Property Commercial Stores A.E.	Greece	70.00	70.00

**c. Associates**

Name	Country	Group's ownership interest %	
		30.9.2019	31.12.2018
1 AEDEP Thessalias and Stereas Ellados	Greece	50.00	50.00
2 ALC Novelle Investments Ltd	Cyprus	33.33	33.33
3 Banking Information Systems A.E.	Greece	23.77	23.77
4 Propindex AEDA	Greece	35.58	35.58
5 Olganos A.E. (note 31wf)	Greece	30.44	30.44
6 Alpha Investment Property Elaiona A.E. (note 31f)	Greece	50.00	50.00
7 Selonda Aquaculture A.E.G.E.	Greece	21.97	21.97
8 Nireus Aquaculture A.E.	Greece	20.65	20.65
9 Famar S.A.	Luxembourg	47.04	47.04
10 Cepal Holdings A.E.	Greece	38.61	38.61

On subsidiaries the following are noted:

The subsidiary company Stockfort Ltd is a group of companies, that included up to 31.12.2018 the following companies: Sheynovo Offices E.O.O.D., Sheynovo Apartments E.O.O.D., Sheynovo Residence E.O.O.D., Serdica 2009 E.O.O.D. and Pernik Logistics Park E.O.O.D. With the exception of Pernik Logistics Park E.O.O.D., the rest of the four entities of the Group which were classified as assets held of sale since 30.9.2018, were transferred on 19.3.2019 (note 30).

Consolidated financial statements do not include Commercial Bank of London Ltd which is a dormant company and Smelter Medical Systems A.E.B.E., Aris Diomidis Emporiki S.A., Metek S.A. and Flagbright Ltd, which have been fully impaired and are in the process of liquidation.

The Group hedges the foreign exchange risk arising from the net investment in subsidiaries through the use of derivatives in their functional currency.

On Associates and Joint Ventures the following are noted:

Cepal Holdings S.A. is the parent company of a group companies with subsidiaries the companies Cepal Hellas Financial Services Societe Anonyme for the Management of Receivables from Loans and Credits, Kaican Services Ltd and Kaican Hellas S.A.

APE Investment Property is the parent company of a group of companies, in which the subsidiaries SYMET A.E., Astakos Terminal A.E., Akarport A.E. and NA.VI.PE. A.E. are included. Furthermore, Rosequeens Properties Ltd is the parent company of a group of companies where its subsidiary is Rosequeens Properties Srl.

The Group accounts the aforementioned groups under the equity method, based on their consolidated financial statements, except for APE Investment Property A.E., which is classified as assets held for sale and is valued in accordance with I.F.R.S. 5 (note 30).

Finally, it is noted that during the current period the goodwill of € 9,701, which resulted from the acquisition by the Group of 50% of the associate Alpha Investment Property Elaionas A.E. has been fully impaired. This amount is included in the caption " Share of profit / (loss) of associates and joint ventures " of the Interim Consolidated Income Statement.



## 24. Operating segments

(Amounts in million of Euro)

1.1 - 30.9.2019							
	Retail	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Net interest income	514.3	390.2	9.9	87.2	157.5	1.0	1,160.1
Net fee and commission income	83.9	93.1	33.5	13.5	23.1	(0.1)	247.0
Other income	5.2	(1.0)	7.6	249.6	18.4	15.9	295.7
<b>Total income</b>	<b>603.4</b>	<b>482.3</b>	<b>51.0</b>	<b>350.3</b>	<b>199.0</b>	<b>16.8</b>	<b>1,702.8</b>
<b>Total expenses</b>	<b>(445.2)</b>	<b>(133.3)</b>	<b>(26.0)</b>	<b>(20.8)</b>	<b>(152.7)</b>	<b>(45.6)</b>	<b>(823.6)</b>
Impairment losses and provisions to cover credit risk on loans and advances to customers	(435.9)	(241.7)	0.1	(1.1)	(71.4)		(750.0)
Impairment losses on other financial assets			0.6	9.5	0.4		10.5
<b>Profit / (Losses) before income tax</b>	<b>(277.7)</b>	<b>107.3</b>	<b>25.7</b>	<b>337.9</b>	<b>(24.7)</b>	<b>(28.8)</b>	<b>139.7</b>
Income tax							(48.2)
<b>Profit / (Losses) after income tax</b>							<b>91.5</b>
Assets 30.9.2019	21,276.5	15,022.0	1,423.5	13,620.6	8,052.4	3,329.8	62,724.8
Liabilities 30.9.2019	26,147.8	6,991.1	2,523.9	12,226.0	6,127.8	137.3	54,153.9

Losses before income tax of the “Other / Elimination Centre” operating segment, amounting to € 28.8 million, include expenses from eliminations between operating segments amounting to € 5.9 million and unallocated expenses amounting to € 22.9 million. These unallocated figures refer to a) non-recurring items that do not relate to a specific operating segment and therefore cannot be allocated and b) results from activities that do not represent reportable operating segments.

(Amounts in million of Euro)

1.1 - 30.9.2018*							
	Retail	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Net interest income	644.7	455.6	5.9	93.5	147.3	(17.6)	1,329.4
Net fee and commission income	80.0	100.7	33.7	9.3	21.3	(0.2)	244.8
Other income	18.3	(10.5)	3.6	424.9	8.2	(19.1)	425.4
<b>Total income</b>	<b>743.0</b>	<b>545.8</b>	<b>43.2</b>	<b>527.7</b>	<b>176.8</b>	<b>(36.9)</b>	<b>1,999.6</b>
<b>Total expenses</b>	<b>(478.1)</b>	<b>(136.2)</b>	<b>(24.5)</b>	<b>(22.5)</b>	<b>(139.0)</b>	<b>(22.5)</b>	<b>(822.8)</b>
Impairment losses and provisions to cover credit risk on loans and advances to customers	(518.7)	(329.1)		4.7	(176.1)		(1,019.2)
Impairment losses on other financial assets			2.1	4.6	(0.6)		6.1
<b>Profit / (Losses) before income tax</b>	<b>(253.8)</b>	<b>80.5</b>	<b>20.8</b>	<b>514.5</b>	<b>(138.9)</b>	<b>(59.4)</b>	<b>163.7</b>
Income tax							(110.1)
<b>Profit / (Losses) after income tax</b>							<b>53.6</b>
Assets 31.12.2018	22,108.0	14,438.0	434.9	9,979.2	7,950.5	6,096.1	61,006.7
Liabilities 31.12.2018	24,976.2	7,647.5	2,160.1	11,783.6	6,097.7	198.5	52,863.6

Losses before income tax of the “Other / Elimination Centre” operating segment, amounting to € 59.4 million, include expenses from eliminations between operating segments amounting to € 19.2 million and unallocated expenses amounting to € 40.2 million. These unallocated figures refer to a) non-recurring items that do not relate to a specific operating segment and therefore cannot be allocated and b) results from activities that do not represent reportable operating segments.

\* Certain figures of the previous period have been restated, as described in detail in note 32.

**i. Retail Banking**

It includes all individuals (retail banking customers), professionals, small and very small companies operating in Greece and abroad, except for South-Eastern Europe countries.

The Group, through its extended branch network, offers all types of deposit products (deposits / savings accounts, working capital / current accounts, investment facilities / term deposits, Repos, Swaps), loan facilities (mortgages, consumer, corporate loans, letters of guarantee), the debit and credit cards of the above customers and the banking and insurance products provided through the affiliated companies.

**ii. Corporate Banking**

It includes all medium-sized and large companies, companies with international business activities, companies which cooperate with the Corporate Banking Division, as well as shipping companies operating in Greece and abroad except for South Eastern European countries. The Group offers working capital facilities, corporate loans, and letters of guarantee to the abovementioned companies. This sector also includes leasing products which are provided by the Group subsidiary Alpha Leasing A.E. as well as factoring services which are provided by the Group subsidiary ABC Factors A.E.

**iii. Asset Management / Insurance**

It consists of a wide range of asset management services offered through Group's private banking units and its subsidiary, Alpha Asset Management A.E.D.A.K. In addition, it includes income received from the sale of a wide range of insurance products through the subsidiary Alphalife A.A.E.Z.

**iv. Investment Banking / Treasury**

It includes stock exchange, advisory and brokerage services related to capital markets, and also investment banking facilities, which are offered either by the Bank or specialized subsidiaries which operate in the aforementioned services (Alpha Finance A.E.P.E.Y., Alpha Ventures S.A.). It also includes the activities of the Dealing Room in the interbank market (FX Swaps, Bonds, Futures, IRS, Interbank placements, Loans etc.) and in securitizations.

**v. South-Eastern Europe**

It consists of the Group's subsidiaries, which operate in South Eastern Europe.

**vi. Other / Elimination Center**

This segment includes the non-financial activities of the Group, as well as unallocated / one-off income and expenses and intersegment transactions.

Included in the assets of the operating segments "Retail" and "Corporate Banking are non-performing loans of the Bank and of ABC Factors S.A. and Alpha Leasing S.A. which are being managed by the Non Performing Retail and Wholesale Banking Units, based on Bank's internal procedures.

	30.9.2019			31.12.2018		
	Balance before impairment	Accumulated impairments	Balance after impairment	Balance before impairment	Accumulated impairments	Balance after impairment
Mortgages	7,304,104	1,907,187	5,396,917	7,600,991	2,263,042	5,337,949
Consumer Credit Division	3,101,359	1,692,901	1,408,457	3,118,862	1,727,983	1,390,879
Corporate Loans	7,913,939	3,770,361	4,143,578	10,387,296	5,351,417	5,035,879
<b>Total</b>	<b>18,319,402</b>	<b>7,370,449</b>	<b>10,948,953</b>	<b>21,107,149</b>	<b>9,342,442</b>	<b>11,764,707</b>



## 25. Exposure in credit risk from the Greek State

The following table presents the Group's total exposure to Greek State securities

Portfolio	30.9.2019		31.12.2018	
	Nominal value	Carrying amount	Nominal value	Carrying amount
Securities measured at fair value through other comprehensive income	3,830,529	4,593,674	3,820,590	3,760,627
Securities measured at amortized cost	341,400	387,446		
Trading	18,665	22,680	6,858	6,669
<b>Total</b>	<b>4,190,594</b>	<b>5,003,800</b>	<b>3,827,448</b>	<b>3,767,296</b>

The securities issued by public sector entities / organizations amounted to € 36,044 as at 30.9.2019 (31.12.2018: € 67,131).

The Group's exposure to the Greek State from other financial instruments, excluding securities, is depicted in the table below:

### On balance sheet exposures

	Carrying amount	
	30.9.2019	31.12.2018
Derivative financial instruments – assets	789,633	429,309
Derivative financial instruments – liabilities	(38,046)	(36,063)

Derivative financial liabilities to public sector entities / organizations amounted to € 3,646 on 30.9.2019 (31.12.2018: € 7,689).

The Group's exposure in loans to public sector entities / organizations on 30.9.2019 amounted to € 909,407 (31.12.2018: € 836,649). The Group has recognized an accumulated impairment for the above mentioned loans amounting to € 26,443 as at 30.9.2019 (31.12.2018: € 50,759). In addition, the balance of the Group's loans guaranteed by the Greek State (guaranteed either directly by Greek Government or by Common Ministerial Decisions and loans guaranteed by ETEAN) on 30.9.2019 amounted to € 516,684 (31.12.2018: € 542,743). For these loans the Group has recognized an accumulated impairment amounting to € 58,518 as at 30.9.2019 (31.12.2018: € 91,881).

### Off balance sheet exposures

	30.9.2019		31.12.2018	
	Nominal value	Fair value	Nominal value	Fair value
Greek Government Treasury Bills received as guarantee for derivative transactions	870,000	868,956	400,000	399,600

## 26. Disclosures relevant to the fair value of financial instruments

### Fair value of financial instruments measured at amortized cost

	30.9.2019		31.12.2018	
	Fair value	Carrying amount	Fair value	Carrying amount
<b>Financial Assets</b>				
Loans and advances to customers	38,784,010	39,079,260	39,676,490	39,909,859
Securities measured at amortized cost	403,090	387,446		
<b>Financial Liabilities</b>				
Due to customers	39,593,758	39,612,370	38,711,917	38,731,835
Debt securities in issue and other borrowed funds	914,572	885,620	954,417	943,334



The table above presents the fair value of financial instruments measured at amortized cost, as well as their carrying amount.

