



ALPHA BANK

CONDENSED INTERIM CONSOLIDATED FINANCIAL STATEMENTS AS AT 30.9.2020

(In accordance with International Accounting Standard 34)



Athens, 25 November 2020

TABLE OF CONTENTS

Condensed Interim Consolidated Financial Statements as at 30.9.2020

(In accordance with IAS 34)

Interim Consolidated Income Statement	3
Interim Consolidated Statement of Comprehensive Income	4
Interim Consolidated Balance Sheet	5
Interim Consolidated Statement of Changes in Equity	6
Interim Consolidated Statement of Cash Flows	8
Notes to the Condensed Interim Consolidated Financial Statements	9
GENERAL INFORMATION	9
ACCOUNTING POLICIES APPLIED	
1.1 Basis of presentation	11
1.2 Significant accounting judgments and key sources of estimation uncertainty	14
INCOME STATEMENT	
2. Net interest income	16
3. Net fee and commission income and other income	17
4. Gains less losses on financial transactions	20
5. Staff costs	21
6. General administrative expenses	22
7. Impairment losses and provisions to cover credit risk on loans and advances to customers	23
8. Impairment losses on other financial instruments	28
9. Income tax	28
10. Earnings / (Losses) per share	32
ASSETS	
11. Cash and Balances with Central Banks	33
12. Due from banks	33
13. Loans and advances to customers	33
14. Trading and investment securities	36
15. Investment property	38
16. Property, plant and equipment	40
17. Goodwill and other intangible assets	41
LIABILITIES	
18. Due to banks	42
19. Debt securities in issue and other borrowed funds	42
20. Provisions	47
EQUITY	
21. Share capital and Retained earnings	49
22. Hybrid securities	49
ADDITIONAL INFORMATION	
23. Contingent liabilities and commitments	50
24. Group Consolidated Companies	57

25. Operating segments	63
26. Exposure in credit risk from debt issued by the Greek State	65
27. Disclosures relevant to the fair value of financial instruments	66
28. Credit risk disclosures of financial instruments	74
29. Capital adequacy	84
30. Related-party transactions	86
31. Assets held for sale	88
32. Corporate events	92
33. Restatement of financial statements	96
34. Strategic Plan 2020 - 2022	97
35. Events after the balance sheet date	98



Interim Consolidated Income Statement

(Amounts in thousands of Euro)

	Note	From 1 January to		From 1 July to	
		30.9.2020	30.9.2019*	30.9.2020	30.9.2019*
Interest and similar income		1,414,985	1,530,972	451,601	498,039
Interest expense and similar charges		(261,346)	(370,835)	(69,845)	(114,860)
Net interest income	2	1,153,639	1,160,137	381,756	383,179
Fee and commission income		292,506	321,113	99,933	129,593
Commission expense		(40,997)	(74,119)	(15,085)	(33,996)
Net fee and commission income	3	251,509	246,994	84,848	95,597
Dividend income		2,525	671	1,731	105
Gains less losses on derecognition of financial assets measured at amortised cost		4,200	623	2,325	(476)
Gains less losses on financial transactions	4	252,044	276,780	39,617	80,349
Other income		17,513	29,351	5,082	6,936
Total other income		276,282	307,425	48,755	86,914
Total income		1,681,430	1,714,556	515,359	565,690
Staff costs	5	(321,754)	(341,910)	(107,998)	(112,278)
General administrative expenses	6	(340,185)	(341,624)	(117,033)	(114,512)
Depreciation and amortization	15, 16, 17	(115,132)	(107,248)	(39,238)	(35,336)
Other expenses		(11,298)	(32,831)	(4,321)	(17,827)
Total expenses before impairment losses and provisions to cover credit risk		(788,369)	(823,614)	(268,590)	(279,954)
Impairment losses and provisions to cover credit risk	7,8	(751,321)	(739,494)	(170,535)	(264,550)
Share of profit / (loss) of associates and joint ventures		(563)	(11,746)	187	(570)
Profit / (Loss) before income tax		141,177	139,702	76,421	20,616
Income tax	9	(10,600)	(48,173)	(32,534)	(15,949)
Net profit / (loss) for the period after income tax		130,577	91,529	43,887	4,667
Net profit / (loss) attributable to:					
Equity holders of the Bank		130,447	91,633	43,831	4,806
Non-controlling interests		130	(104)	56	(139)
Earnings / (Losses) per share					
Basic and diluted (€ per share)	10	0.08	0.06	0.03	0.003

* The Interim Consolidated Income Statement of the comparative period has been restated, as described in detail in note 33.



Interim Consolidated Statement of Comprehensive Income

(Amounts in thousands of Euro)

	Note	From 1 January to 30.9.2020	30.9.2019	From 1 July to 30.9.2020	30.9.2019
Net profit / (loss), after income tax, recognized in the Income Statement		130,577	91,529	43,887	4,667
Other comprehensive income					
Items that may be reclassified subsequently to the Income Statement					
Net change in investment securities' reserve measured at fair value through other comprehensive income		(215,508)	657,417	13,498	239,813
Net change in cash flow hedge reserve		15,603	(135,572)	5,239	(52,184)
Foreign currency translation net of investment hedges of foreign operations		(4,062)	(198)	(799)	(34)
Share of other comprehensive income of associates and joint ventures					
Income tax	9	54,037	(151,847)	(5,022)	(55,411)
Items that may be reclassified subsequently to the Income Statement		(149,930)	369,800	12,916	132,184
Items that will not be reclassified subsequently to the Income Statement					
Net change in actuarial gains / (losses) of defined benefit obligations		166		168	
Gains / (Losses) from equity instruments measured at fair value through other comprehensive income		3,801	(8,607)	1,367	908
Income tax	9	(1,633)	3,018	(647)	(234)
Items that will not be reclassified subsequently to the Income Statement		2,334	(5,589)	888	674
Other comprehensive income for the period, net of tax		(147,596)	364,211	13,804	132,858
Total comprehensive income for the period, net of tax		(17,019)	455,740	57,691	137,525
Total comprehensive income for the period attributable to:					
Equity holders of the Bank		(17,143)	455,847	57,636	137,664
Non controlling interests		124	(107)	55	(139)



Interim Consolidated Balance Sheet

(Amounts in thousands of Euro)

	Note	30.9.2020	31.12.2019
Assets			
Cash and balances with central banks	11	5,123,142	2,028,335
Due from banks	12	2,770,768	3,332,690
Trading securities	14	63,152	18,751
Derivative financial assets		1,288,749	1,009,193
Loans and advances to customers	13	39,807,793	39,266,269
Investment securities	14		
- Measured at fair value through other comprehensive income		7,091,510	7,557,499
- Measured at amortized cost		3,261,377	1,070,730
- Measured at fair value through profit or loss		56,505	55,541
Investments in associates and joint ventures		31,117	13,385
Investment property	15	512,012	485,836
Property, plant and equipment	16	825,335	852,332
Goodwill and other intangible assets	17	580,591	492,346
Deferred tax assets		5,321,198	5,174,297
Other assets		1,575,129	1,536,898
		68,308,378	62,894,102
Assets classified as held for sale	31	257,046	563,519
Total Assets		68,565,424	63,457,621
Liabilities			
Due to banks	18	13,241,950	10,261,283
Derivative financial liabilities		1,778,546	1,446,915
Due to customers		41,657,289	40,364,284
Debt securities in issue and other borrowed funds	19	1,435,405	1,088,693
Liabilities for current income tax and other taxes		102,108	39,873
Deferred tax liabilities		32,430	31,865
Employee defined benefit obligations		92,710	90,932
Other liabilities		1,104,297	1,057,844
Provisions	20	661,504	599,541
		60,106,239	54,981,230
Liabilities related to assets classified as held for sale	31	583	801
Total Liabilities		60,106,822	54,982,031
EQUITY			
Equity attributable to holders of the Bank			
Share capital	21	463,110	463,110
Share premium		10,801,029	10,801,029
Reserves		590,198	739,676
Amounts directly recognized in equity and associated with assets classified as held for sale		(3,495)	(122)
Retained earnings	21	(3,436,328)	(3,572,126)
		8,414,514	8,431,567
Non-controlling interests		29,304	28,951
Hybrid securities	22	14,784	15,072
Total Equity		8,458,602	8,475,590
Total Liabilities and Equity		68,565,424	63,457,621



Interim Consolidated Statement of Changes in Equity

(Amounts in thousands of Euro)

	Share capital	Share premium	Reserves	Amounts recognized directly in Equity related to assets held for sale	Retained earnings	Total	Non-controlling interests	Hybrid securities	Total
Balance 1.1.2019	463,110	10,801,029	460,025	(122)	(3,652,777)	8,071,265	28,814	15,107	8,115,186
Changes for the period 1.1 - 30.9.2019									
Net profit / (loss) for the period, after income tax					91,633	91,633	(104)		91,529
Other comprehensive income for the period, net of income tax			369,803		(5,589)	364,214	(3)		364,211
Total comprehensive income for the period, after income tax	-	-	369,803	-	86,044	455,847	(107)	-	455,740
(Acquisitions), Disposals, Share capital increase and other changes of ownership interests in subsidiaries						-	26		26
Appropriation of reserves			1,416		(1,416)	-			-
Other					(48)	(48)			(48)
Balance 30.9.2019	463,110	10,801,029	831,244	(122)	(3,568,197)	8,527,064	28,733	15,107	8,570,904
Changes for the period 1.10 - 31.12.2019									
Net profit / (loss) for the period, after income tax					5,377	5,377	219		5,596
Other comprehensive income for the period, net of income tax			(92,595)		(8,368)	(100,963)	(4)		(100,967)
Total comprehensive income for the period, after income tax	-	-	(92,595)	-	(2,991)	(95,586)	215	-	(95,371)
(Acquisitions), Disposals, Share capital increase and other changes of ownership interests in subsidiaries						-	3		3
Appropriation of reserves			1,027		(1,027)	-			-
(Purchases), (Redemptions) / Sales of hybrid securities, after income tax								(35)	(35)
Other					89	89			89
Balance 31.12.2019	463,110	10,801,029	739,676	(122)	(3,572,126)	8,431,567	28,951	15,072	8,475,590



(Amounts in thousands of Euro)

	Share capital	Share premium	Reserves	Amounts recognized directly in Equity related to assets held for sale	Retained earnings	Total	Non-controlling interests	Hybrid securities	Total
Balance 1.1.2020	463,110	10,801,029	739,676	(122)	(3,572,126)	8,431,567	28,951	15,072	8,475,590
Changes for the period 1.1 - 30.9.2020									
Net profit / (loss) for the period, after income tax					130,447	130,447	130		130,577
Other comprehensive income for the period, net of income tax			(149,924)		2,334	147,590	(6)		147,596
Total comprehensive income for the period, after income tax	-	-	(149,924)	-	132,781	17,143	124	-	17,019
Transfer of valuation of equity securities measured at FVTOCI recognized directly in Equity and related to assets held for sale			(122)	(3,373)	3,495	-			-
(Acquisitions), Disposals, Share capital increase and other changes of ownership interests in subsidiaries						-	229		229
Appropriation of reserves			570		(570)	-			-
(Purchases), (Redemptions) / Sales of hybrid securities, after income tax								(288)	(288)
Other			(2)		92	90			90
Balance 30.9.2020	463,110	10,801,029	590,198	(3,495)	(3,436,328)	8,414,514	29,304	14,784	8,458,602



Interim Consolidated Statement of Cash Flows

(Amounts in thousands of Euro)

	Note	From 1 January to 30.9.2020	30.9.2019
Cash flows from operating activities			
Profit / (Loss) before income tax		141,177	139,702
Adjustments of profit / (loss) before income tax for:			
Depreciation, impairment and net profit / (loss) from disposals of plant, property and equipment		62,027	64,288
Amortization and impairment of intangible assets		54,508	47,242
Impairment losses on financial assets and other provisions		782,475	787,767
Gains less losses on derecognition of financial assets measured at amortised cost		(4,200)	(623)
Valuation of financial assets measured at fair value through profit or loss		68,448	18,749
(Gains) / Losses from investing activities		(374,077)	(375,621)
(Gains) / Losses from financing activities		22,930	37,632
Share of (profit) / loss of associates and joint ventures		(13,741)	11,746
		739,547	730,882
Net (increase) / decrease in assets relating to operating activities:			
Due from banks		(441,572)	(412,939)
Trading securities and derivative financial instruments		(54,948)	(81,537)
Loans and advances to customers		(1,492,503)	(462,957)
Other assets		371,265	(67,256)
Net increase / (decrease) in liabilities relating to operating activities:			
Due to banks		2,980,668	(587,624)
Due to customers		1,293,137	875,684
Other liabilities		11,206	199,927
Net cash flows from operating activities before income tax		3,406,800	194,180
Income tax paid		(1,620)	(32,405)
Net cash flows from operating activities		3,405,180	161,775
Cash flows from investing activities			
Aquisition of Subsidiary		(41,963)	
Investments in associates and joint ventures		(21,601)	(2,500)
Proceeds from disposals of subsidiaries		16,155	117,166
Dividends received		2,525	671
Acquisitions of investment property, property, plant and equipment and intangible assets	15, 16, 17	(136,263)	(160,311)
Disposals of investment property, property, plant and equipment and intangible assets		30,824	53,482
Interest received from investment securities		164,511	152,896
Purchases of Greek Government Treasury Bills		(434,708)	(388,958)
Proceeds from disposal and redemption of Greek Government Treasury Bills		256,065	902,294
Purchases of investment securities (excluding Greek Government Treasury Bills)		(3,335,271)	(4,817,322)
Proceeds from disposal and redemption of investment securities (excluding Greek Government Treasury Bills)		1,766,467	3,731,959
Net cash flows from investing activities		(1,733,259)	(410,623)
Cash flows from financing activities			
Issuance of debt securities and other borrowed funds		495,863	196,906
Repayments of debt securities and other borrowed funds		(111,173)	(257,651)
Interest paid on debt securities in issue and other borrowed funds		(12,592)	(25,525)
Lease payments of assets		(37,050)	(21,233)
Net cash flows from financing activities		335,048	(107,503)
Effect of exchange rate changes on cash and cash equivalents		8,181	8,228
Net increase / (decrease) in cash flows		2,015,150	(348,123)
Cash and cash equivalents at the beginning of the period		3,402,328	2,247,144
Cash and cash equivalents at the end of the period		5,417,478	1,899,021



Notes to the Condensed Interim Consolidated Financial Statements

GENERAL INFORMATION

The Alpha Bank Group, (hereinafter the "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 S.A. (hereinafter the "Bank"), 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 Bank is managed by the Board of Directors, which represents the Bank and has the authority to decide on any action relating to the Bank's management, the management of its assets and the pursuit of its purpose. The tenure of the Board of Directors which was elected by the Ordinary General Meeting of Shareholders on 29.6.2018 expires at the Ordinary General Meeting of Shareholders in 2022.

The composition of the Board of Directors as at 30.9.2020 was as follows:

CHAIRMAN (Non Executive Member)

Vasileios T. Rapanos

EXECUTIVE MEMBERS

Vassilios E. Psaltis, Chief Executive Officer (CEO)

Spyros N. Filaretos, General Manager -
Chief Operating Officer (COO)

Artemios Ch. Theodoridis, General Manager
of Non Performing Loans and Treasury
Management

NON-EXECUTIVE MEMBER

Efthimios O. Vidalis */****

NON-EXECUTIVE INDEPENDENT MEMBERS

Dimitris C. Tsitsiragos **/***

Jean L. Cheval **/***

Carolyn Adele G. Dittmeier */****

Richard R. Gildea **/***

Elanor R. Hardwick */****

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 Board of Directors may set up an Executive Committee (the "Committee") in order to delegate certain powers and responsibilities. The Executive Committee (the "Committee") acts as the collective corporate body of the Bank. The powers

* Member of the Audit Committee

** Member of the Remuneration Committee

*** Member of the Risk Management Committee

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



and responsibilities of the Committee are set out in an Act of the Chief Executive Officer, which delegates powers and responsibilities to the Committee.

Indicatively, the Committee's main responsibilities include, but are not limited to, the preparation of the strategic plan, business plan and annual budget of the Bank and the Group in order to be submitted to the Board of Directors for approval, as well as the preparation of the annual and interim financial statements, the management of the funding allocation to the Business Units including decision making on it, the preparation of the Reports for the Internal Capital Adequacy Assessment Process (ICAAP) and the Internal Liquidity Adequacy Assessment Process (ILAAP), the review and approval of the Bank's policies, approval and management of any group employee schemes proposed by the Human Resources Division and ensuring the adequacy of governance, processes and systems related to Recovery Plan. Furthermore, the Committee is responsible for the implementation of the overall risk strategy – including risk appetite and the Bank's risk management framework- of an adequate and effective internal governance and internal control framework, the selection and evaluation process of the key management personnel, the distribution of both internal and regulatory capital, as well as the determination of the amount and their type for the achievement of the Bank's liquidity management objectives.

The composition of the Executive Committee as of 30.9.2020 was as follows:

CHAIRMAN

Vassilios E. Psaltis, Chief Executive Officer (CEO)

EXECUTIVE MEMBERS

Spyridon A. Andronikakis, General Manager - Chief Risk Officer (CRO)

Ioannis M. Emiris, General Manager of Wholesale Banking

Artemios Ch. Theodoridis, General Manager - Non-Performing Loans and Treasury Management

Lazaros A. Papagaryfallou, General Manager - Chief Financial Officer (CFO)

Isidoros S. Passas, General Manager of Retail Banking

Anastasia Ch. Sakellariou, General Manager - Chief Transformation Officer

Nikolaos V. Salakas, General Manager - Chief Legal and Governance Officer

Spyros N. Filaretos, General Manager - Chief Operating Officer (COO)

Sergiu-Bogdan A. Opreescu, General Manager of International Network

The Bank's share is listed in the Athens Exchange since 1925 and is included among the companies with the higher market capitalization. Additionally, the Bank's share participates in international indices, such as the FTSE All World, the FTSE4Good Emerging Index and MSCI Small Cap Index. Apart from the Athens Exchange, the Bank also has an ADR Over-the-Counter program in New York.

Total ordinary shares in issue as at 30 September 2020 were 1,543,699,381. In Athens Exchange are traded 1,374,525,214 ordinary shares of the Bank, while the Hellenic Financial Stability Fund ("HFSF") holds 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 article 7a of Law 3864/2010.

During the nine month period of 2020 the average daily volume of the share per session was € 6,369.

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

- Moody's: Caa1
- Fitch Ratings: CCC+
- Standard & Poor's: B
- Capital Intelligence: B+

These condensed interim consolidated financial statements have been approved by the Board of Directors on November 25, 2020.



ACCOUNTING POLICIES APPLIED

1.1 Basis of presentation

The Group has prepared the condensed interim financial statements for the current period ending at 30.9.2020 (the “interim financial statements”) in accordance with International Accounting Standard (IAS) 34, Interim Financial Reporting, as it has been adopted by the European Union.

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 31.12.2019, after taking into account the amendments to standards which were issued by the International Accounting Standards Board (IASB), adopted by the European Union and applied on 1.1.2020, regarding which further analysis is provided in note 1.1.2.

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

1.1.1 Going concern principle

The Group applied the going concern principle for the preparation of the interim financial statements. 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, to the liquidity levels of the Hellenic Republic and the banking system, as well as to the effects of the spread of coronavirus pandemic (Covid-19) in Europe in the first quarter of 2020.

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, 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.

The successful completion in August 2018 of the third financial support program of the Hellenic Republic provided the possibility of forming a cash buffer aiming at reducing any potential financial risks after the completion of the 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 1.3 of annual financial statements of 31.12.2019.

The emergence of coronavirus in Europe in the first quarter of 2020, which soon received pandemic features, is adding a major uncertainty in terms of both macroeconomic developments, mainly due to the restrictive measures imposed and the cost resulting from the financial support of sector business and private individuals mostly affected by the coronavirus. It is noted that on 4.5.2020 started the gradual removal of the pandemic-related restrictions of economic activity and as a result economic activity has been improved. However, since the beginning of November new restrictive measures have been applied, in many European countries and also in Greece, for the mitigation of the further spread of Covid-19 virus, leading to an adverse impact in economic growth in the last quarter of 2020. The adoption of restrictive measures is expected to adversely affect the



ability of borrowers to repay their liabilities and, consequently, the amount of expected credit risk losses, as mentioned in note 7. The financial implications depend to a large extent on how long this crisis will last and vary on a case-by-case basis as each sector of the economy is affected differently. In the context of efforts to relieve individuals and businesses most affected by the coronavirus and its associated restrictive measures, the Greek government has announced a package of tax and other relief measures, both in the former and in the current period in which the restrictive measures have been applied. In addition, credit institutions apply in turn relief measures to ensure timely payment of financial commitments of these borrowers. At the same time, the supervisory authorities of the systemic banks have adopted a number of measures to enhance the liquidity of credit institutions and also to facilitate the gradual absorption of the effects on the capital adequacy ratios, as specifically described in note 29, as well as in leverage ratios.

In particular regarding the Group's liquidity levels, it has been noted that there has been no adverse change due to Covid-19 in relation to the possibility to obtain liquidity through the mechanisms of the eurosystem and interbank repos transactions. In addition, the Group raised additional liquidity through TLTRO III ECB program and ensured long term liquidity with explicitly low interest rates.

Based on the above and taking into account:

- the Group's high capital adequacy (note 29),
- the satisfactory liquidity of the Group, which is based on the increase of the private sector deposits, long term financing from the European Central Bank, but also on the successful completion of the issuance on 13.2.2020 of a ten-year Tier 2 bond, of an amount of € 500 million, at a yield of 4.25%, receiving strong demand, and consequently on the significant enhancement of liquidity ratios (liquidity coverage ratio and net stable funding ratio),
- the actions taken by the Group for the management and decrease of the amount of non-performing loans, noting that despite the restrictive measures, on 30.4.2020 the finalization of loan securitization was achieved as the first step of the completion of the corporate transformation of the Bank, as described in note 34, while in addition under this framework the Board of Directors decided that on 1.6.2020 Alpha Bank's hive-down process would initiate by way of a spin-off and the establishment of a new entity was concluded, and the 30 June 2020 has been set as the Transformation Balance Sheet date,
- the amount of available eligible collaterals through which liquidity is ensured, to the extent required, through the mechanisms of the eurosystem or/and third sources, while taking note that ECB in accordance with decisions on March and April 2020 has rendered Greek governments bonds eligible as collateral in the eurosystem,
- the measures taken by the Group to protect its employees from coronavirus, the implementation of actions under the Business Continuity Plan and the activation of the ability for teleworking at a large scale whilst ensuring that critical operations are performed,
- the decisions of the eurozone countries to adopt a series of fiscal and other measures to stimulate the economy, according to which Greece is expected to receive € 32 bln from the recovery package for Europe "Next Generation EU" (€ 12.5 bln in the form of loans and approximately € 19,5 bln in the form of grants), and
- the decisions of banks supervisory authorities to provide liquidity and capital adequacy support to the extent that this is affected by the spread of the coronavirus.

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.

1.1.2 Adoption of new and amended standards

► **Amendment to International Financial Reporting Standard 3 "Business Combinations":** Definition of a Business (Regulation 2020/551/21.4.2020),

On 22.10.2018 the International Accounting Standards Board issued an amendment to IFRS 3 aimed at resolving the difficulties that arise when an entity determines whether it has acquired a business or a group of assets. The amendments:



- clarify the minimum requirements required in order a business to have been acquired,
- the assessment for the acquisition of either a business or a group of assets is simplified and it is based on current condition of acquired elements rather than on the market participant's ability to integrate them into his own processes,
- the definition of outputs is amended so that apart from the revenue arising from ordinary activities falling within the scope of IFRS 15, it also includes other income from main activities such as income from investment services,
- guidance is added to assess whether a production process is substantive both in cases where a product is produced at the date of acquisition and in cases where there is no product produced,
- an optional exercise is introduced based on the fair value of the assets acquired to assess whether a business or group of assets has been acquired.

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

► **Amendment to International Financial Reporting Standard 9** "Financial Instruments", to **International Accounting Standard 39** "Financial Instruments" and to **International Financial Reporting Standard 7** "Financial instruments: Disclosures": Interest rate benchmark reform (Regulation 2020/34/15.1.2020)

On 26.9.2019 the International Accounting Standards Board issued amendments to IFRS 9, IAS 39 and IFRS 7, according to which temporary exceptions from the application of specific hedge accounting requirements are provided in the context of interest rate benchmark reform.

In accordance with the exceptions, entities applying those hedge accounting requirements may assume that the interest rate benchmark is not altered as a result of the interest rate benchmark reform. Relief is provided regarding the following requirements:

- the highly probable requirement in cash flow hedge,
- prospective assessments,
- separately identifiable risk components.

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

► **Amendments to International Accounting Standard 1** "Presentation of Financial Statements" and to **International Accounting Standard 8** "Accounting Policies, Changes in Accounting Estimates and Errors: "Definition of material" (Regulation 2019/2104/29.11.2019)

On 31.10.2018 the International Accounting Standards Board, as part of the Disclosure Initiative, issued amendments to IAS 1 and IAS 8 to align the definition of 'material' across the standards and to clarify certain aspects of the definition.

The new definition states that information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. The amendments include examples of circumstances that may result in material information being obscured. The IASB has also amended the definition of material in the Conceptual Framework to align it with the revised definition of material in IAS 1 and IAS 8.

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

► **Amendments to International Accounting Standard 16** "Leases" (Regulation 2020/1434/9.10.2020)

On 28.10.2020 the International Accounting Standards Board issued amendment to IFRS16 in regards to the accounting treatment of rent concessions occurring as a direct consequence of the Covid-19 pandemic.

According to this amendment, a lessee may elect (practical expedient) not to assess whether a rent concession is a lease modification. The practical expedient is applied for any reduction in lease payments that affects only payments due on or before 30 June 2021.

If the practical expedient is applied, it is assumed that no lease modification has occurred and the lessee may account for the concession as a negative variable lease payment, by recognizing the variable payment in the statement of profit loss and making a corresponding adjustment to the lease.



The aforementioned practical expedient is not applicable for the lessors, who continue to apply the existing requirements of the Standard.

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

► **Amendments to references in the conceptual Framework in International Financial Reporting Standards**

(Regulation 2019/2075/29.11.2019):

On 29.3.2018 the International Accounting Standards Board issued a revised Conceptual Framework for Financial Reporting, which has been used immediately by the Board and the Interpretations Committee in the issuance of new Standards and Interpretations and become effective for the preparation of Financial Statements for annual periods beginning 1 January 2020. The revised Conceptual Framework includes a) new chapters for adding guidance regarding measurement, derecognition, presentation and disclosure and the definition of the reporting entity, b) update of the definition for assets and liabilities and recognition criteria and c) clarifications regarding the necessity of information for management stewardship in order to meet the objective of financial reporting, as well as the roles of prudence, measurement uncertainty and substance over form in assessing whether information is useful.

Together with the revised Conceptual Framework the IASB has also issued Amendments to references to the Conceptual Framework in IFRS Standards in order to ensure the consistency of the related references with the revised Conceptual Framework, but also to indicate which version of the Framework. The Conceptual Framework does not override the requirements of the IFRS Standards, but is used by the Group to assist for the development of consistent accounting policies for transactions or other events when no Standard applies.

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

1.2 Significant accounting judgments and key sources of estimation uncertainty

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.

The main judgments and estimates of the current period are not different from the ones described in the published financial statements for the year ended on 31.12.2019 with the exception of the changes that the Group introduced regarding the calculation of expected credit losses for exposures affected by the coronavirus pandemic, as described in note 7. In particular, for these exposures:

- Criteria were introduced according to which evidence is provided that moratoria up to 30.9.2020 are not classified as forbearance measures according to the European Banking Authority (EBA) definition,
- The Group has evaluated the amendment of the 30 days past due presumption of significant increase of credit risk from 30 to 60 days due and reached to the decision of not applying it, as it would not lead to significant changes.
- Retained in stage 1 exposures of Strong or Satisfactory rating that would be transferred to stage 2 only due to the application of the quantitative criteria of change in probability of default, and
- The Group has not changed the cure rate for customers that were already under modification terms for as long as the moratoria are effective.

In addition, as far as macroeconomic scenarios are concerned, the Group has made changes in the macroeconomic variables in order to incorporate the negative impact of the pandemic on the growth rate of the economy.

Furthermore, in order to assess the impact of the pandemic on borrower's cash flows, adjustments have been applied for expected losses for exposures that are individually assessed depending on the business sector of the borrower.

Regarding the assessment of the Covid-19 impact on the transactional behavior of retail borrower adjustments were applied on credit risk parameters associated with the cure rates. The result of the exercises was evaluated and taken into account when calculating the expected credit risk losses, adjusting the expected losses accordingly.



Finally, due to delays expected to the liquidation of collaterals, the assumed time of repossession of collaterals increased by one year, as compared to 31.12.2019, for both exposures that are assessed collectively and for those that are assessed individually and for which the recovery is not based on cash flows from operating activity (gone concern).

The impact from changes in the macroeconomic variables in the calculation of the expected credit losses of the period is explained in note 7.

Estimation of the Group's exposure to the Hellenic Republic (note 26)

The Group's total exposure to Greek Government securities and loans related to the Hellenic Republic is presented in note 26. 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. The spread of the coronavirus and the measures applied to slow the spread globally add a further source of uncertainty in terms of the development of macroeconomic conditions internationally, while at the same time Eurozone countries are taking measures to ensure that sufficient resources are available to address the effects of the pandemic, as well as to support the economies of member states. In addition, it is noted that during the third quarter of 2020 loans with guarantee provided by the Guarantee Fund for Covid-19 have been granted.

As far as debt sustainability is concerned and actions taken by the Hellenic Republic for its access to financial markets, information outlined in note 1.3 of annual financial statements for the year ended on 31.12.2019 is applicable. It is noted that to date there has been no adverse change with regards to the Greek sovereign credit rating. Nonetheless, credit rating agency Moody's has upgraded the credit rating of Greece to Ba3 with stable outlook, from B1 with stable outlook.

As a result, the Group estimates that there has been no significant increase in credit risk of on the Greek Government securities that it held as at 30.9.2020 since initial recognition. However, the Group assesses the developments relating to the Greek Government debt in conjunction with the market conditions and especially with the effects that the coronavirus may have on the growth of the Greece economy and reviews its estimations for the recoverability of its total exposure at each reporting date.

Recoverability of deferred tax assets (note 9)

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.

Regarding the main categories of deferred tax assets which have been recognized in the financial statements, what is stated in note 1.3 of annual financial statements for the year ended on 31.12.2019 is applicable. In addition, regarding the methodology applied for the assessment of the recoverability, what is mentioned in the note of the annual financial statements above is applicable, taking additionally into account the financial performance and results until the preparation of the financial statements of the current reporting period, as well as the updated estimations for the evolution of future financial performance expected after the implementation of the Group's business plan.

Furthermore, it is noted that deferred tax assets recognized in relation with the additional expected credit losses, mainly as a result of the Covid-19 pandemic, are recoverable based on the current estimates for the development of future profitability. However, the Group monitors developments in the economic environment and the effects of the pandemic and any adjustments in the estimate of future taxable profits will be considered when assessing recoverability of deferred tax assets in future periods.



INCOME STATEMENT

2. Net interest income

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019*	30.9.2020	30.9.2019*
Interest and similar income				
Due from banks	(4,491)	1,097	(3,609)	374
Loans and advances to customers measured at amortized cost	1,185,401	1,265,768	386,504	412,113
Loans and advances to customers measured at fair value through profit or loss	9,970	10,104	2,433	3,666
Trading securities	153	208	(2)	39
Investment securities measured at fair value through other comprehensive income	88,403	125,039	25,887	39,943
Investment securities measured at fair value through profit or loss	596	820	79	166
Investment securities measured at amortized cost	27,745	831	11,705	831
Derivative financial instruments	100,404	115,748	27,465	37,152
Finance lease receivables	5,463	10,330	342	3,721
Other	1,341	1,027	797	34
Total	1,414,985	1,530,972	451,601	498,039
Interest expense and similar charges				
Due to banks	13,695	(33,371)	12,482	(6,804)
Due to customers	(90,812)	(132,625)	(26,408)	(42,300)
Debt securities in issue and other borrowed funds	(27,116)	(15,422)	(9,453)	(4,833)
Lease liabilities	(3,502)	(4,225)	(1,192)	(1,348)
Derivative financial instruments	(102,083)	(126,594)	(28,237)	(41,084)
Other	(51,528)	(58,598)	(17,037)	(18,491)
Total	(261,346)	(370,835)	(69,845)	(114,860)
Net interest income	1,153,639	1,160,137	381,756	383,179

During the nine month period of 2020, net interest income decreased compared to the corresponding nine month period of the comparative period, mainly due to the decrease in interest income from the loan and bond portfolio as a result mainly of lower interest rates. This decrease was partially offset by the reduced cost on due to customers as a result of repricing of deposits, as well as on due to banks as a result of the substitution of interbank repos agreements (Repos) by the Eurosystem to negative interest rates, that has as a result the conversion of interest expenses to income.

"Interest income" includes an amount of € 59,422 relating to negative interest on interest-bearing assets, while "interest expense" includes an amount of € 48,783 relating to negative interest on interest-bearing liabilities.

* 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	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Loans	32,322	36,460	11,646	13,222
Letters of guarantee	33,435	34,491	11,431	11,822
Imports-exports	4,505	6,793	1,551	2,279
Credit cards	55,711	53,715	22,732	23,992
Transactions	30,758	34,257	11,114	12,126
Mutual funds	29,402	26,484	9,264	10,015
Advisory fees and securities transaction fees	1,944	970	254	473
Brokerage services	6,137	5,042	1,776	1,813
Foreign exchange fees	12,189	13,649	4,351	4,886
Other	45,106	35,133	10,729	14,969
Total	251,509	246,994	84,848	95,597

Net fee and commission income shows an increase in the nine month period of 2020 mainly due to modifications of collateral agreements (CSA agreements) that is included in caption "Other", also due to increase in commission income from mutual funds fees and an increase in commissions from credit cards deriving from greater transactions.