The fair value of loans and advances to customers measured at amortized cost is estimated using models to discount the contractual future cash flows. The components of the discount rate are the interbank market yield curve, the liquidity premium, the operational cost as well as the expected loss rate. More specifically, for those loans considered as impaired for the purpose of credit risk monitoring and are individually assessed, the model used is incorporating expected future cash flows excluding expected credit loss. For the purpose of the fair value measurement of the impaired loans assessed at product level, capital repayment assumptions are used, after deducting the estimated loss due to credit risk. The interbank market yield curve and liquidity premium comprise the discount rate of impaired loans.

The fair value of deposits is estimated based on the interbank market yield curve, the operational cost and the liquidity premium until their maturity.

The fair value of debt securities in issue is calculated by using market prices, as long as the market is active. In all other cases, the discounted cash flows method is used and all significant variables are based either on observable market data or on a combination of observable and unobservable market data.

The fair value of other financial assets and liabilities which are valued at amortized cost does not differ materially from the respective carrying amount.

#### Hierarchy of financial instruments measured at fair value

	30.9.2019			
	Level 1	Level 2	Level 3	Total fair value
Derivative Financial Assets	2,893	1,168,710	18,749	1,190,352
Trading securities				
- Bonds and Treasury Bills	27,256	415		27,671
- Shares	3,373			3,373
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury Bills	7,747,965	160,811	9,370	7,918,146
- Shares	12,063	36,284	42,730	91,077
Securities measured at fair value through profit or loss				
- Bonds and Treasury Bills	9,082	2,155	11,379	22,616
- Other variable yield securities	24,638			24,638
- Shares			465	465
Loans measured at fair value through profit or loss			371,745	371,745
Derivative Financial Liabilities	50	1,702,686		1,702,736

	31.12.2018			
	Level 1	Level 2	Level 3	Total fair value
Derivative Financial Assets	3,547	704,963	16,663	725,173
Trading securities				
- Bonds and Treasury Bills	6,669			6,669
- Shares	1,670			1,670
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury Bills	6,554,454	292,007	9,593	6,856,054
- Shares	9,796	26,480	69,492	105,768
Securities measured at fair value through profit or loss				
- Bonds and Treasury Bills	9,085	4,410	9,516	23,011
- Other variable yield securities	19,315			19,315
- Shares			468	468
Loans measured at fair value through profit or loss			318,460	318,460
Derivative Financial Liabilities	5	1,147,890		1,147,895



The tables above present the hierarchy levels of financial instruments which are measured at fair value based on inputs used for the fair value measurement.

Securities which are traded in an active market and exchange-traded derivatives are classified as Level 1.

Securities whose fair value is calculated based on non-binding market prices provided by dealers-brokers or on the application of the income approach methodology using interest rates and credit spreads which are observable in the market, are classified as Level 2.

Level 3 classification includes financial instruments whose fair value is estimated using significant unobservable inputs.

The valuation methodology of securities is subject to approval by the Treasury and Balance Sheet Management / Assets – Liabilities Management Committees. It should be noted that for the securities whose fair value is calculated based on market prices, bid prices are considered and daily checks are performed with regards to their change in fair value.

For the fair value estimation of loans measured at fair value through profit and loss, the fair value is estimated by applying the same methodology as described above for the loans and advances measured at amortised cost.

Shares whose fair value is estimated are classified in Level 2 or Level 3, depending on the extent of the contribution of unobservable data in the estimation. The fair value of non listed shares, as well as shares not traded in an active market is determined either based on the Group's share on the issuer's equity, or based on the multiples valuations or based on the Group's estimations relating to the future profitability of the issuer after taking into account the expected growth rate of its operations, as well as the weighted average rate of capital return which is used as a discount rate.

For the valuation of over the counter (OTC) derivatives income approach methodologies are used: discounted cash flow models, option-pricing models or other widely accepted valuation models.

The valuation methodology of derivatives is subject to approval by the Treasury and Balance Sheet Management / Assets – Liabilities Management Committees. Mid prices are used for their valuation since they may be considered as both long and short positions. It is noted that valuations are checked on a daily basis with the respective prices of the counterparty banks in the context of the daily process of provision of collaterals and settlement of derivatives. If the non observable inputs are significant, the fair value that arises is classified as Level 3 or otherwise as Level 2.

Additionally, the Group estimates a Credit Valuation Adjustment by taking into account counterparty credit risk for Derivative Financial Instruments trading in OTC. More specifically, taking into consideration the credit risk, the Group estimates bilateral credit valuation adjustments (BCVA) for the OTC derivatives held on a counterparty level according to netting and collateral agreements in force. BCVA is calculated across all counterparties with a material effect on the respective derivative fair values taking into consideration the default probability of both the counterparty and Alpha Group, the impact of first to default, the expected OTC derivative exposure and loss given default of the counterparty and of Alpha Group and the specific characteristics of netting and collateral agreements in force.

Collateral is simulated along with the derivative portfolio exposure over the life of the related instruments. Calculations performed depend largely on observable market data. Market quoted counterparty and group CDS spreads are used in order to derive the respective probability of default, a market standard recovery rate is assumed for developed market counterparties, correlations between market data are taken into account and a series of simulations is performed to model the portfolio exposure over the life of the related instruments. In the absence of quoted market data, counterparty and loss given default are provided by the group's internal credit and facility rating systems for the valuation of collaterals and credit worthiness.

A breakdown of BCVA across counterparty sectors and credit quality (as defined for presentation purposes of the table "Credit quality of Loans per I.F.R.S. 9 Stage") is given below:

	30.9.2019	31.12.2018
<b>Category of counterparty</b>		
Enterprises	(3,694)	(4,841)
Governments	(28,420)	(25,249)





	30.9.2019	31.12.2018
<b>Hierarchy of counterparty by credit quality</b>		
Strong	(2,742)	(371)
Satisfactory	(28,897)	(25,246)
Default	(476)	(4,473)

The table below is specifically provided for Level 3 fair value methodologies:

30.9.2019				
	Total fair value	Fair value	Valuation method	Significant non-observable inputs
Derivative Financial Assets	18,749	1,624	Discounted cash flows with interest being the underlying instruments, taking into account the credit risk of the counterparty	The probability of default and loss given default of the counterparty (BCVA adjustment) calculated using an internal model
			Discounted cash flows with interest rates being the underlying instrument	Valuation of reserve adequacy for payment of hybrid securities' dividends
		17,125	Option discounting taking into account the credit risk of the counterparty	Credit spread
Bonds measured at fair value through other comprehensive income	9,370	9,370	Discounted cash flows with estimation of bond yields	Bond yields
Shares measured at fair value through other comprehensive income	42,730	42,730	Discounted cash flows / Based on Multiples valuation / WACC	Future profitability of the issuer, expected growth / Valuation indices
Bonds measured at fair value through profit or loss	11,379	11,379	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price / Credit spread
Shares measured at fair value through profit or loss	465	465	Discounted cash flows / Based on Multiples valuation / Price of forthcoming transaction	Future profitability of the issuer, expected growth / Valuation indices
Loans measured at fair value through profit or loss	371,745	371,745	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk and operational cost	Expected loss and cash flows from counterparty' credit risk

31.12.2018				
	Total fair value	Fair value	Valuation method	Significant non-observable inputs
Derivative Financial Assets	16,663	2,098	Discounted cash flows with interest being the underlying instruments, taking into account the credit risk of the counterparty	The probability of default and loss given default of the counterparty (BCVA adjustment) calculated using an internal model
			Option discounting taking into account the credit risk of the counterparty	Credit spread
Bonds measured at fair value through other comprehensive income	9,593	9,593	Based on issuer price / Discounted cash flows with estimation of bond yields	Issuer price / bond yields
Shares measured at fair value through other comprehensive income	69,492	69,492	Discounted cash flows / Based on Group's share in issuer's equity / Multiples valuation	Future profitability of the issuer, expected growth / Issuer's equity / Valuation indices
Bonds measured at fair value through profit or loss	9,516	9,516	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price / Credit spread
Shares measured at fair value through profit or loss	468	468	Discounted cash flows / Based on Group's share in issuer's equity / Multiples valuation / Price of forthcoming transaction	Future profitability of the issuer, expected growth / Issuer's equity / Valuation indices
Loans measured at fair value through profit or loss	318,460	318,460	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk	Expected loss and cash flows from counterparty' credit risk



The Group recognizes the transfer between fair value hierarchy Levels at the end of each reporting period. Within the year, € 2,026 of Greek corporate bonds were transferred from Level 2 to Level 1, as the liquidity margin (bid-ask spread) moved within the limit set for the characterization of market as active.

A reconciliation of the movement of financial instruments measured at fair value in Level 3 is depicted in the table below:

30.9.2019				
	Assets			
	Securities measured at fair value through other comprehensive income	Securities measured at fair value through profit or loss	Loans measured at fair value through profit or loss	Derivative financial assets
<b>Balance 1.1.2019</b>	<b>79,085</b>	<b>9,984</b>	<b>318,460</b>	<b>16,663</b>
Total gain / (loss) recognized in Income Statement:	465	2,020	9,473	3,024
- Interest	417	685	9,511	
- Gains less losses on financial transactions	33	1,335	(38)	3,024
- Impairment losses	15			
Total gain / (loss) recognized in Equity - Reserves	151			
Total gain / (loss) recognized in Equity - Retained Earnings	(20,645)			
Purchases / Disbursements	210	324	58,833	
Sales		(481)		
Repayments	(3,932)		(15,021)	(231)
Settlements				(707)
Transfer out Level 3 to Level 1		(3)		
Transfer out Level 3 to Level 2	(3,234)			
<b>Balance 30.9.2019</b>	<b>52,100</b>	<b>11,844</b>	<b>371,745</b>	<b>18,749</b>

Amounts included in the income statement and relate to financial instruments included in the balance sheet at the end of the period 1.1 - 30.9.2019	465	1,683	11,162	3,024
- Interest	417	685	9,395	
- Gains less losses on financial transactions	33	998	1,767	3,024
- Impairment losses	15			



31.12.2018				
	Assets			
	Securities measured at fair value through other comprehensive income	Securities measured at fair value through profit or loss	Loans measured at fair value through profit or loss	Derivative financial assets
<b>Balance 1.1.2018</b>	<b>67,499</b>	<b>8,153</b>	<b>381,741</b>	<b>26,555</b>
Total gain / (loss) recognized in Income Statement:	672	1,243	(16,443)	1,311
- Interest	432	684	10,591	253
- Gains less losses on financial transactions	544	559	(27,034)	1,058
- Impairment losses	(304)			
Total gain / (loss) recognized in Equity - Reserves	943			
Total gain / (loss) recognized in Equity - Retained Earnings	(3,048)			
Purchases / Issues / Disbursements	366	23	38,624	
Sales		(485)		(890)
Repayments	(2,111)		(65,317)	
Transfer to "Assets held for sale"			(25,645)	
Transfer out Level 3 to Level 2	(10,274)			(10,151)
<b>Balance 30.9.2018</b>	<b>54,047</b>	<b>8,934</b>	<b>312,960</b>	<b>16,825</b>
<b>Changes for the period 1.10 - 31.12.2018</b>				
Total gain / (loss) recognized in Income Statement:	345	425	1,988	999
- Interest	1,129	130	2,689	34
- Gains less losses on financial transactions	(529)	295	(701)	965
- Impairment losses	(255)			
Total gain / (loss) recognized in Equity - Reserves	133			
Total gain / (loss) recognized in Equity - Retained Earnings	(1,960)			
Purchases / Disbursements	28,040	690	8,128	
Sales		(65)		890
Repayments	(1,337)		(4,616)	(1,559)
Transfer out Level 3 to Level 2	(183)			(492)
<b>Balance 31.12.2018</b>	<b>79,085</b>	<b>9,984</b>	<b>318,460</b>	<b>16,663</b>
Amounts included in the income statement and relate to financial instruments included in the balance sheet at the end of the period 1.1 - 30.9.2018	384	1,243	(23,841)	1,311
- Interest	432	684	9,381	253
- Gains less losses on financial transactions	257	559	(33,222)	1,058
- Impairment losses	(305)			

During the previous year, a bond amounting to € 10,457 and derivatives amounting to € 10,643 were transferred from Level 3 to Level 2 as observable data were used for their valuation.