**Fee and commission income and other income**

The table below presents income from contracts per operating segment, that fall within the scope of IFRS 15:

From 1 January to 30.9.2020							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Fee and commission income							
Loans	4,940	21,727	360	5,262	731		33,020
Letters of guarantee	1,619	29,279	1	1,046	1,490		33,435
Imports-exports	864	3,209		1	431		4,505
Credit cards	61,886	21,985		159	7,161		91,191
Transactions	14,625	6,703	264	884	8,282		30,758
Mutual funds			29,328	68	6		29,402
Advisory fees and securities transaction fees		550	92	1,135	167		1,944
Brokerage services				6,979	129		7,108
Foreign exchange fees	8,122	2,970	21	732	344		12,189
Other	15,328	2,519	7,428	11,792	11,887		48,954
Total	107,384	88,942	37,494	28,058	30,628		292,506
Other income							
Hotel services					312		312
Gains from disposal of fixed assets		1			782	1,848	2,631
Other	4,351	142	52	664	1,273	3,994	10,476
Total	4,351	143	52	664	2,367	5,842	13,419

From 1 January to 30.9.2019							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Fee and commission income							
Loans	5,473	25,555	256	5,318	631		37,233
Letters of guarantee	1,523	30,770	2	611	1,585		34,491
Imports-exports	1,422	4,855		5	510		6,792
Credit cards	77,126	37,201	4	85	7,011		121,427
Transactions	15,195	8,271	305	712	9,774		34,257
Mutual funds			26,406	68	9		26,483
Advisory fees and securities transaction fees				848	123		971
Brokerage services				5,737	125		5,862
Foreign exchange fees	8,857	3,644	18	745	386		13,650
Other	16,666	6,589	7,137	260	9,296		39,948
Total	126,262	116,885	34,128	14,389	29,450	-	321,114
Other income							
Hotel services					1,577		1,577
Gain from disposal of fixed assets		1,116			2,710	1,544	5,370
Other	2,092	520	9	1,421	3,314	2,752	10,108
Total	2,092	1,636	9	1,421	7,601	4,296	17,055



From 1 July to 30.9.2020							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Fee and commission income							
Loans	1,475	8,230	355	1,552	266		11,877
Letters of guarantee	545	9,898	1	480	507		11,431
Imports-exports	288	1,088			175		1,551
Credit cards	24,370	8,705		73	2,804		35,952
Transactions	5,266	2,427	80	286	3,056		11,114
Mutual funds			9,239	22	2		9,264
Advisory fees and securities transaction fees				214	40		254
Brokerage services				2,016	41		2,057
Foreign exchange fees	2,989	986	6	245	125		4,351
Other	5,245	648	2,453	24	3,713		12,083
Total	40,178	31,981	12,134	4,913	10,728	-	99,933
Other income							
Hotel services					(3)		(3)
Gains from disposal of fixed assets		12			321	1,150	1,483
Other	3,026	37	19	509	345	914	4,850
Total	3,026	48	19	509	663	2,064	6,330

From 1 July to 30.9.2019							
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Fee and commission income							
Loans	1,978	10,078	135	1,116	194		13,501
Letters of guarantee	543	10,439	1	304	535		11,822
Imports-exports	490	1,609		2	177		2,278
Credit cards	36,543	16,325	3	42	2,569		55,482
Transactions	5,392	2,748	110	298	3,578		12,126
Mutual funds			9,989	22	3		10,014
Advisory fees and securities transaction fees				422	52		474
Brokerage services				2,084	35		2,119
Foreign exchange fees	3,204	1,217	7	314	145		4,887
Other	6,369	4,645	2,442	117	3,318		16,891
Total	54,519	47,061	12,687	4,721	10,606	-	129,594
Other income							
Hotel services					539		539
Gains from disposal of fixed assets		324			926	269	1,519
Other	804	39		(34)	297	741	1,847
Total	804	363	-	(34)	1,762	1,010	3,905

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



4. Gains less losses on financial transactions

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Foreign exchange differences	22,609	27,770	4,871	12,810
Trading securities:				
- Bonds	1,302	3,065	467	961
- Equity securities	(1,147)	2,329	(15)	347
Financial assets measured at fair value through profit or loss				
- Bonds	(252)	1,344	1,009	33
- Other securities	(2,731)	3,321	909	420
- Loans and advances to customers	(15,823)	(10,032)	(10,287)	1,322
Financial assets measured at fair value through other comprehensive income				
- Bonds and treasury bills	254,241	233,715	29,448	65,502
- Other securities				
Impairments / Sales of investments	236	12,056	318	
Derivative financial instruments	(24,059)	830	(1,563)	(1,790)
Other financial instruments	17,668	2,382	14,460	744
Total	252,044	276,780	39,617	80,349

Gains less losses on financial transactions of the nine month period of 2020 was mainly affected by:

- Gains of € 254,241 included in the caption "Bonds and treasury bills" of Financial assets measured at fair value through other comprehensive income, that relate to gains from sales of Greek Government Bonds and Treasury bills of € 257,005 and losses from other corporate and government bonds of € 2,814.
- Gains of € 14,303 included in caption "Other" concerns the valuation of the percentage of participation held by the Group before the acquisition of control of the company Cepal at fair value, as detailed in note 24.
- Loss of € 15,823 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.
- Loss amounting to € 15,589 included in the caption "Derivative financial instruments" that concerns the Credit Valuation Adjustment of transactions with the Greek State.

Gains less losses on financial transactions of the nine month period of 2019 was mainly affected by:

- Gains of € 233,715 included in the caption "Bonds and treasury bills" of financial assets 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 attributed to the change in their fair value within the nine month period of 2019.
- Gains of € 12,056 from "Impairments / Sales of investments" that includes the gain of € 12,278 from the disposal of the subsidiary Alpha Investment Property I A.E.



5. Staff costs

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Wages and salaries	235,580	245,536	79,268	81,132
Social security contributions	56,273	64,445	18,326	21,121
Expenses for employee defined benefit programmes of Group	2,484	2,762	828	921
Other charges	27,417	29,167	9,576	9,104
Total	321,754	341,910	107,998	112,278

Staff costs have been positively affected by the reduction of staff headcount employed by the Bank due to the departure of employees that participated in the 2019 voluntary exit scheme of the Bank.

The captions “Wages and Salaries” and “Social security contributions” have been charged with costs relating to staff incentive schemes.

Specifically, the Bank, from the last quarter of 2018, recognizes provisions for the cost of the Sales Incentive Program and the Performance Incentive Program following the relative Board of Directors’ approval. In the nine months period of 2020 and the corresponding period of 2019, the results were affected by an amount of € 3,041 and € 3,700 respectively, regarding these programs.

In addition, the nine months of 2020 have been affected by an amount of € 2,368 related staff costs of Cepal consolidated for the first time, as detailed in note 24.



6. General administrative expenses

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019*	30.9.2020	30.9.2019*
Lease expenses	813	785	264	322
Maintenance of EDP equipment	16,300	14,175	5,203	4,943
EDP expenses	20,969	22,232	7,489	7,363
Marketing and advertising expenses	12,386	15,065	4,188	4,294
Telecommunications and postage	11,895	13,280	4,395	3,611
Third party fees	46,258	38,991	14,418	11,784
Contribution to the Deposit / Investment Coverage Scheme and to the Resolution Scheme	44,628	42,722	14,102	13,045
Fees to debt collections agencies	2,831	7,699	434	2,370
Financial services fees	7,232	7,314	2,512	2,724
Insurance	7,550	7,322	2,707	2,390
Electricity	6,318	6,999	2,245	2,487
Building and equipment maintenance	5,431	5,591	1,791	1,757
Security of buildings-money transfers	10,927	11,164	3,734	4,073
Cleaning expenses	4,222	3,980	1,471	1,339
Consumables	3,080	3,159	1,639	1,103
Commission for the amount of Deferred tax Asset guaranteed by the Greek Government	4,009	4,128	1,284	1,338
Taxes and Duties (VAT, real estate tax etc.)	67,536	66,935	24,028	24,665
Other	67,802	70,083	25,129	24,904
Total	340,185	341,624	117,033	114,512

General administrative expenses presents a decrease in the nine month period of 2020 compared to the corresponding nine month period of the comparative period, which is mainly due to the decrease in expenses that are related to the collection of overdue loans, due to the effect of Covid-19 pandemic and the relative measures to facilitate the borrowers in the management of their loans, as well as due to cost-cutting actions of specific costs such as advertising and postage expenses.

"Lease expenses" includes short term lease expenses, lease expenses concerning low value items and variable leases expenses, that are not included in lease liabilities.

Finally, the nine months of 2020 it has been affected by an amount of € 1,295 relating to general administrative expenses of Cepal consolidated for the first time, as detailed in note 24.

* Certain figures of the previous period have been restated, as described in detail in note 33.



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

"Impairment losses and provisions to cover credit risk" for the period from January 1 to September 30, 2020 amounting to € 751,321 (30.9.2019: € 739,494) as well as for the period from July 1 to September 30, 2020 amounting to € 170,535 (third quarter of 2019: € 264,550) includes the amounts presented in the table below, as well as the impairment losses on other financial instruments, which are presented in note 8.

The following table presents the impairment losses and provisions to cover credit risk on loans and advances to customers:

	From 1 January to 30.9.2020		From 1 July to 30.9.2019	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Impairment losses on loans	669,948	554,121	145,945	212,620
Impairment losses on advances to customers	2,103	11,094	4,008	11,436
Provisions for other contingent liabilities (note 31)	25,000			
Provisions to cover credit risk on letters of guarantee, letters of credit and undrawn loan commitments (note 20)	4,294	11,707	6,844	2,694
(Gains) / Losses from modifications of contractual terms of loans and advances to customers	51,328	195,379	17,334	41,967
Recoveries	(16,037)	(22,275)	(5,547)	(7,211)
Total	736,636	750,026	168,584	261,506

The impairment losses of the current period include an amount of € 287 million which relates to the impact of the global economic crisis caused by the Covid-19 pandemic. The above impact is mainly due to deterioration of the macro parameters used in the models to calculate expected credit losses. Detailed information with regards to the impact of Covid-19 pandemic on impairment losses follow below.

Effect from the Covid-19 pandemic

Perimeter affected by the Covid-19 pandemic

The Group, in order to support its customers who are affected or expected to be affected by the crisis due to the Covid-19 pandemic, has taken, and will continue to take, a series of measures.

These measures concern either new loans, in the context of strengthening the liquidity of small, medium and large business, as well as the self-employed, or modifications in the repayment schedules of existing loan of both businesses and individuals.

Moreover, the Bank actively participates in every effort planned and coordinated by the Greek Government, either through the competent Ministries or through the Hellenic Development Bank and other European institutions to support the Greek economy (TEPIX, European Investment Fund, COSME etc.).

The modifications granted to existing loans were treated by the Bank in line with the Guidelines issued by the European Banking Authority (hereinafter "EBA") "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/08) that aim to provide clarity to the EU banking sector on how to handle in a consistent manner, aspects related to (i) the classification of loans in default and (ii) the identification of forbore exposures.

In this respect, provided that those measures are not borrower-specific, the payment moratorium is fixed for every borrower irrespective of the borrowers' specific financial circumstances and the Net Present Value ("NPV") loss is immaterial, modifications in payment schedules are not automatically classified as Distressed Restructuring (Forbearance) both under IFRS 9 and the definition of default.

In accordance with the Bank's accounting policy, these modifications are not considered significant and therefore no derecognition occurs.



The measure of temporary payment holidays is offered to customers operating or employed in sectors affected by the Covid-19 pandemic, which is assessed by the Bank, through the submission of a relevant request from the customer.

It is noted that this measure, based on relevant guidelines by the EBA, and unless there is any other modification or development, was completed on 30.9.2020, meaning that approvals of customer requests for payment holidays were accepted until that date.

Characteristics of private and public moratoria

In order to support affected corporates and individuals, both legislative and non-legislative measures / actions have been undertaken by the Government and the Bank, according to the above guidelines by EBA.

► The **supportive measures** provided by the Bank were the following:

For **Medium and Large corporates** operating in sectors or areas affected by the Covid-19 crisis and provided that they were performing (less than 90 days past due) as at February 28, 2020:

- Payment holiday for capital installments due from 1.3.2020 to 31.12.2020 to the end of the loan or distribution among the remaining installments.
- Installments that include interest and capital due from 1.3.2020 to 31.12.2020, could be distributed equally among the remaining installments of the loan.
- Capitalization of interest accrued until 31.12.2020 or another date as decided.
- Extension of the obligation to recycle revolving loans until 31.12.2020.
- Possibility of replacing post-dated checks, received as collateral, with other checks from the same issuer of a later date, after an updated creditworthiness control.

For **Small businesses** and self-employed operating in sectors or areas affected by the Covid-19 crisis and provided that they were performing (less than 90 days past due) as at February 28, 2020:

- Payment holiday for capital installments due from 1.3.2020 to 31.12.2020 at the end of the loan.
- For borrowers with fixed term loans possibility to capitalized installments due until 31.12.2020 or another date as decided
- Extension of the obligation to recycle revolving loans until 31.12.2020
- Possibility of replacing post-dated checks received as collateral, with other checks from the same issuer of a later date, after an updated creditworthiness control.

For **individuals** that faced limitation or decrease in their income because they belong to sectors that are affected, and which have fixed term loans (consumer and mortgage), credit cards and open personal loans with less than 90 days past due as at February 28, 2020:

- Payment holiday of the installments due or the minimum amount due for cards and open personal loans until 31.12.2020.
- Capitalization of the contractual interest, during the suspension period, as well as any expenses (e.g. insurance premiums), in the balance of the loan on due dates.

All loan modifications are flagged in the Bank's systems, so that the Bank is able to monitor them.

Until 30.9.2020, in the context of the aforementioned moratoria, the Group has implemented modifications that remain active amounting to € 4.2 billion.

► Additionally, the **supportive measures undertaken by the Greek State** are as follows:

- Provision for working capital to deal with the consequences of the COVID 19.

In order to enhance the liquidity of the companies, working capital funds are provided which are co-financing and interest subsidy under the Action - "TEPIX II Business Financing" and with 80% guarantee from the "COVID 19 Business Guarantee Fund" in cooperation with the Hellenic Development Bank



- Interest Subsidy of corporate loan installments.
- Interest subsidy on existing loans from small and medium-sized companies affected by the Covid-19 measures
Companies in the affected sectors were able to subsidise interest on their business loans for up to five (5) months, from 1.4.2020 to 31.8.2020.
- Suspension of maturity dates, the appearance and payment of securities by 75 days, according to the Government Act / Law A' 75/30.3.2020, and in addition the Law A' 104/30.5.2020 and Law A' 161/22.8.2020 for tourist companies.

For companies belonging in the Nace codes with suspension of their activity by state order or have been severely affected by the Covid-19 pandemic, the maturity, appearance and payment of checks are suspended by 75 days from the expiration date.

- Suspension of Announcements in Teresias S.A. of affected companies by Covid-19, based on Law 4701/30.6.2020 and Law 4738/27.10.2020 (Government Gazette A'-207)
- Suspension of installment payment deadlines, according to Government Act A' 75/30.3.2020.

For debtors who are proven to be affected by the Covid-19 crisis, the payment of installments is suspended for a period of three (3) months regarding loans in the context of regulations of Laws 4469/2017, 4605/2019 and 3869/2010 (A' 130), without the consequences due to non-payment and without modifying the total duration of the regulation.

As at 30.9.2020, based on the above supportive measures, the active amounts granted by the Group approximate € 1.7 billion.

Amendments in the Group loan impairment policy

The Group Loan Impairment Policy has been amended, in line with the EBA Guidelines "on legislative and non-legislative moratoria on loan repayments applied in the light of the Covid-19 crisis" (EBA/GL/2020/08), to incorporate the distinct treatment of the exposures which are affected by the Covid-19 pandemic. The Group, for these exposures, has included in its Policy the criteria for the the Forbearance Classification, the Unlikelihood-to-pay (UTP) assessment, the identification of Default and the Significant Increase in Credit Risk treatment.

The Group carefully assesses the extent to which, amongst other facts, the high degree of uncertainty and any sudden changes in the short-term economic outlook are expected to result in impacts over the expected life of exposures. In doing so, obligors are distinguished between those for which the credit standing is not expected to be significantly affected by the current situation in the long term, from those that is considered unlikely to restore their credit worthiness.

According to the EBA Guidelines, the public and private moratoria, as a response to Covid-19 pandemic to the extent they are not borrower specific but rather addressed to broad ranges of product classes or customers, should not be automatically classified as forbearance measures, or according to the definition of default under IFRS 9. This type of restructuring should not be automatically considered as a distressed restructuring, on the contrary it has to be considered a suitable measure to give relief to borrowers, which are temporarily not able to serve their loan obligations due to Covid-19 disruptions. In addition the Bank assess in a regular basis that the credit standing of the obligor is not expected to be significantly affected by the current situation in the long term.

Calculation of expected credit losses

In order the Bank to cope with obligors who face temporary liquidity problems due to the Covid-19 crisis, established the following adjustments to the calculation of expected credit losses. More specifically, the amendment of the minimum delay criterion of more than 60 days instead of 30 days was evaluated, without this being applied, as it would not lead to significant changes.

Additionally, the maintenance to Stage 1 of exposures which were transferred to Stage 2 only due to the application of the quantitative criterion and simultaneously are under Rating Classification: Strong or Satisfactory, has been assessed. From the above mentioned assessment no change occurred in the exposures classification.



For all loans that were already under modification terms and for which a Covid modification has been provided, based on the above mentioned measures that the Group applied, the cure rate remains unchanged for the period of the Covid modification.

In order to assess the impact of the pandemic on the cash flows of the borrowers for which the exposures are assessed on an individual basis for the estimation of expected credit losses, adjustments were made to the estimated credit losses depending on the sector of activity of the borrower.

Additionally, in order to address the delays anticipated in the liquidation of collaterals, the expected time period for the recovery of the fixed collaterals has been increased by one year compared to 31.12.2019, both for the exposures subject to collective assessment and to individual assessment and for which the recovery is not based on cash flow from operating activities (gone concern).

Finally, in order to assess the impact of the pandemic on the transactional behavior of retail borrower, the exposures of which are primarily unsecured, adjustments were conducted on credit risk parameters associated with the cure rates.

For the purposes of determining the expected credit losses, the Bank calculates the expected cash flows based on the weighted probability of three scenarios. More specifically, the Economic Research Division of the Bank produces forecasts for the possible evolution of macroeconomic variables that affect the level of expected credit losses of loan portfolios under a baseline and under two alternative macroeconomic scenarios (an upside and an adverse) and produces the cumulative probabilities associated with these scenarios.

The macroeconomic variables affecting the level of expected credit losses are the Gross Domestic product (hereinafter "GDP"), the unemployment rate and forward-looking prices of residential and commercial real estates.

As at 30.9.2020, the Bank has introduced a suite of scenarios envisaging growth rates for 2020, ranging from -7% (upside) of V-scheme with a speedy return to its pre-Covid-19 upward path to -10% (adverse scenario) of Nike Swoosh scheme with domestic economic activity broadly stagnating over the medium-term.

The abovementioned approach derives from the current juncture, as heightened uncertainty surrounds the domestic economic outlook. The negative impact of Covid-19 pandemic on the domestic growth is expected to be determined, among other factors, by:

- (a) The intensity and duration of the pandemic phenomenon,
- (b) The scale and effectiveness of containment efforts along with the size and the speed of the fiscal and monetary policy responses,
- (c) The effects of quarantines and social distancing on spending and consumption, as well as,
- (d) The extent of escalating uncertainty and supply chains disruptions.

The **main features** of these scenarios can be narrated as follows:

Baseline Scenario (cut-off date: 24.9.2020)

The baseline scenario foresees a negative incomplete V-shaped shock for two years 2020-2021. This negative impact on the domestic economic activity is expected to stem from:

- A demand-side shock, affecting Greek exports of goods and services (transport, shipping and tourism), given also that EU is the most important export market for Greece, as well as, domestic consumption and investment. However, the reduction in imports, due to the weakening of the domestic demand and the lower oil prices are expected to partially mitigate the negative consequences on GDP growth within 2020. High uncertainty is expected to weigh on investment; however, this impact may be relatively limited given the current low share of investment in GDP.
- A supply-side shock, related to the lockdown measures in several sectors of the economy;
- Adverse, albeit temporary, confidence effects weighing on aggregate demand.

The broad-based fiscal response supports aggregate domestic demand and weakens the negative effects on the



economic activity and confidence, while setting the stage for a swift, although partial, recovery in the medium-term. The scenario entails a rise in the unemployment rate in the current year, before resuming again its downward path.

Regarding the real estate prices, their growth rate has been slowed down compared to the initial forecasts (December 2019), both for 2020 and cumulative for the period 2020-22, due to the worsening of the economic activity due to Covid-19 pandemic. The impact is reflected in parallel to the economic variables of unemployment and GDP. Besides, GDP's growth rate is included within the main determining factor of the real estate properties prices.

The aforementioned mild deceleration of Bank's assessment for the real estate properties prices regarding year 2020 and afterwards (i.e. from 5,3% to 3,5% on an annual basis for the current year) is significantly connected with the enrichment of our analysis with the historical data for the first quarter (+6,9% on an annual basis) and for the second quarter (+4,1% on an annual basis) of BoG's ratio, which has been published recently. This progress indicates an inelasticity of the residential properties' prices against GDP's changes on the present V-shaped recession shock. The baseline scenario foresees a decrease in commercial real estate properties prices within the current year and then a return to an increasing trend.

Upside Scenario

Under an upside scenario, the pathway of the pandemic is shorter than initially anticipated. The economy is assumed to recover fully and return soon to its upward path to normality after a lockdown related temporary shock of smaller magnitude, also supported by the broad - based stimulus from fiscal and monetary policy responses. The unemployment rate is assumed to increase in the current year followed by a steeper decline in the medium term, in line with the stronger rebound of the economic activity. The real estate prices maintain their pre-Covid-19 dynamic assisted also by other structural factors apart from the rise of construction activity.

Adverse Scenario

The adverse scenario features a negative imperfect Nike Swoosh shaped shock on the domestic economic activity (i.e. partial recovery of losses in GDP terms in a 3-year period), envisaging a steeper drop in 2020 and muted recovery dynamics over the medium-term. The scenario reflects higher intensity and persistence of the pandemic, interrelated with some combination of potential downside risks, with broader negative spillover effects across the economy. The unemployment rate returns to the pre-Covid level in 2022. Real estate prices lose the increasing dynamic of prior years without, however, these changes receiving a negative sign.

The changes of the macroeconomic variables, the adjustments of cash flows and of credit risk parameters resulted in an increase in Expected Credit Losses by € 287 million for the nine month period of 2020.

The probabilistic weighting assigned to the baseline scenario is 60%, while the probabilistic weighting for the adverse and upside scenario is 20% for each of the scenarios.

In case the weighting of the adverse scenario increases from 20% to 40%, the Expected Credit Losses are expected to increase by € 78,2 million as at 30.9.2020 (31.12.2019: € 84,0 million). In case the weighting of the upside scenario increases from 20% to 40%, the Expected Credit Losses are expected to decrease by € 78,2 million as at 30.9.2020 (31.12.2019: € 83,9 million).



8. Impairment losses on other financial instruments

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Impairment losses of debt securities and other securities measured at amortized cost	11,156	2,698	623	2,698
Impairment losses of debt securities and other securities measured at fair value through other comprehensive income	3,512	(13,182)	1,345	375
Impairment losses on due from banks	17	(48)	(17)	(29)
Total	14,685	(10,532)	1,951	3,044

The expected credit losses on debt securities for the nine month period of 2020, are mainly attributed to the Greek Government bonds and bonds of other issuers included in the debt securities portfolio measured at amortized cost. It is noted that the pandemic of Covid-19 did not result in a significant increase of the credit risk in the Group's debt securities position. The positive impact on expected credit losses on debt securities measured at fair value through other comprehensive income during the nine month period of 2019 derive from the upgrading of the Hellenic Republic credit rating by Moody's from B3 to B1 on 1.3.2019.

9. Income tax

According to article 22 of Law 4646/12.12.2019 "Tax reform with a growth dimension for tomorrow's Greece", the nominal corporate income tax rate in Greece reduced to 24% for tax years 2019 onwards. By explicit reference to the law, this reduction does not apply to credit institutions for which the tax rate is still 29%.

Article 20 of the same law provides that Greek legal persons are exempt from tax on capital gains deriving from the disposal of shares in legal entities that reside in EU member states, based on certain conditions prescribed by law. The capital gain is not subject to income tax upon capitalization or distribution. Any impairment losses recognized as at 31.12.2019 are deducted, under certain conditions, from gross income at the time of transfer. The new provision applies for income generated from 1 July 2020 and onwards.

Furthermore, the withholding tax on dividends is reduced from 10% to 5% for the tax year commencing from 1 January 2020.

For the Bank's subsidiaries and branches operating in other countries, the applicable nominal tax rates for the year 2020 are as follows, with no changes compared to the tax rates of year 2019:

Cyprus	12.5	Albania	15
Bulgaria	10	Jersey	10
Serbia	15	United Kingdom	19
Romania	16	Ireland	12.5
Luxemburg	24.94		

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. 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 certificated has been obtained without any qualifications on the tax issues covered. For fiscal year 2019 the tax audit carried out by the statutory auditors is in progress.



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

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Current tax	101,260	10,099	11,567	4,250
Deferred tax	(90,660)	38,074	20,967	11,699
Total	10,600	48,173	32,534	15,949

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	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Debit difference of Law 4046/2012	33,416	33,416	11,139	11,139
Debit difference of Law 4465/2017	(1,691,634)	(18,877)	(256,059)	(23,368)
Write-offs and depreciation of plant, property and equipment and leases	13,626	12,226	4,530	5,248
Loans	1,643,759	(147,201)	244,770	(38,181)
Valuation of loans due to hedging	577	9	79	(2)
Defined benefit obligation and insurance funds	(392)	(51)	(185)	(85)
Valuation of derivative financial instruments	(23,151)	(2,405)	1,367	(3,589)
Effective interest rate	582	986	216	175
Valuation of liabilities to credit institutions and other borrowed funds due to fair value hedge	420	(55)	(14)	400
Valuation / Impairment of debt securities and other securities	(65,920)	14,889	8,099	9,508
Tax losses carried forward	(312)	145,413	(501)	45,856
Other temporary differences	(1,631)	(276)	7,526	4,598
Total	(90,660)	38,074	20,967	11,699

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 / securitization 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, under specific terms and conditions.

Caption “Debit difference of Law 4465/2017” of the current period includes the deferred tax relating to the securitization of loan receivables and/or consumer, mortgage and corporate credits to special purpose entities in the context of the strategic plan 2020 - 2022, as referred in note 34. Respectively, an equal amount of deferred tax has been reversed in caption “Loans”, due to this transaction.

On 30.9.2020, the amount of deferred tax assets which falls within the scope of the Law 4465/2017 and also includes the debit difference of Law 4046/2012 (PSI), amounts to € 3,071 million (31.12.2019: € 3,166.7 million). Detailed information is provided in Note 13 of the Group’s Financial Statements of 31.12.2019.



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

	From 1 January to			
		30.9.2020		30.9.2019
	%		%	
Profit / (Loss) before income tax		141,177		139,702
Income tax (nominal tax rate)	33.29	46,991	29.81	41,649
Increase / (Decrease) due to:				
Non taxable income	(1.44)	(2,028)	(1.71)	(2,389)
Non deductible expenses	4.42	6,244	6.70	9,365
Other temporary differences	(28.76)	(40,607)	(0.32)	(452)
Income tax (effective tax rate)	7.51	10,600	34.48	48,173

“Other temporary differences” includes an amount of € 54,213 and relates to the reversal of the deferred tax which had been calculated on investments which are classified as “held for sale”, as a result of change in the tax regime by application of the article 20 of the Law 4646/2019, according to which the gains from the sale of the aforementioned investments is exempt from taxation, provided the sale takes place after 1.7.2020, while the losses are deductible up to the amount that have been recognized as of 31.12.2019.

	From 1 July to			
		30.9.2020		30.9.2019
	%		%	
Profit / (Loss) before income tax		76,421		20,616
Income tax (nominal tax rate)	25.50	19,487	43.83	9,037
Increase / (Decrease) due to:				
Non taxable income	(0.64)	(491)	(3.97)	(819)
Non deductible expenses	0.87	664	27.62	5,695
Other temporary differences	16.85	12,874	9.88	2,036
Income tax (effective tax rate)	42.58	32,534	77.36	15,949

Other temporary differences for the third quarter, includes mainly the reversal of the deferred tax asset which has been made in the previous fiscal years of a Group company.

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 the parent company and for each of the Group's subsidiaries.



Income tax of other comprehensive income

	From 1 January to					
	30.9.2020			30.9.2019		
	Before Income tax	Income tax	After Income tax	Before Income tax	Income tax	After Income tax
Amounts that may be reclassified to the Income Statement						
Net change in the reserve of debt securities measured at fair value through other comprehensive income	(215,508)	61,764	(153,744)	657,417	(189,221)	468,196
Net change in cash flow hedge reserve	15,603	(4,525)	11,078	(135,572)	39,316	(96,256)
Currency translation differences from financial statements and net investment hedging of foreign operations	(4,062)	(3,202)	(7,264)	(198)	(1,942)	(2,140)
	(203,967)	54,037	(149,930)	521,647	(151,847)	369,800
Amounts that will not be reclassified to the Income Statement						
Net change in actuarial gains / (losses) of defined benefit obligations	166	(207)	(41)			-
Gains / (Losses) from equity securities measured at fair value through other comprehensive income	3,801	(1,426)	2,375	(8,607)	3,018	(5,589)
	3,967	(1,633)	2,334	(8,607)	3,018	(5,589)
Total	200,000	52,404	(147,596)	513,040	(148,829)	364,211

	From 1 July to					
	30.9.2020			30.9.2019		
	Before Income tax	Income tax	After Income tax	Before Income tax	Income tax	After Income tax
Amounts that may be reclassified to the Income Statement						
Net change in the reserve of debt securities measured at fair value through other comprehensive income	13,498	(2,752)	10,746	239,813	(70,372)	169,441
Net change in cash flow hedge reserve	5,239	(1,520)	3,719	(52,184)	15,134	(37,050)
Currency translation differences from financial statements and net investment hedging of foreign operations	(799)	(750)	(1,549)	(34)	(173)	(207)
	17,938	(5,022)	12,916	187,595	(55,411)	132,184
Amounts that will not be reclassified to the Income Statement						
Net change in actuarial gains / (losses) of defined benefit obligations	168	(207)	(39)			-
Gains / (Losses) from equity securities measured at fair value through other comprehensive income	1,367	(440)	927	908	(234)	674
	1,535	(647)	888	908	(234)	674
Total	19,473	(5,669)	13,804	188,503	(55,645)	132,858



Receivables from withholding taxes

Further to the information provided in note 13 of Group Financial Statements as at 31.12.2019, 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 Economy 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 against any tax liability of the banks. The Bank's receivables from the Greek State subject to the above mentioned legislation amount to € 63,114. Following the ratification of that 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 law provisions. During the first nine month period of 2020, the Bank offsetted with current tax liabilities an amount of € 6,311, that corresponds to the 1/10 of the total above mentioned amount of € 63,114.

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. Within 2020, following the GEO 1/2020 decree, the tax was abolished for years 2020 onwards.

10. Earnings / (Losses) per share

a. Basic

Basic earnings / (losses) per share are calculated by dividing the net profit / (losses) for the year attributable to ordinary equity owners of the Bank, by the weighted average number of ordinary shares outstanding during the period, excluding own shares held, during the same period.

b. Diluted

Diluted earnings / (losses) per share are calculated by adjusting the weighted average number of ordinary shares outstanding during the period with the dilutive potential ordinary shares. The Bank does not have such shares, consequently the basic and dilutive earnings / (losses) per share do not differ.

	From 1 January to		From 1 July to	
	30.9.2020	30.9.2019	30.9.2020	30.9.2019
Profit / (Loss) attributable to equity holders of the Bank	130,447	91,633	43,831	4,806
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 €)	0.08	0.06	0.03	0.003



ASSETS

11. Cash and balances with Central Banks

	30.9.2020	31.12.2019
Cash	349,839	419,446
Cheques receivables	6,192	18,953
Balances with Central Banks	4,767,111	1,589,936
Total	5,123,142	2,028,335
Less: Mandatory reserves with Central Banks	(281,087)	(318,803)
Balance	4,842,055	1,709,532

The increase in Cash and balances with Central Banks is mainly due to the increase of funding by the Eurosystem.

Cash and cash equivalents (as presented in the Statement of Cash Flows)

	30.9.2020	31.12.2019
Cash and balances with central banks	4,842,055	1,709,532
Securities purchased under agreements to resell (Reverse Repos)	199,952	1,164,950
Short-term placements with other banks	375,471	527,846
Total	5,417,478	3,402,328

12. Due from banks

	30.9.2020	31.12.2019
Placements with other Banks	1,021,844	855,834
Deposits on Guarantees for coverage of derivative securities and repurchase agreements	1,582,114	1,345,304
Securities purchased under agreements to resell (Reverse Repos)	199,952	1,164,950
Loans to credit institutions	36,966	36,694
Less:		
Allowance for impairment losses (note 28a)	(70,108)	(70,092)
Total	2,770,768	3,332,690

The decrease in "Due from banks" is mainly attributed to the maturity of reverse repos agreements.

13. Loans and advances to customers

	30.9.2020	31.12.2019
Loans measured at amortized cost	47,258,554	46,880,841
Finance leases	607,643	589,173
Less: Allowance for impairment losses	(8,663,441)	(8,682,370)
Total	39,202,756	38,787,644
Receivables from customers measured at amortized cost	273,229	171,489
Loans measured at fair value through profit or loss	291,808	307,136
Receivables from customers measured at fair value through profit or loss	40,000	
Loans and advances to customers	39,807,793	39,266,269

As at 30.9.2020, the caption "Receivables from customers measured at amortized cost" includes allowance for impairment losses of € 44,772 (31.12.2019: € 41,011).



Receivables from customers measured at amortized cost as at 30.9.2020 includes receivables from the transfer of a Non- Performing loans portfolio, the sale of which was completed on 17.7.2020 as described in detail in note 31. More specifically, it includes a deferred consideration of € 90,036 that is expected to be received in cash within 3 years from the settlement of the transaction and a deferred consideration of € 40,300 to be paid no later than 24 months from the settlement of the transaction and is related to a Bank's claim for which an impairment of € 25,000 was recognized in the first semester.

Receivables from customers measured at fair value through profit or loss at 30.9.2020 refers to the contingent consideration which resulted from the above mentioned transaction, which fair value estimated as at 30.9.2020 to € 40,000.

Finance leases mainly derive from the activities of the Group's subsidiary Alpha Leasing A.E.

In the tables that follow, an analysis of loan portfolio per type and classification category is presented.

Loans measured at amortized cost

	30.9.2020	31.12.2019
Individuals		
Mortgages:		
- Non-securitized	12,794,565	17,319,572
- Securitized	4,157,195	
Consumer:		
- Non-securitized	2,012,657	3,510,938
- Securitized	2,112,550	645,948
Credit cards:		
- Non-securitized	449,605	721,165
- Securitized	761,518	576,367
Other	1,085	1,341
Total loans to individuals	22,289,175	22,775,331
Corporate:		
Corporate loans:		
- Non-securitized	18,571,929	21,164,093
- Securitized	6,001,780	2,416,455
Leasing:		
- Non-securitized	374,809	358,293
- Securitized	232,834	230,880
Factoring	395,670	524,962
Total corporate loans	25,577,022	24,694,683
Total	47,866,197	47,470,014
Less: Allowance for impairment losses	(8,663,441)	(8,682,370)
Total loans measured at amortised cost	39,202,756	38,787,644

On 30.4.2020, the Bank completed, in accordance with the provisions of article 10 of Law 3156/2003, the procedures for the securitization of consumer, mortgage and corporate loans through Special Purpose Vehicles of Law 3156/2003, based in Ireland. This transaction is part of the strategic plan of the Bank for the years 2020-2022 as analysed in note 34.