Sensitivity analysis for Level 3 financial instruments on 30.9.2019 for which their valuation was based on significant non-observable data is presented in the following table:

	Significant non-observable inputs	Quantitative information on non-observable inputs	Significant non-observable inputs change	Total effect in income statement		Total effect in Equity	
				Favourable Variation	Unfavourable Variation	Favourable Variation	Unfavourable Variation
Derivative Financial Assets	The probability of default and loss given default of the counterparty (BCVA adjustment) calculated using an internal model	Average probability of default equal to 100% and average loss in the case of default of counterparty equal to 27%	Increase the probability of default through reduction of internal ratings by 2 scales / Increase the loss given default by 10%		(177)		
	Assessment of the adequacy of reserves for the payment of hybrid securities dividends	From 2021 to maturity, probability 100%	Increase the probability of dividend payments to 100%		(492)		
	Credit spread	Credit spread equal to 300 bps	Increase of Credit spread by 10%		(867)		
Bonds measured at fair value through other comprehensive income	Bond yield	Bond yield equal to 8.39%	Variation +/-10% in estimated return			163	(161)
Shares measured at fair value through other comprehensive income	Valuation indexes	Indexes P/BV 0.96x, EV /Sales 15.7x, Indexes P/BV 0.39x, / WACC+/- 1%	Variation +/-10% in P/B and EV / Sales indexes (multiples valuation method). By changing WACC by +/- 1%			648	(648)
Bonds measured at fair value through profit or loss	Issuer price / Credit spread	Issuer price equal to 76.45% - Average credit spread equal to 1,378 bps	Variation +/-10% in issuer's price, +/-10% in adjustment of estimated Credit Risk	1,061	(934)		
Loans measured at fair value through profit or loss	Expected credit loss and cash flows from credit risk of the counterparty	Average credit spread and liquidity premium equal to 27.51%	Decrease of the expected cash flows by 10% on loans individually assessed		(11,901)		
<b>Total</b>				<b>1,061</b>	<b>(14,371)</b>	<b>811</b>	<b>(809)</b>

There are no interrelations between non-observable data that could significantly affect the fair value.

## 27. Credit risk disclosures of financial instruments

This disclosure presents information regarding credit risk for the categories of financial instruments for which expected credit losses are recognized, in accordance with I.F.R.S. 9.

More specifically, the classification of financial instruments and the movement of the allowance for impairment losses per stage, is presented.



## a. Due from Banks

	30.9.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired receivables (POCI)	Total
<b>Balance 30.9.2019</b>					
Carrying amount (before allowance for impairment losses)	3,550,576		69,961		3,620,537
Expected credit losses	(143)		(69,961)		(70,104)
<b>Net carrying amount</b>	<b>3,550,433</b>	-	-	-	<b>3,550,433</b>

	31.12.2018				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired receivables (POCI)	Total
<b>Balance 31.12.2018</b>					
Carrying amount (before allowance for impairment losses)	2,500,656		69,961		2,570,617
Expected credit losses	(164)		(69,961)		(70,125)
<b>Net carrying amount</b>	<b>2,500,492</b>	-	-	-	<b>2,500,492</b>

	Accumulated allowance for impairment losses				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired receivables (POCI)	Total
<b>Opening balance 1.1.2018</b>	<b>274</b>	-	<b>69,961</b>	-	<b>70,235</b>
<b>Change for the period 1.1 - 30.9.2018</b>					
Net remeasurement of loss allowance (a)	(51)				(51)
Impairment losses on new receivables (b)	157				157
Change in credit risk parameters (c)					-
<b>Impairment losses on receivables (a)+(b)+(c)</b>	<b>106</b>	-	-	-	<b>106</b>
Derecognition of financial assets					-
Foreign exchange and other movements	(84)				(84)
<b>Balance 30.9.2018</b>	<b>296</b>	-	<b>69,961</b>	-	<b>70,257</b>
<b>Changes for the period 1.10 - 31.12.2018</b>					
Net remeasurement of loss allowance (a)	51				51
Impairment losses on new receivables (b)	(160)				(160)
Change in credit risk parameters (c)	(15)				(15)
<b>Impairment losses on receivables (a)+(b)+(c)</b>	<b>(124)</b>	-	-	-	<b>(124)</b>
Derecognition of financial assets					-
Foreign exchange and other movements	(8)				(8)
<b>Balance 31.12.2018</b>	<b>164</b>	-	<b>69,961</b>	-	<b>70,125</b>
<b>Changes for the period 1.1 - 30.9.2019</b>					
Net remeasurement of loss allowance (a)					-
Impairment losses on new receivables (b)	73				73
Change in credit risk parameters (c)	(121)				(121)
<b>Impairment losses on receivables (a)+(b)+(c)</b>	<b>(48)</b>	-	-	-	<b>(48)</b>
Derecognition of financial assets					-
Foreign exchange and other movements	27				27
<b>Balance 30.9.2019</b>	<b>143</b>	-	<b>69,961</b>	-	<b>70,104</b>

**b. Loans to customers measured at amortised cost**

For credit risk disclosure purposes, the accumulated provision for impairment losses includes the fair value adjustment for the contractual balance of loans which were impaired at their acquisition (POCI) since the Group, from credit risk perspective, monitors the respective adjustment as part of the provision. These loans were recognized either in the context of acquisition of specific loans or companies (i.e. Emporiki Bank and Citibank's retail operations in Greece), or as a result of significant modification of the terms of the previous loan that led to derecognition. A relevant adjustment has also been made at the carrying amount of loans.

The following table presents loans measured at amortised cost per I.F.R.S. 9 stage:

	30.9.2019				Total
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	
<b>Mortgage</b>					
Carrying amount (before provision for impairment losses)	5,454,261	2,888,999	6,315,919	3,050,231	17,709,410
Expected credit losses	(5,088)	(65,595)	(1,999,011)	(701,134)	(2,770,828)
<b>Net carrying amount</b>	<b>5,449,172</b>	<b>2,823,405</b>	<b>4,316,908</b>	<b>2,349,097</b>	<b>14,938,582</b>
<b>Consumer</b>					
Carrying amount (before provision for impairment losses)	776,323	377,906	1,924,020	1,248,533	4,326,782
Expected credit losses	(5,810)	(47,698)	(1,125,959)	(543,561)	(1,723,027)
<b>Net carrying amount</b>	<b>770,513</b>	<b>330,209</b>	<b>798,061</b>	<b>704,972</b>	<b>2,603,755</b>
<b>Credit Cards</b>					
Carrying amount (before provision for impairment losses)	861,034	126,903	240,523	48,449	1,276,910
Expected credit losses	(13,276)	(35,948)	(135,965)	(32,731)	(217,921)
<b>Net carrying amount</b>	<b>847,758</b>	<b>90,955</b>	<b>104,558</b>	<b>15,718</b>	<b>1,058,989</b>
<b>Small business loans</b>					
Carrying amount (before provision for impairment losses)	458,077	588,060	2,971,765	909,337	4,927,239
Expected credit losses	(2,657)	(73,668)	(1,188,853)	(429,527)	(1,694,705)
<b>Net carrying amount</b>	<b>455,420</b>	<b>514,393</b>	<b>1,782,912</b>	<b>479,810</b>	<b>3,232,534</b>
<b>Total retail lending</b>					
Carrying amount (before provision for impairment losses)	7,549,695	3,981,869	11,452,226	5,256,551	28,240,341
Expected credit losses	(26,831)	(222,908)	(4,449,788)	(1,706,954)	(6,406,481)
<b>Net carrying amount</b>	<b>7,522,863</b>	<b>3,758,961</b>	<b>7,002,438</b>	<b>3,549,597</b>	<b>21,833,860</b>
<b>Corporate lending and public sector</b>					
Carrying amount (before provision for impairment losses)	12,575,539	1,440,660	5,231,286	982,290	20,229,775
Expected credit losses	(107,620)	(69,885)	(2,505,355)	(474,670)	(3,157,531)
<b>Net carrying amount</b>	<b>12,467,919</b>	<b>1,370,775</b>	<b>2,725,930</b>	<b>507,620</b>	<b>17,072,245</b>
<b>Total loans</b>					
Carrying amount (before provision for impairment losses)	20,125,234	5,422,530	16,683,512	6,238,841	48,470,116
Expected credit losses	(134,451)	(292,793)	(6,955,143)	(2,181,624)	(9,564,012)
<b>Net carrying amount</b>	<b>19,990,783</b>	<b>5,129,736</b>	<b>9,728,368</b>	<b>4,057,217</b>	<b>38,906,104</b>

"Purchased or originated credit impaired loans (POCI)" include loans amounting to € 820,932 (31.12.2018: € 829,994) which as at 30.9.2019 are not impaired / non performing.



	31.12.2018				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
<b>Mortgage</b>					
Carrying amount (before provision for impairment losses)	5,393,379	3,326,871	6,654,454	3,185,817	18,560,521
Expected credit losses	(3,251)	(61,640)	(2,410,223)	(785,680)	(3,260,794)
<b>Net carrying amount</b>	<b>5,390,128</b>	<b>3,265,231</b>	<b>4,244,231</b>	<b>2,400,137</b>	<b>15,299,727</b>
<b>Consumer</b>					
Carrying amount (before provision for impairment losses)	786,560	444,694	1,923,402	1,290,277	4,444,933
Expected credit losses	(6,323)	(58,368)	(1,086,335)	(563,368)	(1,714,394)
<b>Net carrying amount</b>	<b>780,237</b>	<b>386,326</b>	<b>837,067</b>	<b>726,909</b>	<b>2,730,539</b>
<b>Credit Cards</b>					
Carrying amount (before provision for impairment losses)	958,371	101,732	243,772	53,652	1,357,527
Expected credit losses	(13,297)	(25,787)	(190,518)	(42,771)	(272,373)
<b>Net carrying amount</b>	<b>945,074</b>	<b>75,945</b>	<b>53,254</b>	<b>10,881</b>	<b>1,085,154</b>
<b>Small business loans</b>					
Carrying amount (before provision for impairment losses)	437,649	566,161	3,217,167	965,044	5,186,021
Expected credit losses	(2,396)	(67,952)	(1,347,950)	(465,926)	(1,884,224)
<b>Net carrying amount</b>	<b>435,253</b>	<b>498,209</b>	<b>1,869,217</b>	<b>499,118</b>	<b>3,301,797</b>
<b>Total retail lending</b>					
Carrying amount (before provision for impairment losses)	7,575,959	4,439,458	12,038,795	5,494,790	29,549,002
Expected credit losses	(25,267)	(213,747)	(5,035,026)	(1,857,745)	(7,131,785)
<b>Net carrying amount</b>	<b>7,550,692</b>	<b>4,225,711</b>	<b>7,003,769</b>	<b>3,637,045</b>	<b>22,417,217</b>
<b>Corporate lending and public sector</b>					
Carrying amount (before provision for impairment losses)	12,013,001	1,507,923	7,246,947	1,430,227	22,198,098
Expected credit losses	(115,353)	(68,217)	(3,926,846)	(784,167)	(4,894,583)
<b>Net carrying amount</b>	<b>11,897,648</b>	<b>1,439,706</b>	<b>3,320,101</b>	<b>646,060</b>	<b>17,303,515</b>
<b>Total loans</b>					
Carrying amount (before provision for impairment losses)	19,588,960	5,947,381	19,285,742	6,925,017	51,747,100
Expected credit losses	(140,620)	(281,964)	(8,961,872)	(2,641,912)	(12,026,368)
<b>Net carrying amount</b>	<b>19,448,340</b>	<b>5,665,417</b>	<b>10,323,870</b>	<b>4,283,105</b>	<b>39,720,732</b>



The below table presents the accumulated provision for impairment losses on loans to customers measured at amortised cost.