Specifically, the Bank transferred non performing loan portfolios to four Special Purpose Vehicles established for that reason, which in turn issued bonds. The Bank owns the total of the issuances and did not derecognise the loans, as it maintained in all cases the risks and rewards deriving from the securitized portfolios. As a consequence, the Group acquired the control over those Special Purpose Vehicles, which are included in the consolidated Financial Statements, as stated in note 24.

The balance of the securitized loans of the above transaction measured at amortized cost amounts to € 6,088,488 as of 30.9.2020. Additionally, in the previous fiscal years, the Bank has proceeded with the securitization of other consumer loans, corporate loans, mortgages and credit cards via Special Purpose Vehicles controlled by the Bank. From the assessment of the contractual terms as well as the structure of the transactions (e.g. providing guarantees and/or credit support or owning bonds issued by



Special Purpose Vehicles), it was concluded that the Bank has maintained in all cases the risks and rewards deriving from the securitized portfolios.

As at 30.9.2020 mortgage loans include loans amounting to € 4,561,233 (31.12.2019: € 4,651,208) 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.

In accordance with the Business Plan for the management of Non Performing Exposures, that the Bank submitted on October the 5th 2020 and has been prepared in accordance with the methodology and models of the supervisory authorities, the Group is obliged to monitor and report to the Single Supervisory Mechanism the level of the achievement of the targets set in the Business Plan on a consolidated basis until the end of 2022, through relevant supervisory reports. As at 30.9.2020, the balance of the NPE loans included in Total loans and advances to customers amounted to € 21.0 billion (31.12.2019: € 21.8 billion).

At 30.9.2020 Loans guaranteed by "Covid 19 Business Guarantee Fund" and loans with interest subsidy by "TEPIX II Business Financing" from Hellenic Development Bank amounted to € 946.084 and included in loans measured at amortized cost. Group for these loans has recognized provision for impairment losses amounted to € 8,064.

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

Allowance for impairment losses

Balance 1.1.2019	10,977,339
Changes for the period 1.1. - 30.9.2019	
Impairment losses for the period	680,721
Transfer of allowance for impairment losses to Assets held for sale	(1,141,118)
Derecognition due to substantial 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)
Balance 30.9.2019	8,880,457
Changes for the period 1.10 - 31.12.2019	
Impairment losses for the period	221,086
Transfer of allowance for impairment losses from Assets held for sale	48,924
Derecognition due to substantial modifications in loans' contractual terms	(3,850)
Change in present value of the impairment losses	15,263
Foreign exchange differences	(3,041)
Disposal of impaired loans	(17,059)
Loans written-off during the period	(456,196)
Other movements	(3,214)
Balance 31.12.2019	8,682,370
Changes for the period 1.1. - 30.9.2020	
Impairment losses for the period	695,540
Derecognition due to substantial modifications in loans' contractual terms	(2,935)
Change in present value of the impairment losses	63,698
Foreign exchange differences	(6,424)
Disposal of impaired loans	(76)
Loans written-off during the period	(769,735)
Other movements	1,003
Balance 30.9.2020	8,663,441

The impairment losses for the period, of the table above, do not include the impairment losses on loans classified as Assets Held for Sale and the movement of the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) which is included in the carrying amount of the loans.



The finance lease receivables are analyzed as follows, based on their duration:

	30.9.2020	31.12.2019
Up to 1 year	305,944	279,066
From 1 year to 5 years	166,806	251,398
Over 5 years	194,485	189,953
	667,235	720,417
Non accrued finance lease income	(59,592)	(131,244)
Total	607,643	589,173

The net amount of finance lease receivables is analyzed, based on their duration, as follows:

	30.9.2020	31.12.2019
Up to 1 year	293,937	266,807
From 1 year to 5 years	144,557	191,548
Over 5 years	169,149	130,819
Total	607,643	589,173

Loans measured at fair value through profit or loss

	30.9.2020	31.12.2019
Individuals		
Consumer:		
- Non-securitized	476	450
Total loans to individuals	476	450
Corporate:		
Corporate loans:		
- Non-securitized	183,113	290,725
- Securitized	108,219	15,961
Total corporate loans	291,332	306,686
Total loans to customers measured at fair value through profit or loss	291,808	307,136

As at 30.9.2020, securitized loans amounting to € 108,219 are part of the securitization of consumer, mortgage and corporate loans through Special Purpose Vehicles, as analyzed in note 34.

14. Trading and investment securities

i.Trading securities

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

	30.9.2020	31.12.2019
Bonds		
Greek Government	58,435	17,490
Other governments	4,253	
Other issuers		371
Equity securities		
Listed	464	890
Total	63,152	18,751

**ii. Investment securities**

	30.9.2020	31.12.2019
Securities measured at fair value through other comprehensive income	7,091,510	7,557,499
Securities measured at fair value through profit or loss	56,506	55,541
Securities measured at amortised cost	3,261,377	1,070,730
Total	10,409,393	8,683,770

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

	30.9.2020	31.12.2019
Greek Government:		
- Bonds	2,598,230	3,762,374
- Treasury bills	562,903	217,965
Other Governments:		
- Bonds	1,908,956	1,925,647
- Treasury bills	40,202	55,647
Other issuers:		
- Listed	1,888,153	1,487,635
- Non listed	8,449	17,896
Equity securities:		
- Listed	14,460	14,699
- Non Listed	70,157	75,636
Total	7,091,510	7,557,499

b. Securities measured at fair value through profit or loss

	30.9.2020	31.12.2019
Bonds from other Governments		9,025
Bonds from other issuers	11,943	13,556
Equity securities	5,627	2,626
Other variable yield securities	38,935	30,334
Total	56,505	55,541

Securities measured at fair value through profit or loss include securities for which it has been assessed that their contractual cash flows are not solely payments of principal and interest, as provided by IFRS 9.

c. Securities measured at amortized cost

	30.9.2020	31.12.2019
Greek Government:		
- Bonds	2,704,047	1,070,730
Other Governments:		
- Bonds	496,005	
Other issuers:		
- Listed	61,325	
Total	3,261,377	1,070,730

**15. Investment property**

	Land – Buildings	Rights-of-use on Land and Buildings	Total
Balance 1.1.2019			
Cost	639,497		639,497
Accumulated depreciation and impairment losses	(146,336)		(146,336)
1.1 - 30.9.2019			
Impact from the implementation of IFRS 16		10,319	10,319
Net book value 1.1.2019	493,161	10,319	503,480
Additions from acquisitions	37,195		37,195
Additions from companies consolidated for the first time in the period	10,172		10,172
Reclassification from / to "Property, Plant and Equipment"	(730)	446	(284)
Reclassification to "Assets held for sale"	(7,243)		(7,243)
Foreign Exchange differences	(1,286)		(1,286)
Disposals / Write-offs / Terminations	(23,702)		(23,702)
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
Balance 30.9.2019			
Cost	652,199	10,765	662,964
Accumulated depreciation and impairment losses	(151,444)	(1,152)	(152,596)
1.10 - 31.12.2019			
Net book value 1.10.2019	500,755	9,613	510,368
Additions from acquisitions	43,249		43,249
Additions from expenses capitalization	2,246		2,246
Additions from companies consolidated for the first time in the period	14,489		14,489
Reclassification to "Property, Plant and Equipment"	1	(1,458)	(1,457)
Reclassification to "Assets held for sale"	(55,578)		(55,578)
Foreign Exchange differences	582		582
Disposals / Write-offs / Terminations	(17,006)		(17,006)
Depreciation charge for the period	(2,957)	(214)	(3,171)
(Impairment losses) / Reversal of Impairment for the period	(9,390)	1,504	(7,886)
Net book value 31.12.2019	476,391	9,445	485,836
Balance 31.12.2019			
Cost	562,086	10,765	572,851
Accumulated depreciation and impairment losses	(85,695)	(1,320)	(87,015)
1.1 - 30.9.2020			
Net book value 1.1.2020	476,391	9,445	485,836
Additions from acquisitions	24,678		24,678
Additions from expenses capitalization	378		378
Additions from companies consolidated for the first time in the period	27,065		27,065
Reclassification from "Property, Plant and Equipment"	7,770		7,770
Reclassification to "Assets held for sale"	(14,774)		(14,774)
Foreign Exchange differences	(270)		(270)
Disposals / Write-offs / Terminations	(11,275)		(11,275)
Depreciation charge for the period	(6,292)	(625)	(6,917)
Impairment losses for the period	(77)	(403)	(480)
Net book value 30.9.2020	503,594	8,418	512,012
Balance 30.9.2020			
Cost	597,650	10,765	608,415
Accumulated depreciation and impairment losses	(94,056)	(2,347)	(96,403)



During the first nine month period of 2020 the Group transferred an amount of € 7,770 from “Property, plant and equipment” to “Investment property”, which mainly related to properties leased to third parties.

The “additions from acquisitions” for the current period as well as the “additions from companies consolidated for the first time in the period” mainly relate to investment properties, previously received as collaterals on loans, which were acquired by the Group in the context of its credit risk management.

During the first nine month period of 2020 the Group transferred an amount of € 14,774 from “Investment Property” to “Assets held for sale”, as stated in detail in Note 31.

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

The Group’s policy to evaluate real estate on an annual basis. Due to the emergency situation created by the spread of the pandemic and the impact on the economy in general, the competent divisions of the Bank were asked to carry out an emergency valuation of real estate with a reference date of 30.9.2020.

According to the updated report from the competent divisions of the Bank in regards to Covid-19 effect on properties’ values in Greece and the other countries where the Group has a presence (residential properties and offices) and on the basis of the basic scenario’s assumptions regarding the development of the pandemic and its effects on the prices of the aforementioned properties, as well as the data from the Group’s recent disposals to third parties, it is estimated that such prices remain as at 30.9.2020 at the levels of the last quarter of 2019.

Although there is uncertainty in the economy due to the spread of the pandemic, it is assessed that there is no reason for impairment of the properties as at 30.9.2020, a fact that will be reconsidered on 31.12.2020.

It is noted that the caption “Impairment losses for the period” with a total amount of € 480 includes an amount of € 403 which relates to impairments of rights-of-use on building for which the lease has been terminated.

As at 31.12.2019, an impairment loss / (profit) from reversal of impairment amounting to € 8,645 was recognized, in order the carrying amount of investment properties to not exceed their recoverable amount as at 31.12.2019, estimated by certified appraisals. The impairment amount was included in “Other Expenses” of the Income Statement.

The Group as a lessor of own property to third parties recognizes in the results of the period revenue from leases.

The future operating lease revenues are as follows:

	30.9.2020	31.12.2019
Up to 1 year	6,855	8,463
From 1 year to 5 years	16,616	24,038
Over 5 years	2,050	14,601
Total	25,521	47,102

The future lease revenues are described in note 13. The Group as a lessee had no material impact from the Covid-19 measures related to leases amounted to € 687.

**16. Property, plant and equipment**

	Land and Buildings	Leasehold improvements	Equipment	Rights-of-use on fixed assets	Total
Balance 1.1.2019					
Cost	896,655	3,237	471,635		1,371,527
Accumulated depreciation and impairment losses	(247,749)	(2,886)	(386,229)		(636,864)
1.1.2019 - 30.9.2019					
Impact from the implementation of IFRS 16		(351)		157,871	157,520
Net book value 1.1.2019	648,906		85,406	157,871	892,183
Additions	7,544		24,512	17,154	49,210
Reassessment / Disposals / Write-offs / Terminations	(810)		(72)	(2,915)	(3,797)
Reclassification from / to "Investment Property"	730			(446)	284
Reclassification to "Other Assets"	(1,386)				(1,386)
Reclassification to "Assets held for sale"			(94)	(3,973)	(4,067)
Reclassification internally to "Property, Plant and Equipment"			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	641,240	-	95,050	141,966	878,256
Balance 30.9.2019					
Cost	914,120		495,952	171,528	1,581,600
Accumulated depreciation and impairment losses	(272,880)		(400,902)	(29,562)	(703,344)
1.10.2019- 31.12.2019					
Net book value 1.10.2019	641,240		95,050	141,966	878,256
Additions	3,026		7,383	2,940	13,349
Reassessment / Disposals / Write-offs / Terminations	(841)		(25)	(6,763)	(7,629)
Reclassification from / to "Investment Property"	(1)			1,458	1,457
Reclassification to "Other Assets"	(1,671)				(1,671)
Reclassification to "Assets held for sale"	(9,920)		5	3,973	(5,942)
Reclassification internally to "Property, Plant and Equipment"			(2)	2	-
Foreign Exchange differences	(184)		80	(2,628)	(2,732)
Depreciation charge for the period	(4,646)		(5,335)	(8,307)	(18,288)
Impairment losses for the period	(1,164)			(3,304)	(4,468)
Net book value 31.12.2019	625,839	-	97,156	129,337	852,332
Balance 31.12.2019					
Cost	894,307		502,586	168,654	1,565,547
Accumulated depreciation and impairment losses	(268,468)		(405,430)	(39,317)	(713,215)
1.1 - 30.9.2020					
Net book value 1.1.2020	625,839		97,156	129,337	852,332
Additions	5,177		18,880	11,516	35,573
Reassessment / Disposals / Write-offs / Terminations	(510)		(712)	1,203	(19)
Reclassification to "Investment Property"	(7,770)				(7,770)
Reclassification internally to "Property, Plant and Equipment"	(20)		20		-
Reclassification to "Other Assets"	(837)				(837)
Foreign Exchange differences	1,596		159	(1,992)	(237)
Depreciation charge for the period	(12,835)		(17,024)	(23,848)	(53,707)
Net book value 30.9.2020	610,640	-	98,479	116,216	825,335
Balance 30.9.2020					
Cost	883,554		518,418	183,912	1,585,884
Accumulated depreciation and impairment losses	(272,914)		(419,939)	(67,696)	(760,549)

Following the implementation of the new accounting standard, IFRS 16, effective from 1.1.2019, the Group recognized Rights-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 IFRS 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 "Rights-of-use on fixed assets" at the amount of € 157,871.



It is noted that although there is uncertainty in the economy due to the Covid-19 pandemic, there is no reason of impairment of the properties' value as of 30.9.2020, a fact that will be re-assessed as of 31.12.2020, as is described in detail on Note 15.

Additionally, there was no impact to the Bank deriving from the implementation of measures regarding leases concession, given that the Bank, as a lessee, has not been favored in this regard.

In 2019, an impairment loss on property of € 5,111 was recognized in "Other Expenses".

17. Goodwill and other intangible assets

	Goodwill	Software	Other intangible	Total
Balance 1.1.2019				
Cost		787,082	141,487	928,569
Accumulated depreciation and impairment losses		(396,915)	(97,561)	(494,476)
1.1 - 30.9.2019				
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)
Depreciation charge for the period		(35,445)	(11,797)	(47,242)
Net book value 30.9.2019		445,272	32,129	477,401
Balance 30.9.2019				
Cost		877,288	141,485	1,018,773
Accumulated depreciation and impairment losses		(432,016)	(109,356)	(541,372)
1.10 - 31.12.2019				
Net book value 1.10.2019		445,272	32,129	477,401
Additions		30,801		30,801
Disposals / Write-offs				-
Foreign exchange differences		(30)		(30)
Depreciation charge for the period		(13,173)	(2,653)	(15,826)
Net book value 31.12.2019		462,870	29,476	492,346
Balance 31.12.2019				
Cost		908,034	141,484	1,049,518
Accumulated depreciation and impairment losses		(445,164)	(112,008)	(557,172)
1.1 - 30.9.2020				
Net book value 1.1.2020		462,870	29,476	492,346
Additions	55,332	87,528		142,860
Disposals / Write-offs		(304)		(304)
Foreign exchange differences		197		197
Depreciation charge for the period		(46,553)	(7,955)	(54,508)
Net book value 30.9.2020	55,332	503,738	21,521	580,591
Balance 30.9.2020				
Cost	55,332	994,680	141,484	1,191,496
Accumulated depreciation and impairment losses		(490,942)	(119,963)	(610,905)

The additions of software in the current period mainly concern implementations of applications and purchases of software licenses for computer applications used by the Bank. Accordingly, the additions of Goodwill arise from the first consolidation of Cepal Holdings S.A., which is mainly attributed to customer relations and service loan agreements (SLAs), as the Group acquired control of the company by acquiring 100% of its share capital on 22.7.2020 (note 24).

"Other" mainly includes amounts relating to intangible assets recognized for the acquired customer relationships of Diners credit cards in 2015 with 7 years of useful life and the acquired customer relationships and deposit base of Citibank in 2014 with 9 and 7 years useful life respectively.



LIABILITIES

18. Due to banks

	30.9.2020	31.12.2019
Deposits:		
- Current accounts	124,703	84,461
- Term deposits:		
Central Banks	11,883,638	3,064,446
Other credit institutions	92,650	245,775
Cash collateral for derivative margin accounts and repurchase agreements	7,671	17,058
Sale and repurchase agreements (Repos)	561,544	6,278,454
Borrowing funds	568,093	567,942
Deposits on demand:		
- Other credit institutions	3,651	3,147
Total	13,241,950	10,261,283

In order to cope with the effects of Covid-19 pandemic, ensure adequate liquidity, normalize market's condition and support the credit expansion, European Central Bank gradually announced since March 2020 a series of measures such as amendment on terms of the Targeted Longer Term Refinancing Operations III and a new bunch of non-targeted longer term refinancing operations due to the pandemic (Pandemic Emergency Longer Term Refinancing Operations). On 24.06.2020 the Bank proceeded to the early termination of the borrowed amount of € 3,1 billion, through the existing program of targeted long term refinancing II (TLTRO II) with an interest rate of -0,40% and raised additional liquidity of € 11.9 billion through the Targeted Long Term Refinancing Operations III (TLTRO III) with an interest rate -0,50% while at the same date matured an amount of € 7.5 billion that the Bank raised during the nine month period of 2020 through the Long-Term Refinancing Operations (LTRO). It is noted that the interest rate of TLTRO III can reach -1% for the period from June 2020 to June 2021 and remain to -0.5% for the residual period until maturity, provided that the amount of loans falling under the program remain for the period between March 2020 and March 2021, at March 2020's levels. The aforementioned increase was combined with a decrease of sale and repurchase agreements (Repos). The caption "Borrowing funds" mainly includes Group's liabilities to multilateral development Banks.

19. Debt securities in issue and other borrowed funds

i. Covered bonds

The movement of covered bonds issuances is summarized on the table below:

Balance 1.1.2020	711,647
Change for the period 1.1 – 30.9.2020	
Repurchases	(943)
Maturities / Repayments	(13,683)
Financial (gains) / losses	(68)
Accrued interest	11,223
Balance 30.9.2020	708,176

**a. Held by the Group**

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+0.50%	23.1.2021	1,000,000	1,000,000
Alpha Bank S.A.	Euro	3m Euribor+0.50%	23.1.2021	1,000,000	1,000,000
Alpha Bank S.A.	Euro	3m Euribor+0.35%	23.1.2021	200,000	200,000
Alpha Bank S.A.	Euro	2.50%	5.2.2023	1,000	
Total				2,201,000	2,200,000

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Bank S.A.	Euro	2.50%	5.2.2023	499,000	500,000
Alpha Bank Romania S.A.	Euro	6m Euribor+1.5%	16.5.2024	200,000	200,000
Total				699,000	700,000

ii. Secured Note Program

The following table presents additional information for Secured Note Program issuances:

Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+1.8%	25.10.2020	800,000	800,000
Total				800,000	800,000

iii. Senior debt securities

Balance 1.1.2020	1,369
Change for the period 1.1 – 30.9.2020	
Maturities / Repayments	(43)
Accrued interest	187
Balance 30.9.2020	1,513

The following table presents additional information for senior debt securities:

Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Bank S.A.	Euro	2.50%	20.6.2022	350	350
Alpha Bank S.A.	Euro	2.50%	20.6.2022	1,345	1,345
Total				1,695	1,695

**iv. Liabilities from the securitization of shipping loans**

Balance 1.1.2020	154,936
Change for the period 1.1 – 30.9.2020	
Acquisitions	(55,058)
Maturities / Repayments	(110,076)
Accrued interest	2,493
Foreign exchange differences	7,705
Balance 30.9.2020	-

The Bank has proceeded to the securitization of shipping loans, transferring the respective shipping loans to the fully consolidated Special Purpose Vehicle, Alpha Shipping Finance Ltd., which in turn obtained third party financing. On 21.9.2020, the Bank purchased the entire liability to third parties and from this date is the only lender of the Special Purpose Vehicle, Alpha Shipping Finance Ltd.

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

a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Shipping Finance Ltd	USD	1m USD Libor+2.25%	20.9.2022	15,726	
Alpha Shipping Finance Ltd	USD	3m USD Libor+2.25%	20.9.2022	31,130	
Total				46,856	-

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Shipping Finance Ltd	USD	1m USD Libor+2.25%	20.9.2022		10,372
Alpha Shipping Finance Ltd	USD	3m USD Libor+2.25%	20.9.2022		144,059
Total				-	154,431

v. Debt securities from the securitization of consumer loans

The Bank has securitized consumer loans, by transferring these loans to the fully consolidated special purpose vehicle, Katanalotika Plc. On 18.12.2019 part of these bonds, amounting to € 220,000, were transferred to third parties for financing. The Group's liability to third parties amounts to € 220 million as at 30.9.2020.

Balance 1.1.2020	220,090
Change for the period 1.1 – 30.9.2020	
Repayments	(1,082)
Accrued interest	1,066
Balance 30.9.2020	220,074



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

Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Katanalotika Plc LDN - CLASS A	Euro	3m Euribor +1.35%, minimum 0%	17.12.2029	220,000	220,000
Total				220,000	220,000

On 18.12.2019 the interest rate spread on Katanalotika Plc-Class A was amended as follows: 1.45% for the payment date March 2020, 1.35% from Payment Date June 2020 to December 2020 and 2.60% for the remaining Payment Dates.

vi. Liabilities from the securitization of loans and receivables

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 vehicle 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. After repayments of € 7,064 and € 7,065 on 15.7.2019 and 15.1.2020 respectively the nominal value of the bond amounts to € 292,735.

Liabilities derived from the securitization of consumer loans, corporate loans and credit cards are not included in the caption “Debt securities in issue and other borrowed funds”, because the respective titles of nominal value € 2,533,735 (31.12.2019: 3,634,200) that were issued by special purpose vehicles are held by the bank.

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

Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Katanalotika Plc LDN - CLASS Z	Euro	3m Euribor +1%, minimum 0%	17.12.2029	360,000	360,000
Epihiro Plc LDN - CLASS A	Euro	6m Euribor +0.3%, minimum 0%	20.1.2035	400,000	785,600
Epihiro Plc LDN - CLASS B	Euro	6m Euribor, minimum 0%	20.1.2035	100,000	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	292,735	299,800
Alpha Proodos DAC - Class B	Euro	3m Euribor+1.3%, minimum 0%	23.7.2041	100,000	100,000
Alpha Proodos DAC - Class C	Euro	3m Euribor+1.8%, minimum 0%	23.7.2041	220,000	220,000
Total				2,533,735	3,634,200

vii. Liabilities from the securitization of non performing loans

On 30.4.2020, the Bank has proceeded to a securitization transaction of non performing retail and corporate loans, whose terms have been finalized on 24.6.2020. More specifically, non performing loans with a book value of € 6,196,707 as at 30.9.2020 (note 13), were transferred to the Special Purpose Vehicles Orion X Securitisation Designated Activity Company, Galaxy II Funding Designated Activity Company, Galaxy III Funding Designated Activity Company and Galaxy IV Funding Designated Activity Company, incorporated in Ireland.

The liabilities that arose from the aforementioned securitization, are not included in the caption “Debt securities in issue and other borrowed funds”, due to the fact that the respective securities of a total nominal value € 11,722,272, issued by the Special Purpose Vehicles, have been purchased by the Bank at an amount equal to the book value of the loans that were securitized.



Information regarding the aforementioned issuances is presented in the below table:

Held by the Group

Issuer	Rating	Currency	Interest Rate	Maturity	Nominal value
Orion X SECUR. DAC DUB	High	Euro	0.75%	15.10.2060	879,000
Orion X SECUR. DAC DUB	Medium	Euro	4%	15.10.2060	104,000
Orion X SECUR. DAC DUB	Low	Euro	Available amounts after higher priority payment coverage	15.10.2060	940,688
Galaxy II FUND DESI ACTI DUB	High	Euro	0.75%	15.10.2060	2,053,000
Galaxy II FUND DESI ACTI DUB	Medium	Euro	4%	15.10.2060	364,000
Galaxy II FUND DESI ACTI DUB	Low	Euro	Available amounts after higher priority payment coverage	15.10.2060	3,329,849
Galaxy III FUND DESI ACT DUB	Single discount priority	Euro	Available amounts	15.10.2060	946,538
Galaxy IV FUNDING DAC DUB	High	Euro	0.75%	15.10.2060	670,000
Galaxy IV FUNDING DAC DUB	Medium	Euro	4%	15.10.2060	263,000
Galaxy IV FUNDING DAC DUB	Low	Euro	Available amounts after higher priority payment coverage	15.10.2060	2,172,197
Total					11,722,272

viii. Subordinated debt (Lower Tier II, Upper Tier II)

In the context of the Euro Medium Term Note Program of € 15 billion, the Bank issued on 13.2.2020 a subordinated debt at a nominal value of € 500 million for a period of ten years, with the option to recall in five years and with a fixed annual interest rate of 4.25%.

Balance 1.1.2020	651
Change for the period 1.1 – 30.9.2020	
New issues	495,863
Repurchases	(7,212)
Maturities / Repayments	(6)
Hedging adjustments	3,858
Financial (gains) / losses	(950)
Accrued interest	13,438
Balance 30.9.2020	505,642

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

a. Held by the Group

Issuer	Currency	Interest Rate	Maturity	Nominal value	
				30.9.2020	31.12.2019
Alpha Bank S.A.	Euro	4.25%	13.2.2030	8,200	
Total				8,200	-

b. Held by third parties

Issuer	Currency	Interest Rate	Maturity	Nominal Value	
				30.9.2020	31.12.2019
Alpha Bank S.A.	Euro	3m Euribor+1.5%	Indefinite	650	650
Alpha Bank S.A.	Euro	4.25%	13.2.2030	491,800	
Total				492,450	650

Total of debt securities in issue and other borrowed funds as at 30.9.2020	1,435,405
---	------------------



20. Provisions

	30.9.2020	31.12.2019
Insurance provisions	475,757	405,412
Provisions to cover credit risk and other provisions	185,747	194,129
Total	661,504	599,541

a. Insurance provisions

	30.9.2020	31.12.2019
Life insurance		
Mathematical reserves	471,878	404,960
Outstanding claim reserves	3,879	452
Total	475,757	405,412

b. Provisions to cover credit risk and other provisions

Balance 1.1.2019	213,701
Changes for the period 1.1 - 30.9.2019	
Provisions to cover credit risk relating to letters of guarantee, letters of credit and undrawn revolving loan commitments (note 7)	11,707
Other provisions	24,242
Other provisions used during the period	(5,171)
Provision for voluntary separation scheme	42,312
Reversal of voluntary separation scheme provision	(49,845)
Foreign exchange differences	119
Balance 30.9.2019	237,065
Changes for the period 1.10 - 31.12.2019	
Provisions / (Reversal of provisions) to cover credit risk relating to letters of guarantee, letters of credit and undrawn revolving loan commitments	(10,456)
Other provisions	(3,803)
Other provisions used during the period	(2,939)
Provision for voluntary separation scheme	50,219
Reclassification from employee's indemnity provision in accordance with Law 2112/1920 in voluntary exit scheme provision which is related to those who have left using the long-term paid leave	1,098
Used provision for voluntary separation scheme	(75,729)
Reversal of voluntary separation scheme provision	(604)
Foreign exchange differences	(722)
Balance 31.12.2019	194,129
Changes for the period 1.1 - 30.9.2020	
Provisions / (Reversal of provisions) to cover credit risk relating to letters of guarantee, letters of credit and undrawn revolving loan commitments (note 7)	4,294
Other provisions	3,134
Other provisions used during the period	(3,798)
Used provision for voluntary separation scheme	(10,698)
Foreign exchange differences	(1,314)
Balance 30.9.2020	185,747

The amounts of the provisions to cover credit risk for letters of guarantee, letters of credits and undrawn loan commitments are included in "Impairment losses and provisions to cover credit risk" of Income Statement (note 7) and the amounts of other provisions are included in the line of "Other expenses" of Income Statement.

On 30.9.2020 the balance of provisions to cover credit risk relating to letters of guarantee, letters of credit and undrawn loan commitments amounts to € 96,589 (31.12.2019: € 93,440) of which an amount of € 7,256 (31.12.2019: € 5,695) relates



to provisions for undrawn loan commitments and an amount of € 89,333 (31.12.2019: € 87,745) relates to provisions for Letters of Guarantee and Letters of Credit.

On 30.9.2020 the balance of the provisions for voluntary separation schemes amounts to € 15,757 (31.12.2019: € 26,456), which concerns by € 14,432 (31.12.2019: € 24,419) the coverage of the costs for the employees, who left making use of the long-term leave, within the framework of the several staff departure programs that took place from 2016 onwards and by € 1,325 (31.12.2019: € 2,037) the senior executives' compensation scheme.

On 30.9.2020 the balance of other provisions amounted to € 73,401 (31.12.2019: € 74,234) out of which:

- An amount of € 26,951 (31.12.2019: € 26,199) relates to pending legal cases,
- An amount of € 15,635 (31.12.2019: € 17,522) relates to the Bank's estimate for the period ended 30.9.2020, of non-successful appeals which were filed in previous years regarding the payment of contributions to an insurance fund, while,
- The remaining balance of other provisions mainly relates to provisions covering operational risk events.



EQUITY

21. Share capital and Retained earnings

a. Share capital

On 30.9.2020 and 31.12.2019, the Bank's share capital amounts to € 463,110 divided into 1,543,699,381 ordinary, registered, voting shares of the Bank with a nominal value of € 0.30 each.

The General Meeting held on 31.7.2020 approved the establishment and implementation of a five-year Stock Options Plan in the form of stock options rights by issuing new shares, in accordance with article 113 of Law 4548/2018, to Members of the Management and of the Personnel of the Bank and its affiliated companies, within the meaning of article 32 of Law 4308/2014, in accordance with the terms below.

In addition, the General Meeting approved the assignment to the Board of Directors of the task to determine the beneficiaries, the terms of options' awarding as well as the remaining terms and conditions of the Plan, in accordance with the applicable regulatory and legal framework and the Bank's policies.

According to the terms of the Plan approved by the General Meeting:

- i. in order to satisfy the option rights that will be exercised, the Bank will proceed with a corresponding share capital increase and with the issuance of new shares,
- ii. the maximum number of rights that can be approved will be 23,155,490 rights, each of which will correspond to one New Share, a number corresponding to 1.5% of the current paid-in share capital,
- iii. the beneficiaries are Members of the Management and of the Personnel of the Bank and its affiliated companies, within the meaning of article 32 of Law 4308/2014,
- iv. the offer price of each New Share is equal to the nominal value of the share, i.e. € 0.30.

The regulation with the terms on the awarding of stock options rights to members of the management and of the personnel of the Bank and its affiliated companies is under the Bank's Board of Directors approval.

b. Retained earnings

Since there were no distributable profits for the fiscal year 2019, in accordance with the provisions of article 159 of Codified Law 4548/2018, the Bank's Ordinary General Meeting of Shareholders held on 31.7.2020, decided the non distribution of dividend to the ordinary shareholders of the Bank.

22. Hybrid securities

	30.9.2020	31.12.2019
Perpetual with 1st call option on 18.2.2015 and per year	15,232	15,232
Securities held by Group companies	(448)	(160)
Total	14,784	15,072



ADDITIONAL INFORMATION

23. Contingent liabilities and commitments

a. Legal issues

In the ordinary course of business for the Group, there are certain legal claims against the Group. In the context of managing the operational risk and based on the applied accounting policies, the Group has established internal controls and processes to monitor all legal claims and similar actions by third parties in order to assess the probability of a negative outcome and the potential loss.

For cases where there is a significant probability of a negative outcome, and the result may be reliably estimated, the Group recognizes a provision that is included in the Balance Sheet under the caption "Provisions". On 30.9.2020 the amount of these provisions stood at € 26,951 (31.12.2019: € 26,199).

For cases that according to their progress and the assessment of the Legal department as at September 30, 2020, a negative outcome is not probable or the potential outflow cannot be estimated reliably due to the complexity of the cases and their duration, the Group has not recognized a provision. As of 30.9.2020 the legal claims against the Group for the above cases amount to € 301,841 (31.12.2019: € 338,920).

According to the Legal department's estimation, the ultimate settlement of the claims and lawsuits is not expected to have a material effect on the financial position or the operations 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, 2012 and 2013 are considered prescribed as per the circular POL 1208/20.12.2017 of the Independent Public Revenue Authority. On 13.7.2020 was issued an order for tax audit of the year 2014. For the years 2011 up to 2018, the Bank has obtained a tax certificate with no qualifications according to the provisions of article 82 of Law 2238/1994 and the article 65A of Law 4174/2013. The tax audit for tax certificate of year 2019 is in progress.

Former Emporiki Bank has been audited by the tax authorities for the years up to and including 2008. Years 2009-2013 are considered prescribed, in accordance with the Circular POL 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 year 2016. The Bank's branch in Luxembourg initiated its operation in June 2020.

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, 2012 and 2013 are considered prescribed, in accordance with the Circular POL 1208/20.12.2017 of the Independent Public Revenue Authority. For the tax years 2011 up to and including 2013 Diners Club of Greece A.E.P.P. has obtained a tax certificate with no qualifications.

According to Circular POL 1006/5.1.2016 there is no exemption from tax audit by the tax authorities to those entities that have been tax audited by the independent auditor and they have received an unqualified tax audit certificate. Therefore, the tax authorities may reaudit the tax books for previous years.