	Accumulated provision for impairment losses														
	Retail lending						Corporate lending and public sector						Total		
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
<b>Balance 1.1.2019</b>	<b>25,267</b>	<b>213,747</b>	<b>5,035,026</b>	<b>1,857,745</b>	<b>7,131,785</b>	<b>115,353</b>	<b>68,217</b>	<b>3,926,846</b>	<b>784,167</b>	<b>4,894,583</b>	<b>140,620</b>	<b>281,964</b>	<b>8,961,872</b>	<b>2,641,912</b>	<b>12,026,368</b>
<b>Changes for the period 1.1 - 30.9.2019</b>															
Transfers to stage 1 from stage 2 or 3	40,043	(37,376)	(2,667)		-	9,250	(7,904)	(1,346)		-	49,293	(45,280)	(4,013)		-
Transfers to stage 2 from stage 1 or 3	(7,653)	128,982	(121,529)		-	(7,046)	12,664	(5,618)		-	(14,699)	141,646	(126,947)		-
Transfers to stage 3 from stage 1 or 2	(444)	(75,558)	76,002		-	(3,653)	(11,860)	15,493		-	(4,077)	(87,418)	91,495		-
Net remeasurement of loss allowance (a)	(31,774)	17,307	74,295	1,297	61,125	(11,987)	885	71,902	(1,154)	59,646	(43,761)	18,192	146,197	143	120,771
Impairment losses on new loans (b)	2,783	69	154	(5,179)	(2,173)	20,523	261	268	22	21,074	23,306	330	422	(5,157)	18,901
Change in risk parameters (c)	4,043	(4,210)	94,641	1,11,484	205,958	(14,871)	4,523	195,481	23,549	208,682	(10,828)	313	290,122	135,053	414,640
<b>Impairment losses on loans (a) + (b) + (c)</b>	<b>(24,948)</b>	<b>13,166</b>	<b>169,090</b>	<b>107,602</b>	<b>264,910</b>	<b>(6,355)</b>	<b>5,669</b>	<b>267,651</b>	<b>22,417</b>	<b>289,402</b>	<b>(31,283)</b>	<b>18,835</b>	<b>436,741</b>	<b>130,019</b>	<b>554,312</b>
Derecognition of loans	(17)	(142)	(10,013)	(2,239)	(12,411)	(299)	(17)	(106,008)	(10,250)	(116,574)	(316)	(159)	(116,021)	(12,489)	(128,985)
Write offs	(1,323)	(19,702)	(654,810)	(249,221)	(925,056)			(633,208)	(94,614)	(727,822)	(1,323)	(19,702)	(1,288,018)	(343,835)	(1,652,878)
Foreign exchange and other movements	(1,758)	(12)	20,780	17,565	36,575	330	3,116	(9,881)	4,565	(1,870)	(1,428)	3,104	10,899	22,130	34,705
Change in the present value of provision for impairment losses			(22,390)	(21,909)	(44,299)			39,798	10,200	49,998			17,408	(11,709)	5,699
Reclassification of accumulated provision for impairment losses to 'Assets held for sale'	(2,335)	(197)	(39,901)	(2,589)	(45,022)			(988,372)	(241,815)	(1,230,187)	(2,335)	(197)	(1,028,273)	(244,404)	(1,275,209)
<b>Balance 30.9.2019</b>	<b>26,832</b>	<b>222,908</b>	<b>4,449,788</b>	<b>1,706,954</b>	<b>6,406,482</b>	<b>107,620</b>	<b>69,885</b>	<b>2,505,355</b>	<b>474,670</b>	<b>3,157,530</b>	<b>134,452</b>	<b>292,793</b>	<b>6,955,143</b>	<b>2,181,624</b>	<b>9,564,012</b>





	Accumulated provision for impairment losses													
	Retail lending						Corporate lending and public sector						Total	
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total	Purchased or originated credit impaired loans (POCI)	Total
<b>Balance 1.1.2018</b>	21,562	419,891	5,450,055	8,336,275	101,141	193,478	4,615,435	5,980,902	122,703	613,369	10,065,490	3,515,615	14,317,177	
<b>Changes for the period 1.1 - 30.9.2018</b>														
Transfers to stage 1 from stage 2 or 3	68,195	(62,824)	(5,371)	-	53,647	(52,598)	(1,049)	-	121,842	(115,422)	(6,420)	-	-	
Transfers to stage 2 from stage 1 or 3	(7,792)	177,931	(170,139)	-	(15,113)	23,389	(8,276)	-	(22,905)	201,320	(178,415)	-	-	
Transfers to stage 3 from stage 1 or 2	(2,480)	(167,293)	169,773	-	(5,452)	(16,746)	22,198	-	(7,932)	(184,039)	191,971	-	-	
Net remeasurement of loss allowance (a)	(57,433)	18,138	39,412	(12,404)	(37,701)	27,982	55,351	44,081	(95,134)	46,120	94,763	(14,072)	31,677	
Impairment losses on new loans (b)	4,756			6,081	20,575		1,407	31,982	25,331		12,732	38,063		
Change in risk parameters (c)	589	(11,919)	378,653	533,704	(33,048)	(25,319)	415,715	1,1846	369,194	(37,238)	794,368	178,227	902,898	
<b>Impairment losses on loans (a) + (b) + (c)</b>	<b>(52,088)</b>	<b>6,219</b>	<b>418,065</b>	<b>527,381</b>	<b>(50,174)</b>	<b>2,663</b>	<b>471,066</b>	<b>445,257</b>	<b>(102,262)</b>	<b>8,882</b>	<b>889,131</b>	<b>176,887</b>	<b>972,638</b>	
Derecognition of loans	(60)	(224)	(3,291)	(745)	(69)	(787)	(15,651)	(8,668)	(1,29)	(1,011)	(18,942)	10,669	(9,413)	
Write offs	(1,106)	(7,057)	(422,579)	(686,988)	(5)	(5)	(459,526)	(1,357,75)	(1,111)	(7,057)	(882,105)	(392,021)	(1,282,294)	
Foreign exchange and other movements	(1,623)	(3,472)	25,439	22,004	4,578	1,573	65,612	16,640	2,955	(1,899)	91,051	(53,463)	38,644	
Change in the present value of provision for impairment losses														
Reclassification of accumulated provision for impairment losses to 'Assets held for sale'	(16)	(649)	(606,454)	(403,726)	(150)		(551,658)	(11,4308)	(166)	(649)	(1,158,112)	(518,034)	(1,676,961)	
<b>Balance 30.9.2018</b>	<b>24,592</b>	<b>362,522</b>	<b>4,734,090</b>	<b>7,024,319</b>	<b>88,403</b>	<b>150,972</b>	<b>4,199,884</b>	<b>820,576</b>	<b>5,259,835</b>	<b>112,995</b>	<b>513,494</b>	<b>8,933,974</b>	<b>2,723,691</b>	<b>12,284,154</b>
<b>Changes for the period 1.10 - 31.12.2018</b>														
Transfers to stage 1 from stage 2 or 3	47,350	(46,553)	(797)	-	92,966	(67,503)	(25,463)	-	140,316	(114,056)	(26,260)	-	-	
Transfers to stage 2 from stage 1 or 3	(1,567)	54,293	(52,726)	-	(672)	33,821	(33,149)	-	(2,239)	88,114	(85,875)	-	-	
Transfers to stage 3 from stage 1 or 2	1,956	(25,814)	23,858	-	(3,456)	(4,263)	7,719	-	(1,500)	(30,077)	31,577	-	-	
Net remeasurement of loss allowance (a)	(16,604)	(9,254)	19,624	(4,381)	(22,053)	(30,184)	54,972	2,735	(38,657)	(39,438)	74,596	(4,381)	(7,880)	
Impairment losses on new loans (b)	(1,035)			3,785	7,806		(8,548)	(742)	6,771		(3,728)	3,043		
Change in risk parameters (c)	(30,008)	(116,956)	585,516	549,435	(48,882)	(14,472)	195,727	10,439	142,812	(78,890)	781,243	121,322	692,247	
<b>Impairment losses on loans (a) + (b) + (c)</b>	<b>(47,647)</b>	<b>(126,210)</b>	<b>605,140</b>	<b>542,605</b>	<b>(63,129)</b>	<b>(44,656)</b>	<b>250,699</b>	<b>1,891</b>	<b>(144,805)</b>	<b>(110,776)</b>	<b>855,839</b>	<b>113,213</b>	<b>687,410</b>	
Derecognition of loans	43	126	(2,354)	(6,296)	94	(1,561)	(172,544)	(4,992)	137	(1,435)	(174,898)	(9,103)	(185,299)	
Write offs	(237)	(3,574)	(368,778)	(629,550)	(83)	(83)	(252,120)	(220,965)	(473,168)	(320)	(3,574)	(620,898)	(866,718)	
Foreign exchange and other movements	777	(1,043)	7,148	9,845	1,230	1,407	(101,641)	2,115,49	2,007	364	(94,493)	214,512	122,390	
Change in the present value of provision for impairment losses														
Reclassification of accumulated provision for impairment losses to 'Assets held for sale'														
<b>Balance 31.12.2018</b>	<b>25,267</b>	<b>213,747</b>	<b>5,035,026</b>	<b>7,131,785</b>	<b>115,353</b>	<b>68,217</b>	<b>3,926,846</b>	<b>784,167</b>	<b>4,894,583</b>	<b>140,620</b>	<b>281,964</b>	<b>8,961,872</b>	<b>2,641,912</b>	<b>12,026,368</b>



The Group has recognized expected credit losses for the undrawn credit facilities and letters of credit and letters of guarantee, the movement of which is presented in the following tables:

	Accumulated provision for impairment losses				
	Off-balance sheet items				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
<b>Balance 1.1.2019</b>	<b>15,176</b>	<b>3,815</b>	<b>73,069</b>	<b>161</b>	<b>92,221</b>
<b>Changes for the period 1.1 - 30.9.2019</b>					
Transfers to stage 1 from stage 2 or 3	2,671	(2,213)	(458)		-
Transfers to stage 2 from stage 1 or 3	(492)	544	(52)		-
Transfers to stage 3 from stage 1 or 2	(266)	(275)	541		-
Net remeasurement of loss allowance (a)	(2,362)	850	5,416		3,904
Impairment losses on new off balance sheet items (b)	1,267				1,267
Change in risk parameters (c)	1,107	1,846	3,729	(146)	6,536
<b>Impairment losses on off balance sheet items (a)+(b)+(c)</b>	<b>12</b>	<b>2,696</b>	<b>9,145</b>	<b>(146)</b>	<b>11,707</b>
Foreign exchange and other movements		49	(28)	11	32
<b>Balance 30.9.2019</b>	<b>17,101</b>	<b>4,616</b>	<b>82,217</b>	<b>26</b>	<b>103,960</b>

	Accumulated provision for impairment losses				
	Off-balance sheet items				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
<b>Balance 1.1.2018</b>	<b>9,798</b>	<b>5,609</b>	<b>94,690</b>	<b>1</b>	<b>110,098</b>
<b>Changes for the period 1.1 - 30.9.2018</b>					
Transfers to stage 1 from stage 2 or 3	3,729	(2,030)	(1,699)		-
Transfers to stage 2 from stage 1 or 3	(708)	994	(286)		-
Transfers to stage 3 from stage 1 or 2	(144)	(351)	495		-
Net remeasurement of loss allowance (a)	(2,600)	2,718	5,735	2	5,855
Impairment losses on new off balance sheet items (b)	717				717
Change in risk parameters (c)	(451)	74	(28,352)	189	(28,540)
<b>Impairment losses on off balance sheet items (a)+(b)+(c)</b>	<b>(2,334)</b>	<b>2,792</b>	<b>(22,617)</b>	<b>191</b>	<b>(21,968)</b>
Foreign exchange and other movements	(370)	489	(52)	(3)	64
<b>Balance 30.9.2018</b>	<b>9,971</b>	<b>7,503</b>	<b>70,531</b>	<b>189</b>	<b>88,194</b>
<b>Changes for the period 1.10. - 31.12.2018</b>					
Transfers to stage 1 from stage 2 or 3	3,149	(3,139)	(11)	1	-
Transfers to stage 2 from stage 1 or 3	17	26	(43)		-
Transfers to stage 3 from stage 1 or 2	(115)	(229)	344		-
Net remeasurement of loss allowance (a)	(142)	(459)	2,321	1	1,721
Impairment losses on new off balance sheet items (b)	523				523
Change in risk parameters (c)	1,771	163	(133)	(33)	1,768
<b>Impairment losses on off balance sheet items (a)+(b)+(c)</b>	<b>2,152</b>	<b>(296)</b>	<b>2,188</b>	<b>(32)</b>	<b>4,012</b>
Foreign exchange and other movements	2	(50)	60	3	15
<b>Balance 31.12.2018</b>	<b>15,176</b>	<b>3,815</b>	<b>73,069</b>	<b>161</b>	<b>92,221</b>

The total amount of provision for credit risk that the Group has recognized and derive from contracts with customers stands at € 9,712,073 at 30.9.2019 (31.12.2018: € 12,150,451), taking into consideration the accumulated provision for impairment losses for loans measured at amortized cost amounting to € 9,564,012 (31.12.2018: € 12,026,368), the



provisions for off balance sheet items amounting to € 103,960 (31.12.2018: € 92,221) and the accumulated impairment losses for receivables from customers measured at amortized cost amounting to € 44,101 (31.12.2018: € 31,862).

It is noted that the above stated amounts and previously presented credit risk tables, do not include the balances and the accumulated provision for impairment losses of loans that have been classified as held for sale.

### c. Investment securities

#### i. Investment securities measured at fair value through other comprehensive income

The following table presents the classification of investment securities per stage and the reconciliation of accumulated impairment per stage:

	30.9.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
<b>Greek Government treasury bonds</b>					
Expected credit losses	(23,953)				(23,953)
Fair value	4,593,674				4,593,674
<b>Other Government treasury bonds</b>					
Expected credit losses	(823)				(823)
Fair value	1,842,484				1,842,484
<b>Other securities</b>					
Expected credit losses	(3,213)	(76)			(3,289)
Fair value	1,480,708	1,280			1,481,988
<b>Total securities measured at fair value through other comprehensive income</b>					
<b>Expected credit losses</b>	<b>(27,989)</b>	<b>(76)</b>	<b>-</b>	<b>-</b>	<b>(28,065)</b>
<b>Fair value</b>	<b>7,916,866</b>	<b>1,280</b>	<b>-</b>	<b>-</b>	<b>7,918,146</b>

	31.12.2018				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
<b>Greek Government treasury bonds</b>					
Expected credit losses	(52,247)				(52,247)
Fair value	3,760,627				3,760,627
<b>Other Government treasury bonds</b>					
Expected credit losses	(976)				(976)
Fair value	1,330,072				1,330,072
<b>Other securities</b>					
Expected credit losses	(4,010)	(241)			(4,251)
Fair value	1,756,438	8,916			1,765,354
<b>Total securities measured at fair value through other comprehensive income</b>					
<b>Expected credit losses</b>	<b>(57,233)</b>	<b>(241)</b>	<b>-</b>	<b>-</b>	<b>(57,474)</b>
<b>Fair value</b>	<b>6,847,137</b>	<b>8,916</b>	<b>-</b>	<b>-</b>	<b>6,856,053</b>

Except for the above, investment securities measured at fair value through other comprehensive income, include shares with a fair value equal of € 91,077 (31.12.2018: € 105,768).



	Accumulated provision for impairment losses				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
<b>Balance 1.1.2018</b>	<b>84,312</b>	<b>3,099</b>			<b>87,411</b>
<b>Changes for the period 1.1 - 30.9.2018</b>					
Transfers to stage 1 from stage 2 or 3	13	(13)			-
Net remeasurement of loss allowance (a)	(3)				(3)
Impairment losses on new securities (b)	34,637				34,637
Change in credit risk parameters (c)	(39,674)	(1,622)			(41,296)
<b>Impairment losses on securities (a)+(b)+(c)</b>	<b>(5,040)</b>	<b>(1,622)</b>	-	-	<b>(6,662)</b>
Derecognition of financial assets	(30,358)	(998)			(31,356)
Foreign exchange and other movements	(132)				(132)
<b>Balance 30.9.2018</b>	<b>48,795</b>	<b>466</b>	-	-	<b>49,261</b>
<b>Changes for the period 1.10. - 31.12.2018</b>					
Net remeasurement of loss allowance (a)					-
Impairment losses on new securities (b)	13,830				13,830
Change in credit risk parameters (c)	391	(168)			223
<b>Impairment losses on securities (a)+(b)+(c)</b>	<b>14,221</b>	<b>(168)</b>	-	-	<b>14,053</b>
Derecognition of financial assets	(5,915)	(57)			(5,972)
Foreign exchange and other movements	132				132
<b>Balance 31.12.2018</b>	<b>57,233</b>	<b>241</b>	-	-	<b>57,474</b>
<b>Changes for the period 1.1 - 30.9.2019</b>					
Transfers to Stage 2 from Stage 1 or 3	(8)	8			
Net remeasurement of loss allowance (a)		93			93
Impairment losses on new securities (b)	16,826				16,826
Change in credit risk parameters (c)	(29,843)	(238)			(30,081)
<b>Impairment losses on securities (a)+(b)+(c)</b>	<b>(13,017)</b>	<b>(145)</b>	-	-	<b>(13,162)</b>
Derecognition of financial assets	(16,230)	(28)			(16,258)
Foreign exchange and other movements	11				11
<b>Balance 30.9.2019</b>	<b>27,989</b>	<b>76</b>	-	-	<b>28,065</b>

The results of the nine-month period of 2019, include a further decrease of € 20 (30.9.2018: € 543 additional increase) in the expected credit losses in Stage 1, which relates to the movement of the accumulated impairment, from the beginning to the end of the nine-month period, of the securities purchased in the FVOCI portfolio, at the first and last date of the semester which have been agreed but not settled on these two dates. The accumulated impairment, depending on the valuation of the issues is recorded in "Other assets" or "Other liabilities" caption.

## ii. Investment securities measured at amortized cost

The following table presents the classification of investment securities per stage and the reconciliation of accumulated impairment per stage:

	30.9.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
<b>Greek Government treasury bonds</b>					
Carrying amount (before provision for impairment losses)	390,144				390,144
Expected credit losses	(2,698)				(2,698)
<b>Net carrying amount</b>	<b>387,446</b>	-	-	-	<b>387,446</b>
<b>Total investment securities measured at amortized cost</b>					
Carrying amount (before provision for impairment losses)	390,144	-	-	-	390,144
Expected credit losses	(2,698)	-	-	-	(2,698)
<b>Net carrying amount</b>	<b>387,446</b>	-	-	-	<b>387,446</b>



	Accumulated provision for impairment losses				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
<b>Balance 1.1.2019</b>	-	-	-	-	-
<b>Changes for the period 1.1-30.9.2019</b>					
Net remeasurement of loss allowance (a)					
Impairment losses on new securities (b)	2,698				2,698
Change in credit risk parameters (c)					-
<b>Impairment losses on securities (a)+(b)+(c)</b>	<b>2,698</b>	-	-	-	<b>2,698</b>
<b>Balance 30.9.2019</b>	<b>2,698</b>	-	-	-	<b>2,698</b>

## 28. Capital adequacy

The policy of the Group is to maintain a strong capital base in order to ensure the development and the trust of depositors, shareholders, markets and business partners.

Share capital increases are conducted following resolutions of the General Meeting of Shareholders or of the Board of Directors, in accordance with articles of incorporation or relevant laws.

For the period that the Hellenic Financial Stability Fund (HFSF) participates in the Share Capital of the Bank, the purchase of own shares is not allowed without its approval, according to the Relationship Framework Agreement (RFA) which has been signed between the Bank and the HFSF.

The Capital Adequacy ratio compares the Group's regulatory capital with the risks that it undertakes (Risk Weighted Assets - RWAs). Regulatory capital includes Common Equity Tier 1 (CET1) capital (share capital, reserves, minority interests), additional Tier 1 capital (hybrid securities) and Tier 2 capital (subordinated debt). RWAs include the credit risk of the investment portfolio, the market risk of the trading book and the operational risk.

Alpha Bank, as a systemic bank, is supervised by the Single Supervisory Mechanism (SSM) of the European Central Bank (ECB), since November 2014, to which reports are submitted every quarter. The supervision is conducted in accordance with the European Regulation 575/2013 (CRR) and the relevant European Directive 2013/36 (CRD IV), which was incorporated into the Greek Law through the Law 4261/2014. The framework is broadly known as Basel III.

According to the above regulatory framework, for the calculation of capital adequacy ratio the effective transitional arrangements are followed. In addition:

- Besides the 8% capital adequacy limit, there are applicable limits of 4.5% for CET 1 ratio and 6% for Tier 1 ratio respectively.
- The maintenance of capital buffers additional to the CET1 capital are required. In particular:
  - Capital conservation buffer stands at 2.5%.
  - Bank of Greece through Executive Acts set the following capital buffers:
    - Countercyclical capital buffer equals to "zero percent" (0%) for 2019.
    - Other systemically important institutions (O-SII) buffer, which will gradually rise to "one percent" (1%) from 1.1.2019 to 1.1.2021. For 2019, the O-SII buffer stands at 0.25%. These limits should be met both on a standalone and on consolidated basis.

	30.9.2019 (estimation)*	31.12.2018
Common Equity Tier I	18.0%	17.4%
Tier I	18.0%	17.4%
<b>Capital adequacy ratio</b>	<b>18.0%</b>	<b>17.4%</b>

\* In accordance with the Decision 2015/656 of European Central Bank, unaudited profits of the period are not included in the calculation of the ratios.



Supervisory disclosures regarding capital adequacy and risk management in accordance with Regulation 575/2013 (Pillar III) will be published on the Bank's website.

On 8 February 2019, the ECB informed Alpha Bank that since 1st March 2019 the minimum limit for the Overall Capital Requirement (OCR) is 13.75%, increased by 0.875%, due to the fully phased-in capital conservation buffer and the gradual increase of the O-SII buffer. The OCR is composed by the minimum own funds requirements (8%), according to article 92(1) of the CRR, the additional Pillar II own funds requirements (P2R), according to article 16(2) (a) of the Regulation 1024/2013/EU, and the combined buffer requirements (CBR), according to article 128(6) of the Directive 2013/36/EU. The above minimum ratio should be maintained on a phase-in basis under applicable transitional rules of the CRR / CRD IV, at all times.

A stress-testing exercise has been announced to be launched in 2020. This will be conducted by EBA for the largest European banks and by ECB for the banks which are not included in the first group. The results of the stress testing exercise will be incorporated into the overall assessment within the 2020 Supervisory Review and Evaluation Process (SREP). Both exercises will be carried out on a consolidated level and under a common methodology which is expected to be finalized by the end of 2019, according to EBA's announcement. Alpha Bank has been selected to participate in the stress test exercise of ECB, which is expected to be launched at the beginning of 2020 while results are expected to be announced by July 2020.

## 29. Related-party transactions

The Bank and the remaining companies of the Group, enters into a number of transactions with related parties in the normal course of business. These transactions are performed at arm's length and are approved by the competent Bank's committees.

a. The outstanding balances of the Group's transactions with key management personnel, which consist of members of the Board of Directors and the Bank's Executive Committee, their close family members and the entities controlled by them, as well as, the results related to those transactions are as follows:

	30.9.2019	31.12.2018
<b>Assets</b>		
Loans and advances to customers	1,789	1,299
<b>Liabilities</b>		
Due to customers	7,004	6,524
Employee defined benefit obligations	226	251
<b>Total</b>	<b>7,230</b>	<b>6,775</b>
<b>Letters of guarantee and approved limits</b>	<b>2,052</b>	<b>2,022</b>

	FROM 1 JANUARY TO	
	30.9.2019	30.9.2018
<b>Income</b>		
Interest and similar income	31	34
Fee and commission income	5	2
<b>Total</b>	<b>36</b>	<b>36</b>
<b>Expenses</b>		
Interest expense and similar charges	17	11
General Administrative Expenses	1	
Fees paid to key management and close family members	3,085	2,477
<b>Total</b>	<b>3,103</b>	<b>2,488</b>



According to the decision of the General Meeting of Shareholders held at 29.6.2018, a compensation scheme is operating for the Bank's Senior Management, the terms of which were specified in a regulation issued subsequently. The program is voluntary, does not constitute business practice and the program may be terminated in the future by a competent decision of the General Meeting of Shareholders. It provides incentives for the eligible executives to comply with the terms of departure, proposed by the Bank, thus ensuring the smooth (only during the period and under the terms and conditions approved by the Bank) departure and succession of Senior Management.

b. The outstanding balances of the Group's transactions with associates and joint ventures and the results related to these transactions are as follows:

	30.9.2019	31.12.2018
<b>Assets</b>		
Loans and advances to customers	63,327	61,505
Other assets	1,018	2,000
<b>Total</b>	<b>64,345</b>	<b>63,505</b>
<b>Liabilities</b>		
Due to customers	17,899	23,124
Other liabilities	1,833	4,473
<b>Total</b>	<b>19,732</b>	<b>27,597</b>

	FROM 1 JANUARY TO	
	30.9.2019	30.9.2018
<b>Income</b>		
Interest and similar income	1,281	2,209
Fee and commission income	3	3
Gains less losses on financial transactions	3,081	946
Other income	129	169
<b>Total</b>	<b>4,494</b>	<b>3,327</b>
<b>Expenses</b>		
Interest expense and similar charges	7	2
General administrative expenses	11,930	10,634
<b>Total</b>	<b>11,937</b>	<b>10,636</b>

c. The Employee's Supplementary Fund maintains deposits with the Bank amounting to € 7 (31.12.2018: € 7).

d. The Hellenic Financial Stability Fund (HFSF) exerts significant influence on the Bank. In particular, according to Law 3864/2010 and the Relationship Framework Agreement (RFA) signed on 23.11.2015, which replaced the previous signed in 2013, HFSF has a participation in the Board of Directors and in other significant Committees of the Bank. Therefore, according to IAS 24, HFSF and its related entities are considered related parties for the Bank.