Additional taxes, interest on late submission and penalties may be imposed by tax authorities, as a result of tax audits for unaudited tax years, the amount of which cannot be accurately 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
Banks	
1. Alpha Bank London Ltd (voluntary settlement of tax obligation)	2017
2. Alpha Bank Cyprus Ltd	2017
3. Alpha Bank Romania S.A. (tax audit is in progress for the years 2014 - 2019)	2006
4. Alpha Bank Albania SH.A. (tax audit is in progress for the year 2019)	2012
Leasing Companies	
1. Alpha Leasing A.E.**	2013
2. Alpha Leasing Romania IFN S.A.	2014
3. ABC Factors A.E.**	2013
4. Cepal Holdings A.E.	*
Investment Banking	
1. Alpha Finance A.E.P.E.Y. ** / ***	2013
2. SSIF Alpha Finance Romania S.A.	2002
3. Alpha Ventures A.E. ** / ***	2013
4. Alpha A.E. Ventures Capital Management - AKES ** / ***	2013
5. Emporiki Ventures Capital Developed Markets Ltd	2007
6. Emporiki Ventures Capital Emerging Markets Ltd	2008
Asset Management	
1. Alpha Asset Management A.E.D.A.K. ** / ***	2013
2. ABL Independent Financial Advisers Ltd (voluntary settlement of tax obligation)	2017
Insurance	
1. Alpha Insurance Agents A.E. ** / ***	2013
2. Alpha Insurance Brokers Srl	2006
3. Alphalife A.A.E.Z.** / *** (within Q1 2020 completed the audit for fiscal years 2015-2016)	2013
Real estate and Hotel	
1. Alpha Astika Akinita A.E. **	2013
2. Alpha Holdings S.M.S.A. (former Emporiki Development and Real Estate Management A.E.)	2013
3. Alpha Real Estate Management and Investments S.A. (former Ionian Holdings)	2013
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)**	2013
8. Alpha Investment Property Attikis II A.E. (commencement of operation 2012)**	2013
9. AGI-RRE Participations 1 Srl (commencement of operation 2010)	*
10. Stockfort Ltd (commencement of operation 2010)	*
11. Romfelt Real Estate S.A.	2015
12. AGI-RRE Zeus Srl (commencement of operation 2012)	*
13. AGI-RRE Poseidon Srl (commencement of operation 2012)	*
14. AGI-RRE Hera Srl (commencement of operation 2012)	*
15. Alpha Real Estate Services LLC (commencement of operation 2010)	*
16. AGI-BRE Participations 2 E.O.O.D. (commencement of operation 2012)	*
17. AGI-BRE Participations 2BG E.O.O.D. (commencement of operation 2012)	*
18. AGI-BRE Participations 3 E.O.O.D.(commencement of operation 2012- the company was transferred on 30.6.2020)	*
19. AGI-BRE Participations 4 E.O.O.D. (commencement of operation 2012)	*
20. APE Fixed Assets A.E. ** / ***	2013
21. SC Cordia Residence Srl (the company liquidated on 11.6.2020)	2013
22. AGI-RRE Cleopatra Srl (commencement of operation 2014)	*

* 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 2018 without any qualification whereas the years up to and including 2013 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
23. SC Carmel Residential Srl (commencement of operation 2013)	*
24. Alpha Investment Property Neas Kifissias A.E. (commencement of operation 2014)	*
25. Alpha Investment Property Kallirois A.E. (commencement of operation 2014)	*
26. AGI-Cypré Alaminos Ltd (commencement of operation 2014 – the company was transferred on 7.1.2020)	*
27. AGI-Cypré Tochni Ltd (commencement of operation 2014)	*
28. AGI-Cypré Mazotos Ltd (commencement of operation 2014)	*
29. Alpha Investment Property Livadias A.E. (commencement of operation 2014)	*
30. Asmita Gardens Srl	2015
31. Alpha Investment Property Kefalariou A.E. (commencement of operation 2015)	*
32. Cubic Center Development S.A. (commencement of operation 2010)	2015
33. Alpha Investment Property Neas Erythreas A.E. (commencement of operation 2015)	*
34. AGI-SRE Participations 1 D.O.O. (commencement of operation 2016)	*
35. Alpha Investment Property Spaton A.E (commencement of operation 2017)	*
36. TH Top Hotels Srl (commencement of operation 2009)	*
37. Alpha Investment Property Kallitheas A.E. (commencement of operation 2017)	*
38. Kestrel Enterprise E.O.O.D. (commencement of operation 2013)	*****
39. Beroe Real Estate E.O.O.D. (commencement of operation 2018)	*
40. Alpha Investment Property Irakleiou A.E. (commencement of operation 2018)	*
41. Alpha Investment Property GI I A.E. (commencement of operation 2018)	*
42. AGI-Cypré Property 2 Ltd (commencement of operation 2018)	*
43. AGI-Cypré Property 3 Ltd (commencement of operation 2018)	*
44. AGI-Cypré Property 4 Ltd (commencement of operation 2018)	*
45. AGI-Cypré Property 5 Ltd (commencement of operation 2018)	*
46. AGI-Cypré Property 6 Ltd (commencement of operation 2018)	*
47. AGI-Cypré Property 7 Ltd (commencement of operation 2018)	*
48. AGI-Cypré Property 8 Ltd (commencement of operation 2018)	*
49. ABC RE L1 Ltd (commencement of operation 2018 - the company was transferred on 5.8.2020)	*
50. AGI-Cypré Property 9 Ltd (commencement of operation 2018)	*
51. AGI-Cypré Property 10 Ltd (commencement of operation 2018)	*
52. AGI-Cypré Property 11 Ltd (commencement of operation 2018)	*
53. AGI-Cypré Property 12 Ltd (commencement of operation 2018)	*
54. AGI-Cypré Property 13 Ltd (commencement of operation 2018)	*
55. AGI-Cypré Property 14 Ltd (commencement of operation 2018)	*
56. AGI-Cypré Property 15 Ltd (commencement of operation 2018)	*
57. AGI-Cypré Property 16 Ltd (commencement of operation 2018)	*
58. AGI-Cypré Property 17 Ltd (commencement of operation 2018)	*
59. AGI-Cypré Property 18 Ltd (commencement of operation 2018)	*
60. AGI-Cypré Property 19 Ltd (commencement of operation 2018)	*
61. AGI-Cypré Property 20 Ltd (commencement of operation 2018)	*
62. AGI-Cypré RES Pafos Ltd (commencement of operation 2018)	*
63. AGI-Cypré P&F Nicosia Ltd (commencement of operation 2018)	*
64. ABC RE P1 Ltd (commencement of operation 2018)	*
65. ABC RE P2 Ltd (commencement of operation 2018)	*
66. ABC RE P3 Ltd (commencement of operation 2018)	*
67. ABC RE L2 Ltd (commencement of operation 2018)	*
68. ABC RE P4 Ltd (commencement of operation 2018)	*
69. AGI-Cypré RES Nicosia Ltd (commencement of operation 2018)	*
70. AGI-Cypré P&F Limassol Ltd (commencement of operation 2018)	*
71. AGI-Cypré Property 21 Ltd (commencement of operation 2018)	*
72. AGI-Cypré Property 22 Ltd (commencement of operation 2018)	*
73. AGI-Cypré Property 23 Ltd (commencement of operation 2018)	*
74. AGI-Cypré Property 24 Ltd (commencement of operation 2018)	*

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

***** These companies entered the Group in 2017 through bankruptcy and have not been audited by the tax authorities since then.



Name	Year
75. ABC RE L3 Ltd (commencement of operation 2018)	*
76. ABC RE P&F Limassol Ltd (commencement of operation 2018)	*
77. AGI-Cypr Property 25 Ltd (commencement of operation 2019)	*
78. AGI-Cypr Property 26 Ltd (commencement of operation 2019)	*
79. ABC RE COM Pafos Ltd (commencement of operation 2019)	*
80. ABC RE RES Larnaca Ltd (commencement of operation 2019)	*
81. AGI-Cypr P&F Pafos Ltd (commencement of operation 2019)	*
82. AGI-Cypr Property 27 Ltd (commencement of operation 2019)	*
83. ABC RE L4 Ltd (commencement of operation 2019)	*
84. ABC RE L5 Ltd (commencement of operation 2019)	*
85. AGI-Cypr Property 28 Ltd (commencement of operation 2019)	*
86. AGI-Cypr Property 29 Ltd (commencement of operation 2019)	*
87. AGI-Cypr Property 30 Ltd (commencement of operation 2019)	*
88. AGI-Cypr COM Pafos Ltd (commencement of operation 2019)	*
89. AIP Industrial Assets S.M.S.A. (commencement of operation 2019)	*
90. AGI-Cypr Property 31 Ltd (commencement of operation 2019)	*
91. AGI-Cypr Property 32 Ltd (commencement of operation 2019)	*
92. AGI-Cypr Property 33 Ltd (commencement of operation 2019)	*
93. AGI-Cypr Property 34 Ltd (commencement of operation 2019)	*
94. Alpha Group Real Estate Ltd (commencement of operation 2019)	*
95. ABC RE P&F Pafos Ltd (commencement of operation 2019)	*
96. ABC RE P&F Nicosia Ltd (commencement of operation 2019)	*
97. ABC RE RES Nicosia Ltd (commencement of operation 2019)	*
98. Fierton Ltd (commencement of operation 2019)	*
99. AIP Residential Assets Rog S.M.S.A. (commencement of operation 2019)	*
100. AIP Attica Residential Assets I S.M.S.A. (commencement of operation 2019)	*
101. AIP Thessaloniki Residential Assets S.M.S.A. (commencement of operation 2019)	*
102. AIP Cretan Residential Assets S.M.S.A. (commencement of operation 2019)	*
103. AIP Aegean Residential Assets S.M.S.A. (commencement of operation 2019)	*
104. AIP Ionian Residential Assets S.M.S.A. (commencement of operation 2019)	*
105. AIP Commercial Assets City Centres S.M.S.A. (commencement of operation 2019)	*
106. AIP Thessaloniki Commercial Assets S.M.S.A. (commencement of operation 2019)	*
107. AIP Commercial Assets Rog S.M.S.A. (commencement of operation 2019)	*
108. AIP Attica Retail Assets I S.M.S.A. (commencement of operation 2019)	*
109. AIP Attica Retail Assets II S.M.S.A. (commencement of operation 2019)	*
110. AIP Attica Residential Assets II S.M.S.A. (commencement of operation 2019)	*
111. AIP Retail Assets Rog S.M.S.A. (commencement of operation 2019)	*
112. AIP Land II S.M.S.A. (commencement of operation 2019)	*
113. ABC RE P6 Ltd (commencement of operation 2019)	*
114. AGI-Cypr Property 35 Ltd (commencement of operation 2019)	*
115. AGI-Cypr P&F Larnaca Ltd (commencement of operation 2019)	*
116. AGI-Cypr Property 37 Ltd (commencement of operation 2019)	*
117. AGI-Cypr RES Ammochostos Ltd (commencement of operation 2019)	*
118. AGI-Cypr Property 36 Ltd (commencement of operation 2019)	*
119. AGI-Cypr Property 38 Ltd (commencement of operation 2019)	*
120. AGI-Cypr RES Larnaca Ltd (commencement of operation 2019)	*
121. ABC RE P7 Ltd (commencement of operation 2019)	*
122. AGI-Cypr Property 42 Ltd (commencement of operation 2019)	*
123. ABC RE P&F Larnaca Ltd (commencement of operation 2019)	*
124. Krigeo Holdings Ltd (commencement of operation 2019)	*
125. AGI-Cypr Property 43 Ltd (commencement of operation 2019)	*
126. AGI-Cypr Property 44 Ltd (commencement of operation 2019)	*
127. AGI-Cypr Property 45 Ltd (commencement of operation 2020)	*

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



Name	Year
128. AGI-Cypre PROPERTY 40 Ltd (commencement of operation 2020)	*
129. ABC RE RES Ammochostos Ltd (commencement of operation 2020)	*
130. ABC RE RES Paphos Ltd (commencement of operation 2020)	*
131. Sapava Ltd (commencement of operation 2020)	*
132. AGI-Cypre Property 46 Ltd (commencement of operation 2020)	*
Special purpose and holding entities	
1. Alpha Credit Group Plc (voluntary settlement of tax obligation)	2017
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)	2017
9. Epihiro Plc (voluntary settlement of tax obligation)	2017
10. Irida Plc (voluntary settlement of tax obligation)	2017
11. Pisti 2010 - 1 Plc (voluntary settlement of tax obligation)	2017
12. Alpha Shipping Finance Ltd (voluntary settlement of tax obligation)	2017
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-Cypre Evagoras Ltd (commencement of operation 2014)	*
32. AGI-Cypre Tersefanou Ltd (commencement of operation 2014)	*
33. AGI-Cypre Ermis Ltd (commencement of operation 2014)	*
34. AGI-SRE Participations 1 Ltd (commencement of operation 2016)	*
35. Alpha Credit Acquisition Company Ltd (commencement of operation 2019)	*
36. Alpha International Holding Company S.A. (commencement of operation 2019)	*
37. Reoco Orion X S.M.S.A. (commencement of operation 2020)	*
38. Reoco Galaxy II S.M.S.A. (commencement of operation 2020)	*
39. Reoco Galaxy IV S.M.S.A. (commencement of operation 2020)	*
40. Orion X Securitisation D.A.C. (commencement of operation 2020)	*
41. Galaxy II Funding D.A.C. (commencement of operation 2020)	*
42. Galaxy III Funding D.A.C. (commencement of operation 2020)	*
43. Galaxy IV Funding D.A.C. (commencement of operation 2020)	*
44. Alpha International Holdings S.M.S.A. (commencement of operation 2020)	*

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

**** These companies are not subject to Tax audit.



Name	Year
Other companies	
1. Alpha Bank London Nominees Ltd	****
2. Alpha Trustees Ltd (commencement of operation 2002)	*
3. Kafe Alpha A.E.** / ***	2013
4. Alpha Supporting Services A.E.** / ***	2013
5. Real Car Rental A.E.** / ***	2013
6. Emporiki Management A.E.***	2013
7. Alpha Bank Notification Services A.E. (commencement of operation 2015)	*

c. Off balance sheet liabilities

The Group as part to its normal operations, make 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 approved and undrawn loan commitments.

Letters of credit are used to facilitate trading activities and relate to the financing of contractual agreements for the transfer of goods locally or abroad, through direct payment to the third party on behalf of the Group's customer. 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 customers will fulfill the terms of their contractual obligations.

In addition, contingent liabilities for the Group arise from commitments that may be drawn upon certain requirements are fulfilled by counterparties.

The outstanding balances are as follows:

	30.9.2020	31.12.2019
Letters of credit	29,495	35,927
Letters of guarantee and other guarantees	3,531,946	3,411,293
Undrawn loan commitments	4,309,759	4,021,955

The Group measures the expected credit losses for letters of guarantee, letters of credit and undrawn loan commitments, which are recognized within the Balance Sheet line "Provisions".

The balance of the abovementioned expected credit loss as of 30.9.2020 amounts to € 96,589 (31.12.2019: € 93,440) (note 20).

The Bank has also undertaken the liability to contribute in the share capital of the joint venture Alpha TANEAKES with an additional capital up to the amount of € 46 (31.12.2019: € 23).

d. Assets pledged

Assets pledged, as at 30.9.2020 and 31.12.2019 are analyzed as follows:

- Cash and balances with Central Banks:**

As at 30.9.2020 cash and balances with Central Banks amounted to € 281,087 (31.12.2019: € 318,803) concerning the Group's obligation to maintain deposits in Central Banks according to percentages determined by the respective country. Out of this amount, the reserved funds that the Bank has to maintain to the Bank of Greece on average for the period from 16.9.2020 to 3.11.2020, amounts to € 373,539 (31.12.2019: € 354,853). As at 30.9.2020, the pledged cash of the Bank amounted to € 0 (31.12.2019: € 0).

* 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 2018 without any qualification whereas the years up to and including 2013 are considered as closed in accordance with the Circular of the Ministry of Finance 1208/2017 (note 8).

*** 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 are not subject to Tax audit.



- **Due from banks:**

- Placements amounting to € 211,161 (31.12.2019: € 212,006) relate to guarantees provided mainly on behalf of the Greek Government.
- Placements amounting to € 1,582,614 (31.12.2019: € 1,345,744) relate to guarantees for derivative transactions and other repurchase agreements (repos).
- Placements amounting to € 125,499 (31.12.2019: € 6,455) relate to Letter of Credit or Guarantee Letters that the Bank issues for facilitating customer imports.
- Placements amounting to € 16,066 (31.12.2019: € 12,568) have been provided to the Resolution Fund as irrevocable payment commitment, as part of the 2016 up to 2020 contribution. This commitment must be fully covered by collateral exclusively in cash, as decided by the Single Resolution Board.
- Placements amounting to € 21,793 (31.12.2019: € 20,824) have been given as collateral for the issuance of bonds with nominal value of € 3,700,000 (31.12.2019: € 3,700,000), out of which bonds € 3,000,000 (31.12.2019: € 3,000,000) held by the Bank, as mentioned below under "Loans and advances to customers".

- **Loans and advances to customers:**

- Loans of € 5,528,487 (31.12.2019: € 1,425,026) have been pledged to Central Banks for liquidity purposes.
- A carrying amount of € 1,889,084 (31.12.2019: € 2,822,179) which relates to corporate loans and credit cards has been securitized for the issuance of debt securities by the Group's Special Purpose Entities, with a nominal amount of 2,173,735 (31.12.2019: € 3,274,200) being held by the Bank, out of which a nominal amount of € 581,100 (31.12.2019: € 2,035,800) has been given as collateral for repurchase agreements (repos). For the aforementioned transactions, an amount of € 82 (31.12.2019: € 77,254) of due from banks balances has been provided as collateral.
- A carrying amount of € 230,124 (31.12.2019: € 335,594), which relates to shipping loans, has been securitized for the purpose of financing the Group's Special Purpose Entity. The aforementioned loan was purchased by the Bank from a third investor within September and as at 30.9.2020 amounts to € 46,856 (31.12.2019: € 154,432). For the aforementioned transaction, an amount of € 5,556 (31.12.2019: € 22,493) of due from banks balances has been provided as collateral.
- A carrying amount of € 461,684 (31.12.2019: € 499,242) which relates to consumer loans, has been securitized for the issuance of debt securities by the Group's Special Purpose Entities which on 30.9.2020 amounts to € 580,000 (31.12.2019: € 580,000), out of which an amount of € 360,000 (31.12.2019: € 360,000) is held by the Bank.
- A carrying amount of € 8,155 (31.12.2019: € 11,174) which relates to corporate loans, has been provided as collateral for other borrowing transactions.
- A carrying amount of mortgage loans of € 4,561,233 (31.12.2019: € 4,651,208) has been used as collateral in the following covered bond issuance programs: Covered Bonds Issuance Program I and II and the Bank's Secured Note Program, as well as in the Direct Issuance Covered Bond Program of Alpha Bank Romania. On 30.9.2020 the nominal value of the above mentioned bonds amounted to € 3,700,000 (31.12.2019: € 3,700,000), out of which an amount of € 3,000,000 (31.12.2019: € 3,000,000) is held by the Group and has been used as collateral in the context of repurchase agreements (repos) amounting to € 0 (31.12.2019: € 800,000) and an amount of € 2,200,000 (31.12.2019: € 2,200,000) has been pledged to Central Banks for liquidity purposes.