The outstanding balances and the results related to these transactions are analyzed as follows:

	FROM 1 JANUARY TO	
	30.9.2019	30.9.2018
<b>Income</b>		
Fee and commission income	6	8

**30. Assets held for sale**

	30.9.2019	31.12.2018
<b>Assets held for sale</b>		
APE Commercial Property A.E., APE Investment Property A.E.	46,217	46,217
Non-Performing Loan portfolios	596,275	55,925
Fixed assets of Alpha Bank S.A.	8,109	29,598
Investment Property of Alpha Leasing S.A.	903	22,616
Investment property of Alpha Investment Property Neas Erythreas S.A.	6,204	6,204
Investment Property of Subsidiaries in Cyprus		
- AGI-Cypre Alaminos Ltd	4,550	
- ABC RE P4 Ltd	800	
- ABC RE P5 Ltd	864	
- ABC RE COM Pafos Ltd	331	
Fixed Assets of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd	145	
Serdika 2009 E.O.O.D., Sheinovo Offices E.O.O.D., Sheinovo apartments E.O.O.D., Sheinovo Residence E.O.O.D.		15,838
Alpha Investment Property I A.E.		79,539
Alpha Investment Property Chanion A.E.		8,502
Other assets held for sale	4,810	7,598
<b>Total</b>	<b>669,208</b>	<b>272,037</b>

	30.9.2019	31.12.2018
<b>Liabilities related to assets held for sale</b>		
Alpha Investment Property I A.E.		1,592
Alpha Investment Property Chanion A.E.		11
<b>Total</b>	<b>-</b>	<b>1,603</b>

The Group began the process for the divestment of its participation in the joint ventures APE Commercial Property A.E. and APE Investment Property A.E., part of the retail and wholesale loan portfolios as well as part of investment properties of the Bank and of the Group subsidiaries in Greece Alpha Leasing S.A. and Alpha Investment Property Neas Erythreas S.A., and of the Group subsidiaries in Cyprus, AGI-Cypre Alaminos Ltd, ABC RE P4 Ltd, ABC RE P5 Ltd and ABC RE COM Pafos Ltd.

In addition certain property and equipment of the Group subsidiaries Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd were classified as assets held for sale, in the context of a relevant agreement which includes also the assignment of the management of a portfolio of non performing exposure of these subsidiaries.

Finally, during the nine month period of 2019, the sale of the entities Serdika 2009 E.O.O.D., Sheinovo Offices E.O.O.D., Sheinovo apartments E.O.O.D. and Sheinovo Residence E.O.O.D., which are subsidiaries of Stockfort Ltd, as well as the sale transactions of the subsidiaries Alpha Investment Property I A.E. and Alpha Investment Property of Chanion which had been classified as assets held for sale in 2018, were completed.

**APE Commercial Property A.E., APE Investment Property A.E.**

During the fiscal year 2016 the Bank began the process for the divestment of its participation in the joint ventures APE Commercial Property A.E. and APE Investment Property A.E. and the companies are classified as held for sale according to I.F.R.S. 5.

As far as APE Investment Property is concerned, the Group is at an advanced stage in the process of the divestment of its participation and, despite the specific characteristics and particularities of the company's assets, the Bank believes that a definite agreement will be reached in the near future. In addition, during 2018, the Bank participated in the share capital increase of APE Investment Property A.E. with an amount of € 71,704, whereas the company repaid the loan which had been granted by the Bank.





As far as APE Commercial Property is concerned, it should be noted that during September 2018 a share capital refund to the shareholders took place amounting to € 15,906, of which an amount of € 11,484 relates to the share capital refund to the Bank. According to I.F.R.S. 5 the assets held for sale or disposal groups are measured at the lower of carrying amount and fair value less cost to sell and are presented in the balance sheet separately from other assets and liabilities. As regards the joint ventures APE Commercial Property A.E. and APE Investment Property A.E., which were consolidated under the equity method, the Group estimated the fair value of its participation and of the loans and receivables of these companies which constitute part of the net investment in them. From the aforementioned estimation losses amounting to € 7,300 million arose in 2018 which were recognized in the caption "Gains less losses on financial transactions and impairments on Group companies" in the Income Statement, while for the nine month period of 2019 there was no result.

Taking into account that these companies are not a separate major line of business of the Group, the criteria to be classified as "discontinued operations" are not met. The companies are included in "Other / Elimination Centre" for operating segment disclosure purposes.

The table below presented an analysis of the discrete assets and liabilities of APE Commercial Property A.E. and APE Investment Property A.E. which are classified in the Balance Sheet as assets held for sale.

### Balance sheet

	30.9.2019	31.12.2018
<b>Assets</b>		
Investments in associates and joint ventures	58,961	58,961
	<b>58,961</b>	<b>58,961</b>
Valuation at fair value of APE	(12,744)	(12,744)
<b>Assets held for sale of APE</b>	<b>46,217</b>	<b>46,217</b>
<b>Amounts recognized directly in Equity related to assets held for sale</b>	<b>(122)</b>	<b>(122)</b>

### Non-Performing Loan portfolios

During 2018, the Group initiated the process for the sale of a non-performing wholesale loan portfolio in Greece. On 27.12.2018, the transfer of part of the above mentioned loan portfolio was completed. The transaction price for the disposed portfolio taking into consideration the transaction costs and other liabilities, amounted to € 258,833, while a loss of amount € 17,659 was recognized in the caption "Gains less losses on derecognition of financial instruments measured at amortised cost". The completion of disposal of the remaining portfolio, depends on certain conditions.

In addition, during 2019, the Bank initiated the process for the sale of Non-Performing loans collateralized by property, which included consumer, corporate, shipping and mortgage loans. The said portfolio is classified as at 30.9.2019 in "Assets held for sale" since the requirements of I.F.R.S. 5 are met, while its sale is expected to be completed within the first quarter of 2020.

The balance of the abovementioned loan portfolios stands at € 596,275 (31.12.2018: € 55,925), out of which an amount of € 552,437 (31.12.2018: € 31,152) is included in the segment "Corporate banking", an amount of € 19,056 is included in the operating segment of "Retail Banking" and an amount of € 24,782 (31.12.2018: € 24,773) is included in the segment "Investment Banking / Treasury" of note 24 "Operating Segment".

### Fixed assets of Alpha Bank S.A. and Investment Property of Alpha Leasing S.A.

In combination with the transaction concerning the abovementioned non-performing wholesale loan portfolio in Greece, the Bank and Alpha Leasing S.A. initiated the process of disposing of a portfolio consisting of investment property, own used property and property acquired from auctions. During the nine month period, the sale of a part of the Bank's and Alpha Leasing S.A. investment property, was completed at the transaction price of € 42,851, while from the transaction a gain amounting to € 652 was recognized.



On 30.9.2019 the remainder of this portfolio of properties met the criteria of “Assets held for sale” according to I.F.R.S. 5. The Group valued the said investment property at the lowest amount between the carrying amount and the fair value less cost to sell, from the valuation of which no result occurred, with carrying amount standing at € 9,012 on 30.9.2019.

It is noted that the Bank’s property (carrying amount: € 8,109) are included in “Other / Elimination Center” operating segment and the property of Alpha Leasing S.A. (carrying amount: € 903) are included in “Corporate Banking” operating segment of note 24 “Operating Segment”.

#### **Investment property of Alpha Investment Property Neas Erythreas A.E.**

During 2018, the subsidiary of the Bank, Alpha Investment Property Neas Erythreas A.E., signed, with an interested investor, a memorandum of understanding, for the disposal of part of its assets.

Based on the above, the investment property of Alpha Investment Property Neas Erythreas A.E. was classified as Held for sale as at 31.12.2018. The Group valued the investment at the lowest amount between the carrying amount and the fair value less cost to sell. From the aforementioned valuation no result occurred.

The said investment property is included in “Other / Elimination Center” for operating segment disclosure purposes.

#### **Investment Property of Subsidiaries in Cyprus**

The Group has initiated the process for the sale of the investment property of the Cypriot subsidiaries AGI-Cypré Alaminos Ltd, ABC RE P4 Ltd, ABC RE P5 Ltd and ABC RE COM Pafos Ltd and during the third quarter it was assessed that the criteria of “Assets held for sale” are met according to I.F.R.S. 5. Therefore, the properties were classified as Held for sale as of 30.9.2019. The Group measured the said investment property at the lowest between their carrying amount and their fair value less cost to and the losses of € 502 and € 196 that derived from AGI-Cypré Alaminos Ltd and ABC RE P4 Ltd respectively, were recognized in the caption “Other expenses” of Income Statement.

The said investment property is included in “South-Eastern Europe” for operating segment disclosure purposes.

#### **Fixed Assets of Alpha Bank Cyprus Ltd and AGI-Cypré Ermis Ltd**

During October of 2019, the subsidiaries Alpha Bank Cyprus and AGI-Cypré Ermis, signed a long term agreement with DoValue S.p.A. for the management of a Non-Performing Exposure portfolio and Real Estate Owned assets in Cyprus, which is estimated at approximately € 3.2 billion (gross book value). The agreement provided the establishment of a specialized company which will assume this operational activity of the subsidiaries, the properties and equipment as well as the employees of Alpha Bank Cyprus Ltd and AGI-Cypré Ermis Ltd which are involved in the specified operations under the current legislation. The agreement is subject to obtaining relevant approvals by the supervisory authorities. Therefore, and according to I.F.R.S. 5, only the property and equipment amounting to € 145 were classified as Held for sale as at 30.9.2019, without being classified as discontinued operation, as they do not consist of a significant part of the Group’s operational activities. The Group measured the abovementioned assets at the lowest between their carrying amount and the fair value less cost to sell, and no need for impairment recognition arose.

The abovementioned properties and equipment are included in the segment “South-Eastern Europe” for operating segment disclosure purposes.

#### **Serdika 2009 E.O.O.D., Sheinovo Offices E.O.O.D., Sheinovo Apartments E.O.O.D., Sheinovo Residence E.O.O.D.**

During 2018, the Bank and its subsidiary Stockfort Ltd signed with a prospective investor a pre-agreement (Pre-SPA) for the disposal of the subsidiaries Serdika 2009 E.O.O.D., Sheinovo Offices E.O.O.D., Sheinovo Apartments E.O.O.D. and Sheinovo Residence E.O.O.D. The main terms for the transfer of the 100% of the share capital of the entities were agreed with the investor during the third quarter of 2018. Based on the above, Serdika 2009 E.O.O.D., Sheinovo Offices E.O.O.D., Sheinovo Apartments E.O.O.D. and Sheinovo Residence E.O.O.D. were classified as held for sale as at 31.12.2018. The Group measured the assets and liabilities of the subsidiaries at the lowest between the carrying amount and the fair value, less cost to sell. The companies were included in “Other / Elimination Center” for operating segment disclosure purposes. On 19.3.2019 the



contract for the disposal of the total number of shares of the above mentioned entities was signed. The transaction price amounted to € 17,325 while a gain of € 1,487 was recognized in the caption "Gains less losses on financial transactions and impairments on Group companies".

#### **Alpha Investment Property I A.E.**

During the year 2018, the Bank initiated the process of obtaining binding offers for the disposal of its participation in Alpha Investment Property I S.A. and on 8.3.2019 the agreement with the preferred investor was signed, while the transaction was completed on 11.6.2019. The consideration of the transaction was € 91,180, while a gain of € 12,278 was recognized in "Gains less losses on financial transactions and impairments on Group companies".

Moreover, during the first semester of 2019, Alpha Investment Property I A.E. proceeded with a return of share capital amounting to € 15.174.

According to I.F.R.S. 5, Alpha Investment Property I A.E. was classified as Held for sale as at 31.12.2018 and 31.3.2019. The Group measured the assets and liabilities of the subsidiary at the lowest between their carrying amount and the fair value less cost to sell. From the aforementioned valuation no result occurred.

Taking into account that the company was not a separate major line of business of the Group, the criteria to be classified as "discontinued operations" were not met. The company was included in "Corporate Banking" for operating segment disclosure purposes.

#### **Alpha Investment Property Chanion A.E.**

During the year 2018, the Group initiated the process of obtaining binding offers for the sale of its participation Alpha Investment Property of Chanion A.E. According to I.F.R.S. 5, the company was classified as asset held for sale as at 31.12.2018 and 31.3.2019. The Group measured the assets and liabilities of the subsidiary at the lowest between the carrying amount and the fair value less cost to sell, and no result was recognised.

Taking into account that the company is not a separate major line of business of the Group, the criteria to be classified as "discontinued operations" were not met. The company was included in "Corporate Banking" for operating segment disclosure purposes.

On May 31, 2019, the sale of the Company's shares was completed. The consideration of the transaction was € 8,680, while a loss of € 37 was recognized in the "Gains less losses on financial transactions and impairments on Group companies".

#### **Other assets held for sale**

Other assets held for sale amount to € 4,810 (31.12.2018: € 7,598) and include Group's properties amounting to € 1,576. In addition, the Bank has classified its participations to "Selonda Aquaculture A.E.G.E.", "Nireus Aquaculture A.E.", "Forthnet A.E.", and "Attica the Department Store" as Assets held for sale since its intention is to dispose them in the near future. The fair value of "Selonda Aquaculture A.E.G.E.", "Nireus Aquaculture A.E." and "Forthnet A.E." was determined at the amount of one Euro each and of "Attica the Department Store" at € 3,234. On 5.9.2019 the sale of Bank's participation to Lion Rental A.E. was completed for an amount of € 3, with no result occurred.

During 2018, the Bank's participation in Unisoft S.A. was sold for a consideration of € 197. The sale did not result in any gain or loss.

The total of other assets held for sale for operating segment disclosure purposes are included in "South-Eastern Europe", with the exception of the above mentioned companies, which for operating segment disclosure purposes, are included in "Other / Elimination Center".

The Group examines at each reporting date the actions undertaken to assess whether the criteria for classification as held for sale under I.F.R.S. 5 criteria are met (as disclosed in note 1.18 of the Consolidated Financial Statements as at 31.12.2018) for assets and liabilities that are directly associated to these actions, to be classified as held for sale.



### 31. Corporate events

- a.** On 9.1.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded the company ABC RE COM Pafos Ltd for the amount of € 1 and on 29.1.2019, participated in its share capital increase through contribution in kind, for an amount of € 339.
- b.** On 18.1.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded the company ABC RE RES Larnaca Ltd for the amount of € 1.
- c.** On 18.1.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd founded the companies AGI-Cypre Property 25 Ltd and AGI-Cypre Property 26 Ltd for the amount of € 1 each.
- d.** On 5.2.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd founded the company AGI-Cypre P&F Pafos Ltd for the amount of € 1.
- e.** On 8.2.2019, the total shares of the Bank's subsidiary KITMA Holdings Ltd and its subsidiary company Vic City Srl., were sold for a consideration of € 1.
- f.** On 20.2.2019, the Bank's subsidiary Alpha Group Investments Ltd participated proportionally in the supplementary share capital increase of the associate Alpha Investment Property Elaionas A.E., paying an amount of € 2,500, following the initial payment of € 1,000, on 30.10.2018.
- g.** On 26.2.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd participated in the share capital increase through contribution in kind of AGI-Cypre Property 24 Ltd and AGI-Cypre RES Nicosia Ltd for an amount of € 653 and € 113 respectively.
- h.** On 6.3.2019, Alpha Group Investments Ltd participated in the share capital increase of Alpha Investment Property Neas Erythraias A.E. through contribution in kind for an amount of € 220.
- i.** On 8.3.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd founded the company AGI-Cypre Property 27 Ltd for the amount of € 1.
- j.** On 19.3.2019, the sale of the total shares of Sheynovo Offices E.O.O.D., Sheynovo Apartments E.O.O.D., Sheynovo Residence E.O.O.D. and Serdica 2009 E.O.O.D., was completed for a total amount of € 17,325.
- k.** On 19.3.2019, the total shares of the Group's subsidiary AGI-Cypre Property 1 Ltd were sold for an amount of € 1,200.
- l.** On 21.3.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded the company ABC RE L4 Ltd for the amount of € 1.
- m.** On 23.4.2019, the Bank participated in the share capital increase of its subsidiary Emporiki Development & Real Estate Management S.A for the amount of € 36,307.
- n.** On 24.4.2019, AGI-Cypre Ermis Ltd increased its share capital by a contribution in kind to AGI-Cypre Property 23 Ltd for the amount of € 3,328.
- o.** On 10.5.2019, the Bank's subsidiary, Alpha Bank Cyprus Ltd, founded the company ABC RE L5 Ltd for the amount € 1.
- p.** On 14.5.2019, the capital repayment of amount of € 15,174 of the subsidiary Alpha Investment Property I A.E. was completed.
- q.** On 20.5.2019, the Bank's subsidiary Alpha Group Investments Ltd, participated in the share capital increase of its subsidiary Alpha Investment Property Kallitheas A.E. for the amount of € 5,580.
- r.** On 23.05.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd increased its share capital by contribution in kind to AGI-Cypre RES Nicosia Ltd for an amount of € 138.
- s.** On 29.5.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd increased its share capital by contribution in kind to AGI-Cypre Property 22 Lt, AGI-Cypre Property 26 Ltd and AGI-Cypre P&F Limassol Ltd for the amount of € 2,380, € 1,357 and € 465 respectively.
- t.** On 31.5.2019, the sale of the total shares of the subsidiary company of Alpha Investment Property Chanion A.E was completed for a total consideration of € 8,680.
- u.** On 11.6.2019, the sale of the total shares of the subsidiary company of Alpha Investment Property I A.E. was completed for a total consideration of € 91,180.



- v.** On 18.6.2019, the Bank's subsidiary AGI-BRE Participations 2 Ltd increased its share capital by contribution in kind to AGI-BRE Participations 2 EOOD for an amount of € 70.
- w.** On 21.6.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd founded the companies AGI-Cypré Property 28 Ltd, AGI-Cypré Property 29 Ltd, AGI-Cypré Property 30 Ltd and AGI-Cypré COM Pafos Ltd for a price of € 1 each one.
- x.** On 24.6.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd increased its share capital by contribution in kind to AGI-Cypré P&F Nicosia Ltd and AGI-Cypré RES Nicosia Ltd for the amount of € 144 and € 196 respectively.
- y.** On 27.6.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd increased its share capital by contribution in kind to AGI-Cypré Property 21 Ltd for an amount of € 6,816.
- z.** On 28.6.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd increased its share capital by contribution in kind to AGI-Cypré Property 28 Ltd, AGI-Cypré Property 29 Ltd, AGI-Cypré Property 30 Ltd, AGI-Cypré RES Pafos Ltd, AGI-Cypré P&F Pafos Ltd and AGI-Cypré COM Pafos Ltd for the amount of € 1,394, € 961, € 1,297, € 296, € 134 and € 107 respectively.
- aa.** On 1.7.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd founded AGI-Cypré Property 31 Ltd and AGI-Cypré Property 32 Ltd, for the amount of € 1 each one.
- ab.** On 8.7.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd increased its share capital by contribution in kind to AGI-Cypré P&F Pafos Ltd for an amount of € 27.
- ac.** On 17.7.2019, the Bank's subsidiary Alpha Group Investments Ltd founded the company AIP Industrial Assets Athens S.M.S.A. with a share capital of € 20,000.
- ad.** On 18.7.2019, the Bank's subsidiary Alpha Group Investments Ltd founded the company Alpha Group Real Estate Ltd for a price of € 1 and on 13.8.2019 and 17.9.2019 increased its share capital by € 60,000 and € 60,000 respectively.
- ae.** On 24.7.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded the companies AGI-Cypré Property 33 Ltd and AGI-Cypré Property 34 Ltd for a price of € 1 each one.
- af.** On 26.7.2019, the Bank's subsidiary Alpha Group Investments Ltd increased its share capital of Alpha Trustees Ltd, AGI-BRE Participations 1 Ltd, Zerelda Ltd, AGI-RRE Athena Ltd, AGI-RRE Hera Ltd, AGI-BRE Participations 2 Ltd, AGI-RRE Ares Ltd, AGI-RRE Venus Ltd, AGI-RRE Cleopatra Ltd, AGI-RRE Hermes Ltd, AGI-RRE Arsinoe Ltd, AGI-SRE Ariadni Ltd and AGI-SRE Participations 1 Ltd for an amount of € 8, € 32, € 33, € 10, € 25, € 16, € 27, € 10, € 30, € 28, € 28, € 5, € 16 respectively.
- ag.** On 6.8.2019, the Bank's subsidiary AGI-Cypré Ermis Ltd acquired the total amount of shares of the entity Fierton Ltd for an amount of € 1,950.
- ah.** On 21.8.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded the entities ABC RE P&F Pafos Ltd, ABC RE P&F Nicosia Ltd, ABC RE RES Nicosia Ltd, for an amount of € 1 each one.
- ai.** On 23.8.2019, the Group's subsidiary Alpha Group Real Estate Ltd founded AIP Industrial Assets Rog S.M.S.A., AIP Attica Residential Assets I S.M.S.A., AIP Thessaloniki Residential Assets S.M.S.A., AIP Cretan Residential Assets S.M.S.A., AIP Aegean Residential Assets S.M.S.A., AIP Ionian Residential Assets S.M.S.A., AIP Attica Commercial Assets S.M.S.A., AIP Thessaloniki Commercial Assets S.M.S.A., AIP Attica Retail Assets I S.M.S.A., AIP Attica Retail Assets II S.M.S.A., AIP Attica Residential Assets II S.M.S.A., AIP Retail Assets Rog S.M.S.A., AIP Land II S.M.S.A and AIP Commercial Assets Rog S.M.S.A.
- aj.** On 11.9.2019 the Bank participated in share capital increase of its subsidiary Alpha Group Investments Ltd, by paying the amount of € 70,000.
- ak.** On 11.9.2019 the liquidation proceedings of the Group's subsidiary AGI-RRE Hermes Srl was completed.
- al.** On 13.9.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded the entities AGI-Cypré Property 35 Ltd, AGI-Cypré P&F Larnaca Ltd and ABC RE P6 Ltd for an amount of € 1 each one.
- am.** On 17.9.2019 the Group's subsidiary Alpha Group Real Estate Ltd proceeded to the payment for the initial share capital of the entities AIP Industrial Assets Rog S.M.S.A., AIP Land II S.M.S.A., AIP Attica Commercial Assets S.M.S.A., AIP Thessaloniki Commercial Assets S.M.S.A., AIP Attica Retail Assets I S.M.S.A., AIP Attica Retail Assets II S.M.S.A., AIP Retail Assets Rog S.M.S.A., AIP Aegean Residential Assets S.M.S.A., AIP Attica Residential Assets I S.M.S.A., AIP Attica Residential Assets II S.M.S.A., AIP Thessaloniki Residential Assets S.M.S.A., AIP Ionian Residential Assets S.M.S.A., AIP Cretan Residential Assets S.M.S.A. and AIP



Commercial Assets Rog S.M.S.A. for an amount of € 20,000, € 5,000, € 10,000, € 10,000, € 10,000, € 5,000, € 5,000, € 3,000, € 5,000, € 5,000, € 5,000, € 3,000, € 3,000 and € 10,000 respectively.

**an.** On 19.9.2019 and 20.9.2019, the Bank's subsidiary AGI-Cypre Ermis Ltd founded AGI-Cypre Property 37 Ltd and AGI-Cypre RES Ammochostos Ltd, respectively, for an amount of € 1 each one.

**ao.** On 25.9.2019, the Bank's subsidiary Alpha Bank Cyprus Ltd founded AGI-Cypre Property 36 Ltd for an amount of € 1.

**ap.** On 25.9.2019 the Bank's subsidiary Alpha Bank Cyprus Ltd proceeded to share capital increase through contribution in kind of ABC RE P&F Pafos Ltd for an amount of € 84.

**aq.** On 3.10.2019, the Group's subsidiary AGI-RRE Participations 1 Ltd proceeded to the increase of its ownership interest by 0.0014% in the share capital structure of Asmita Gardens Srl through share capital acquisition.

**ar.** On 4.10.2019 the Bank's subsidiary Alpha Bank Cyprus Ltd founded AGI-Cypre Property 38 Ltd and AGI-Cypre RES Larnaca Ltd for the amount of € 1 each one.

**as.** On 25.10.2019 the Bank's subsidiary, Alpha Bank Cyprus Ltd founded ABC RE P7 Ltd for an amount of € 1.

**at.** On 29.10.2019, the liquidation of Group's subsidiary Ashtrom Residents Srl was completed.

**au.** On 30.10.2019 the Bank's subsidiary Alpha Group Investments Ltd proceeded to payment against future share capital increase of AEP Attikis for the amount of € 298.

**av.** On 31.10.2019 the Bank participated in share capital increase of its subsidiary Alpha Group Jersey Ltd, by paying the amount of € 650.

**aw.** On 8.11.2019 the Bank proceeded to the proportional participation to the share capital increase of the associate entity Olganos A.E. by paying an amount of € 122.

**ax.** In June 2016 the United Kingdom (UK) voted to leave the European Union (EU). The formal withdrawal process and negotiations between the EU and the British Government began in 2017 and are still in progress. The EU countries and the United Kingdom Government decided to postpone the withdrawal, which was initially expected to take place in October 2019, to 31 January 2020 at the latest. In the event that the United Kingdom and the EU ratify the withdrawal agreement earlier, the United Kingdom will leave from the EU on the first day of next month. The Bank has limited presence in the United Kingdom and is in the process of considering the transfer of the London Branch activities to an EU country, in line with ECB's expectations. This transfer is expected to take place in the first half of 2020.

## 32. Restatement of financial statements

The Group modified the Balance Sheet as at 31.12.2017, following the evolution of the legal case of its subsidiary company Chardash Trading E.O.O.D. ("Chardash"), which operates in Bulgaria, as described in note 52 of the Consolidated Financial Statements as of 31.12.2018.

In particular, the Bulgarian Academy of Sciences had brought an action against the aforementioned subsidiary requesting the recognition of its ownership on the real estate and the acquisition of the occupation and possession of the land on which a multi-storey office building in Sofia had been established. After examining the case before the Sofia Court of Appeals, the action of the Bulgarian Academy of Sciences was accepted, while acknowledging Chardash's right to refuse the return of the property until the Bulgarian Academy of Sciences paid for the construction costs of the building.

As a result of the above, the Group considered that it was no longer exposed to risks and rewards of property and instead acknowledged the relevant claim for the payment of the construction costs as at 31.12.2017. In addition, the provision of the amount of € 8 million for this case was taken into account in determining the accounting value of the claim held by the Bulgarian Academy of Sciences.

In this context, during the current period the Group restated the Consolidated Income Statement, the Consolidated Statement of Comprehensive Income and the Consolidated Statement of Changes in Equity for the period from 1 January to 30.9.2018. Specifically, the depreciation of the period on the investment property was restated (taking into consideration that the





accounting recognition of the claim was realized on December 31, 2017), while the rentals received by the Company as well as the municipal taxes and expenses paid during the said period, formed the final amount to be received as a claim against the Bulgarian Academy of Sciences and Arts.

Furthermore, during the current period, the Bank amended the presentation of income and expenses incurred for the use of trademark of the organizations Visa, Mastercard and Diners, while it was decided the reform in the presentation of expenses charged by the use of trademark of the organizations Visa, Mastercard and Diners as well as of the income that results from discounts which depend on the trade volume by the use of these trademarks.

These amounts, that up to now were presented in the caption "General Administrative Expenses", constitute part of the result from the product "Credit Cards" and therefore from now on they will be included to caption "Commission Expense" and "Commission Income" of the Income Statement. This change in the presentation of these amounts was selected since it reflects in a more appropriate way the Banks' results without changing the period result.

The restated Consolidated Income Statement for the periods 1.1.2018 to 30.9.2018 and 1.7.2018 to 30.9.2018 is presented below:

	From 1 January to 30.9.2018			
	Published amounts	Restatement of profit / (loss) of Bank	Restatement of profit / (loss) of Chardash Trading E.O.O.D.	Restated amounts
Interest and similar income	1,720,970			1,720,970
Interest expense and similar charges	(391,531)			(391,531)
<b>Net interest income</b>	<b>1,329,439</b>	-	-	<b>1,329,439</b>
Fee and commission income	304,844	468		305,312
Commission expense	(56,957)	(3,563)		(60,520)
<b>Net fee and commission income</b>	<b>247,887</b>	<b>(3,095)</b>	-	<b>244,792</b>
Dividend income	758			758
Gain less losses on derecognition of financial assets measured at amortised cost	9,379			9,379
Gains less losses on financial transactions and impairments on Group companies	388,973			388,973
Other income	26,461		(246)	26,215
<b>Total other income</b>	<b>425,571</b>	-	<b>(246)</b>	<b>425,325</b>
<b>Total income</b>	<b>2,002,897</b>	<b>(3,095)</b>	<b>(246)</b>	<b>1,999,556</b>
Staff costs	(349,815)			(349,815)
General administrative expenses	(388,421)	3,095	156	(385,170)
Depreciation and amortization	(76,075)		500	(75,575)
Other expenses	(12,142)			(12,142)
<b>Total expenses before impairment losses and provisions to cover credit risk</b>	<b>(826,453)</b>	<b>3,095</b>	<b>656</b>	<b>(822,702)</b>
Impairment losses and provisions to cover credit risk on loans and advances to customers	(1,013,113)			(1,013,113)
Share of profit / (loss) of associates and joint ventures	93			93
<b>Profit / (Loss) before income tax</b>	<b>163,424</b>	-	<b>410</b>	<b>163,834</b>
Income tax	(110,114)			(110,114)
<b>Profit / (Loss) after income tax</b>	<b>53,310</b>	-	<b>410</b>	<b>53,720</b>
<b>Profit / (Loss) attributable to:</b>				
<b>Equity owners of the Bank</b>	<b>53,409</b>	-	<b>410</b>	<b>53,819</b>
Non-controlling interests	(99)			(99)
<b>Earnings / (Losses) per share</b>				
Basic and diluted (€ per share)	0.03	-	-	0.03



	From 1 July to 30.9.2018			
	Published amounts	Restatement of profit / (loss) of Bank	Restatement of profit / (loss) of Chardash Trading E.O.O.D.	Restated amounts
Interest and similar income	554,665			554,665
Interest expense and similar charges	(128,034)			(128,034)
<b>Net interest income</b>	<b>426,631</b>	-	-	<b>426,631</b>
Fee and commission income	107,113	468		107,581
Commission expense	(28,199)	(1,288)		(29,487)
<b>Net fee and commission income</b>	<b>78,914</b>	<b>(820)</b>	-	<b>78,094</b>
Dividend income	132			132
Gain less losses on derecognition of financial assets measured at amortised cost	(2,840)			(2,840)
Gains less losses on financial transactions and impairments on Group companies	137,593			137,593
Other income	8,081		(71)	8,010
<b>Total other income</b>	<b>142,966</b>	-	(71)	<b>142,895</b>
<b>Total income</b>	<b>648,511</b>	<b>(820)</b>	<b>(71)</b>	<b>647,620</b>
Staff costs	(115,742)			(115,742)
General administrative expenses	(132,510)	820	39	(131,651)
Depreciation and amortization	(25,956)		131	(25,825)
Other expenses	(1,199)			(1,199)
<b>Total expenses before impairment losses and provisions to cover credit risk</b>	<b>(275,407)</b>	<b>820</b>	<b>170</b>	<b>(274,417)</b>
Impairment losses and provisions to cover credit risk on loans and advances to customers	(313,613)			(313,613)
Share of profit / (loss) of associates and joint ventures	716			716
<b>Profit / (Loss) before income tax</b>	<b>60,207</b>	-	<b>99</b>	<b>60,306</b>
Income tax	(19,160)			(19,160)
<b>Profit / (Loss) after income tax</b>	<b>41,047</b>	-	<b>99</b>	<b>41,146</b>
<b>Profit / (Loss) attributable to:</b>				
<b>Equity owners of the Bank</b>	<b>41,066</b>	-	<b>99</b>	<b>41,165</b>
Non-controlling interests	(19)			(19)
<b>Earnings / (Losses) per share</b>				
Basic and diluted (€ per share)	0,03	-	-	0.03





The restated Consolidated Statement of Comprehensive Income is presented below:

	From 1 January to 30.9.2018			
	Note	Published amounts	Restatement of profits Chardash Trading E.O.O.D.	Restated amounts
<b>Profit / (loss), after income tax, recognized in the Income Statement</b>		<b>53,310</b>	<b>410</b>	<b>53,720</b>
<b>Other comprehensive income</b>				
<b>Amounts that may be reclassified to the Income Statement</b>				
Net change in securities reserves measured at fair value through other comprehensive income		(486,368)		(486,368)
Net change in cash flow hedge reserve		15,281		15,281
Exchange differences on translating and hedging the net investment in foreign operations		9,494		9,494
Change in proportion of other comprehensive income of associates and joint ventures		(149)		(149)
Income tax		134,095		134,095
<b>Amounts that may be reclassified in the Income Statement</b>		<b>(327,647)</b>	<b>-</b>	<b>(327,647)</b>
<b>Amounts that will not be reclassified in the Income Statement</b>				
Net change in actuarial gains / (losses) of defined benefit obligations		123		123
Gains / (losses) from shares measured at fair value through other comprehensive income		(80)		(80)
Income tax		(580)		(580)
<b>Amounts that will not be reclassified in the Income Statement</b>		<b>(537)</b>		<b>(537)</b>
<b>Total of other comprehensive income recognized directly in equity, after income tax</b>	11	<b>(328,184)</b>		<b>(328,184)</b>
<b>Total comprehensive income for the period, after income tax</b>		<b>(274,874)</b>	<b>410</b>	<b>(274,464)</b>
<b>Total comprehensive income for the period attributable to:</b>				
<b>Equity owners of the Bank</b>		<b>(274,775)</b>	<b>410</b>	<b>(274,365)</b>
Non controlling interests:		(99)	-	(99)



	From 1 July to 30.9.2018			
	Note	Published amounts	Restatement of profits Chardash Trading E.O.O.D.	Restated amounts
<b>Profit / (loss), after income tax, recognized in the Income Statement</b>		<b>41,047</b>	<b>99</b>	<b>41,146</b>
<b>Other comprehensive income</b>				
<b>Amounts that may be reclassified to the Income Statement</b>				
Net change in securities reserves measured at fair value through other comprehensive income		(189,851)		(189,851)
Net change in cash flow hedge reserve		16,734		16,734
Exchange differences on translating and hedging the net investment in foreign operations		(432)		(432)
Change in proportion of other comprehensive income of associates and joint ventures		(149)		(149)
Income tax		50,417		50,417
<b>Amounts that may be reclassified in the Income Statement</b>		<b>(123,281)</b>	<b>-</b>	<b>(123,281)</b>
<b>Amounts that will not be reclassified in the Income Statement</b>				
Net change in actuarial gains / (losses) of defined benefit obligations				
Gains / (losses) from shares measured at fair value through other comprehensive income		(2,362)		(2,362)
Income tax		271		271
<b>Amounts that will not be reclassified in the Income Statement</b>		<b>(2,091)</b>		<b>(2,091)</b>
<b>Total of other comprehensive income recognized directly in equity, after income tax</b>	11	<b>(125,372)</b>		<b>(125,372)</b>
<b>Total comprehensive income for the period, after income tax</b>		<b>(84,325)</b>	<b>99</b>	<b>(84,226)</b>
<b>Total comprehensive income for the period attributable to:</b>				
<b>Equity owners of the Bank</b>		<b>(84,306)</b>	<b>99</b>	<b>(84,207)</b>
Non controlling interests:		(19)	-	(19)

The change that occurred in the balances of Equity as at 30.9.2018 is presented below:

	Share capital	Share premium	Reserves	Retained earnings	Total	Non-controlling interests	Hybrid securities	Total equity
<b>Published balance 30.9.2018</b>	<b>463,110</b>	<b>10,801,029</b>	<b>519,721</b>	<b>(3,618,380)</b>	<b>8,165,480</b>	<b>28,717</b>	<b>15,107</b>	<b>8,209,304</b>
Restatement of profits Chardash Trading E.O.O.D.				410	410			410
<b>Restated balance 30.9.2018</b>	<b>463,110</b>	<b>10,801,029</b>	<b>519,721</b>	<b>(3,617,970)</b>	<b>8,165,890</b>	<b>28,717</b>	<b>15,107</b>	<b>8,209,714</b>



### 33. Events after the balance sheet date

**a.** On 30.10.2019, the Law 4635/2019 was published on Government Gazette (A' 167/30.10.2019) regarding the operation of General Commercial Registry (GCR), which aims to the modernisation and simplification of GCR's procedures, the establishment of a strict time frame for the publishment completion by GCR and the provision for sanctions in case that the entities fail to fulfill their obligations.

**b.** The Bank published an invitation for an Extraordinary General Meeting of shareholders for the purposes of adjusting Bank's Statute to the provisions of Law 4548/2018, according to the Article 183 paragraph 1 of the beforementioned law, the approval of Remuneration Policy, according to the provisions of Law 4548/2018 and the modification of Policy concerning the Compensation of Senior Management due to retirement from service.

Athens, 19 November 2019

THE CHAIRMAN  
OF THE BOARD OF DIRECTORS

THE CHIEF EXECUTIVE  
OFFICER

THE GENERAL MANAGER AND  
CHIEF FINANCIAL OFFICER

THE ACCOUNTING AND  
TAX MANAGER

VASILEIOS T. RAPANOS  
ID. No. AI 666242

VASSILIOS E. PSALTIS  
ID No AI 666591

LAZAROS A. PAPAGARYFALLOU  
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