- **Investment securities:**

- A carrying amount of € 4,342,712 (31.12.2019: € 0) concerns to bonds issued by the greek government that have been given to the European Central Bank for liquidity purposes.
- A carrying amount of € 529,510 (31.12.2019: € 0) concerns to greek government treasury bills that have been given to the European Central Bank for liquidity purposes.



- iii. A carrying amount of € 2,603,745 (31.12.2019: € 1,204,664) concerns to bonds issued by other governments and other issuers that have been given to Central Banks for liquidity purposes.
- iv. A carrying amount of € 223,800 (31.12.2019: € 188,129) concerns to securities issued by the European Financial Stability Facility (EFSF), which have been pledged to Central Banks with the purpose to participate in main refinancing operations
- v. A carrying amount of € 469,199 (31.12.2019: € 3,938,225) concerns to bonds issued by the greek government and has been given as a collateral in the context of repurchase agreements (repo).
- vi. A carrying amount of € 0 (31.12.2019: € 99,936) concerns to greek government treasury bills that has been given as a collateral in the context of repurchase agreements (repo).
- vii. A carrying amount of € 10,210 (31.12.2019: € 40,797) of other corporate bonds has been given as collateral for repurchase agreements (repo) and a carrying amount of € 0 (31.12.2019: € 701,832) which relates to bonds issued by other governments, has been given as collateral for repurchase agreements (repo).

Additionally,

- i. the Bank has received greek government treasury bills of nominal value of € 900,000 (31.12.2019: € 870,000) as collateral for derivatives transactions with counterparty the Greek State out of which a nominal value of € 0 (31.12.2019: € 118,000) has been given as a collateral in the context of repos agreements.
- ii. the Bank has received bonds with a nominal value of € 179,666 (31.12.2019: € 1,127,750) and a fair value of € 200,756 (31.12.2019: € 1,163,277) as collateral in the context of reverse repurchase agreements (reverse repo), which are not recognized in the Bank's balance sheet. From these securities a fair value of € 113,313 (31.12.2019: € 732,960) has been pledged to Central Banks for liquidity purposes and a fair value of € 0 (31.12.2019: € 430,316) has been given as a collateral in the context of repurchase agreements (repo).

24. 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 %	
			30.9.2020	31.12.2019
Banks				
1	Alpha Bank London Ltd	United Kingdom	100.00	100.00
2	Alpha Bank Cyprus Ltd	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
Leasing companies				
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
4	Cepal Holdings A.E.	Greece	100.00	
Investment Banking				
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
Asset Management				
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



Name	Country	Group's ownership interest %	
		30.9.2020	31.12.2019
Insurance			
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
Real Estate and Hotel			
1 Alpha Astika Akinita A.E.	Greece	93.17	93.17
2 Alpha Holdings S.M.S.A.	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.	Greece	100.00	100.00
8 Alpha Investment Property Attikis II A.E.	Greece	100.00	100.00
9 AGI-RRE Participations 1 Srl	Romania	100.00	100.00
10 Stockfort Ltd	Cyprus	100.00	100.00
11 Romfelt Real Estate S.A.	Romania	99.99	99.99
12 AGI-RRE Zeus Srl	Romania	100.00	100.00
13 AGI-RRE Poseidon Srl	Romania	100.00	100.00
14 AGI-RRE Hera Srl	Romania	100.00	100.00
15 Alpha Real Estate Services LLC	Cyprus	93.17	93.17
16 AGI-BRE Participations 2 E.O.O.D.	Bulgaria	100.00	100.00
17 AGI-BRE Participations 2BG E.O.O.D.	Bulgaria	100.00	100.00
18 AGI-BRE Participations 3 E.O.O.D.	Bulgaria		100.00
19 AGI-BRE Participations 4 E.O.O.D.	Bulgaria	100.00	100.00
20 APE Fixed Assets A.E.	Greece	72.20	72.20
21 SC Cordia Residence Srl	Romania		100.00
22 AGI-RRE Cleopatra Srl	Romania	100.00	100.00
23 SC Carmel Residential Srl	Romania	100.00	100.00
24 Alpha Investment Property Neas Kifissias A.E.	Greece	100.00	100.00
25 Alpha Investment Property Kallirois A.E.	Greece	100.00	100.00
26 AGI-Cypre Alaminos Ltd	Cyprus		100.00
27 AGI-Cypre Tochni Ltd	Cyprus	100.00	100.00
28 AGI-Cypre Mazotos Ltd	Cyprus	100.00	100.00
29 Alpha Investment Property Livadias A.E.	Greece	100.00	100.00
30 Asmita Gardens Srl	Romania	100.00	100.00
31 Alpha Investment Property Kefalariou A.E.	Greece	54.17	54.17
32 Cubic Center Development S.A.	Romania	100.00	100.00
33 Alpha Investment Property Neas Erythreas A.E.	Greece	100.00	100.00
34 AGI-SRE Participations 1 D.O.O.	Serbia	100.00	100.00
35 Alpha Investment Property Spaton A.E.	Greece	100.00	100.00
36 TH Top Hotels Srl	Romania	97.50	97.50
37 Alpha Investment Property Kallitheas A.E.	Greece	100.00	100.00
38 Kestrel Enterprise E.O.O.D.	Bulgaria	100.00	100.00
39 Beroe Real Estate E.O.O.D.	Bulgaria	100.00	100.00
40 Alpha Investment Property Irakleiou A.E.	Greece	100.00	100.00
41 Alpha Investment Property GI I A.E.	Greece	100.00	100.00
42 AGI-Cypre Property 2 Ltd	Cyprus	100.00	100.00
43 AGI-Cypre Property 3 Ltd	Cyprus	100.00	100.00
44 AGI-Cypre Property 4 Ltd	Cyprus	100.00	100.00
45 AGI-Cypre Property 5 Ltd	Cyprus	100.00	100.00
46 AGI-Cypre Property 6 Ltd	Cyprus	100.00	100.00
47 AGI-Cypre Property 8 Ltd	Cyprus	100.00	100.00
48 AGI-Cypre Property 7 Ltd	Cyprus	100.00	100.00
49 ABC RE L1 Ltd	Cyprus		100.00
50 AGI-Cypre Property 9 Ltd	Cyprus	100.00	100.00
51 AGI-Cypre Property 10 Ltd	Cyprus	100.00	100.00
52 AGI-Cypre Property 11 Ltd	Cyprus	100.00	100.00



Name	Country	Group's ownership interest %	
		30.9.2020	31.12.2019
53 AGI-Cypre Property 12 Ltd	Cyprus	100.00	100.00
54 AGI-Cypre Property 13 Ltd	Cyprus	100.00	100.00
55 AGI-Cypre Property 14 Ltd	Cyprus	100.00	100.00
56 AGI-Cypre Property 15 Ltd	Cyprus	100.00	100.00
57 AGI-Cypre Property 16 Ltd	Cyprus	100.00	100.00
58 AGI-Cypre Property 17 Ltd	Cyprus	100.00	100.00
59 AGI-Cypre Property 18 Ltd	Cyprus	100.00	100.00
60 AGI-Cypre Property 19 Ltd	Cyprus	100.00	100.00
61 AGI-Cypre Property 20 Ltd	Cyprus	100.00	100.00
62 AGI-Cypre RES Pafos Ltd	Cyprus	100.00	100.00
63 AGI-Cypre P&F Nicosia Ltd	Cyprus	100.00	100.00
64 ABC RE P1 Ltd	Cyprus	100.00	100.00
65 ABC RE P2 Ltd	Cyprus	100.00	100.00
66 ABC RE P3 Ltd	Cyprus	100.00	100.00
67 ABC RE L2 Ltd	Cyprus	100.00	100.00
68 ABC RE P4 Ltd	Cyprus	100.00	100.00
69 AGI-Cypre RES Nicosia Ltd	Cyprus	100.00	100.00
70 AGI-Cypre P&F Limassol Ltd	Cyprus	100.00	100.00
71 AGI-Cypre Property 21 Ltd	Cyprus	100.00	100.00
72 AGI-Cypre Property 22 Ltd	Cyprus	100.00	100.00
73 AGI-Cypre Property 23 Ltd	Cyprus	100.00	100.00
74 AGI-Cypre Property 24 Ltd	Cyprus	100.00	100.00
75 ABC RE L3 Ltd	Cyprus	100.00	100.00
76 ABC RE P&F Limassol Ltd	Cyprus	100.00	100.00
77 AGI-Cypre Property 25 Ltd	Cyprus	100.00	100.00
78 AGI-Cypre Property 26 Ltd	Cyprus	100.00	100.00
79 ABC RE COM Pafos Ltd	Cyprus	100.00	100.00
80 ABC RE RES Larnaca Ltd	Cyprus	100.00	100.00
81 AGI-Cypre P&F Pafos Ltd	Cyprus	100.00	100.00
82 AGI Cypre Property 27 Ltd	Cyprus	100.00	100.00
83 ABC RE L4 Ltd	Cyprus	100.00	100.00
84 ABC RE L5 Ltd	Cyprus	100.00	100.00
85 AGI-Cypre Property 28 Ltd	Cyprus	100.00	100.00
86 AGI-Cypre Property 29 Ltd	Cyprus	100.00	100.00
87 AGI-Cypre Property 30 Ltd	Cyprus	100.00	100.00
88 AGI-Cypre COM Pafos Ltd	Cyprus	100.00	100.00
89 AIP Industrial Assets S.M.S.A.	Greece	100.00	100.00
90 AGI-Cypre Property 31 Ltd	Cyprus	100.00	100.00
91 AGI-Cypre Property 32 Ltd	Cyprus	100.00	100.00
92 AGI-Cypre Property 33 Ltd	Cyprus	100.00	100.00
93 AGI-Cypre Property 34 Ltd	Cyprus	100.00	100.00
94 Alpha Group Real Estate Ltd	Cyprus	100.00	100.00
95 ABC RE P&F Pafos Ltd	Cyprus	100.00	100.00
96 ABC RE P&F Nicosia Ltd	Cyprus	100.00	100.00
97 ABC RE RES Nicosia Ltd	Cyprus	100.00	100.00
98 Fierton Ltd	Cyprus	100.00	100.00
99 AIP Residential Assets Rog S.M.S.A.	Greece	100.00	100.00
100 AIP Attica Residential Assets I S.M.S.A.	Greece	100.00	100.00
101 AIP Thessaloniki Residential Assets S.M.S.A.	Greece	100.00	100.00
102 AIP Cretan Residential Assets S.M.S.A.	Greece	100.00	100.00
103 AIP Aegean Residential Assets S.M.S.A.	Greece	100.00	100.00
104 AIP Ionian Residential Assets S.M.S.A.	Greece	100.00	100.00
105 AIP Commercial Assets City Centres S.M.S.A.	Greece	100.00	100.00
106 AIP Thessaloniki Commercial Assets S.M.S.A.	Greece	100.00	100.00
107 AIP Commercial Assets Rog S.M.S.A.	Greece	100.00	100.00
108 AIP Attica Retail Assets I S.M.S.A.	Greece	100.00	100.00
109 AIP Attica Retail Assets II S.M.S.A.	Greece	100.00	100.00



Name	Country	Group's ownership interest %	
		30.9.2020	31.12.2019
110 AIP Attica Residential Assets II S.M.S.A.	Greece	100.00	100.00
111 AIP Retail Assets Rog S.M.S.A.	Greece	100.00	100.00
112 AIP Land II S.M.S.A.	Greece	100.00	100.00
113 ABC RE P6 Ltd	Cyprus	100.00	100.00
114 AGI-Cypre Property 35 Ltd	Cyprus	100.00	100.00
115 AGI-Cypre P&F Larnaca Ltd	Cyprus	100.00	100.00
116 AGI-Cypre Property 37 Ltd	Cyprus	100.00	100.00
117 AGI-Cypre RES Ammochostos Ltd	Cyprus	100.00	100.00
118 AGI-Cypre Property 36 Ltd	Cyprus	100.00	100.00
119 AGI-Cypre Property 38 Ltd	Cyprus	100.00	100.00
120 AGI-Cypre RES Larnaca Ltd	Cyprus	100.00	100.00
121 ABC RE P7 Ltd	Cyprus	100.00	100.00
122 AGI-Cypre Property 42 Ltd	Cyprus	100.00	100.00
123 ABC RE P&F Larnaca Ltd	Cyprus	100.00	100.00
124 Krigeo Holdings Ltd	Cyprus	100.00	100.00
125 AGI-Cypre Property 43 Ltd	Cyprus	100.00	100.00
126 AGI-Cypre Property 44 Ltd	Cyprus	100.00	100.00
127 AGI-Cypre Property 46 Ltd	Cyprus	100.00	
128 AGI-Cypre Property 40 Ltd	Cyprus	100.00	
129 ABC RE RES Ammochostos Ltd	Cyprus	100.00	
130 ABC RE RES Paphos Ltd	Cyprus	100.00	
131 Sapava Ltd	Cyprus	100.00	
Special purpose and holding entities			
1 Alpha Credit Group Plc	United Kingdom	100.00	100.00
2 Alpha Group Jersey Ltd	Jersey	100.00	100.00
3 Alpha Group Investments Ltd	Cyprus	100.00	100.00
4 Ionian Equity Participations Ltd	Cyprus	100.00	100.00
5 AGI-BRE Participations 1 Ltd	Cyprus	100.00	100.00
6 AGI-RRE Participations 1 Ltd	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	Cyprus	100.00	100.00
16 AGI-RRE Poseidon Ltd	Cyprus	100.00	100.00
17 AGI-RRE Hera Ltd	Cyprus	100.00	100.00
18 Umera Ltd	Cyprus	100.00	100.00
19 AGI-BRE Participations 2 Ltd	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	Cyprus	100.00	100.00
23 AGI-RRE Venus Ltd	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	Cyprus	100.00	100.00
27 AGI-RRE Hermes Ltd	Cyprus	100.00	100.00
28 AGI-RRE Arsinoe Ltd	Cyprus	100.00	100.00
29 AGI-SRE Ariadni Ltd	Cyprus	100.00	100.00
30 Zerelda Ltd	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	Cyprus	100.00	100.00
34 AGI-SRE Participations 1 Ltd	Cyprus	100.00	100.00



Name	Country	Group's ownership interest %	
		30.9.2020	31.12.2019
35 Alpha Credit Acquisition Company Ltd	Cyprus	100.00	100.00
36 Alpha International Holding Company S.A.	Luxembourg	100.00	100.00
37 Reoco Orion X M.A.E.	Greece	100.00	
38 Reoco Galaxy II M.A.E.	Greece	100.00	
39 Reoco Galaxy IV M.A.E.	Greece	100.00	
40 Orion X Securitisation D.A.C.	Ireland		
41 Galaxy II Funding D.A.C.	Ireland		
42 Galaxy III Funding D.A.C.	Ireland		
43 Galaxy IV Funding D.A.C.	Ireland		
44 Alpha International Holding S.M.S.A.	Greece	100.00	
Other companies			
1 Alpha Bank London Nominees Ltd	United Kingdom	100.00	100.00
2 Alpha Trustees Ltd	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 A.E.	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 %	
		30.9.2020	31.12.2019
1 APE Commercial Property A.E.	Greece	72.20	72.20
2 APE Investment Property A.E.	Greece	71.08	71.08
3 Alpha TANE0 AKES	Greece	51.00	51.00
4 Rosequeens Properties Ltd	Cyprus	33.33	33.33
5 Panarae 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 %	
		30.9.2020	31.12.2019
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.	Greece	30.44	30.44
6 Alpha Investment Property Elaiona A.E.	Greece	50.00	50.00
7 Famar S.A.	Luxembourg	47.04	47.04
8 Cepal Holdings A.E.	Greece		38.61
9 Perigenis Commercial Assets A.E.	Greece	32.00	

Detailed information on corporate events for the companies included in the consolidated financial statements is set out in note 32.

With respect to the subsidiaries the following are noted:

The Group's subsidiary Stockfort Ltd consists a group which include Pernik Logistics Park E.O.O.D.

The Group's consolidated financial statements do not include Commercial Bank of London Ltd which is a dormant company and Famar S.A., 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.



With respect to the Associates and Joint Ventures the following are noted:

APE Investment Property is the parent company of a group companies comprising of Symet A.E., Astakos Terminal A.E., Akarport A.E. and NA.VI.PE A.E. subsidiaries. Furthermore, Rosequeens Properties Ltd is the parent company of the subsidiary Rosequeens Properties Srl.

The Group's investment in the aforementioned corporate groups are accounted for using the equity method on their consolidated financial statements, except for APE Investment Property A.E., which has been classified as asset held for sale and is measured in accordance with IFRS 5 (note 31).

During the third quarter of 2020, the Group acquired full control of Cepal Holdings A.E by acquiring the 100% of entity's share capital (note 32). Cepal Holdings S.A. is the parent company of a group comprising of Cepal Hellas Financial Services Societe Anonyme for the Management of Receivables from Loans and Credits, Kaican Services Ltd and Kaican Hellas S.A. subsidiaries. The main object of the Cepal Group is the management of loan portfolios and its liabilities.

The Bank already held 38.61% of the company's share capital and proceeded to its total acquisition in the context of the implementation of the Strategic Plan 2020-2022 (note 34). The acquisition of the remaining share capital was carried out through the exercise of the option to sell shares (put option) of the previous shareholder for which the Bank paid cash € 35,968, while its previous participation in the company was valued at fair value at the date of acquisition in € 29,953. This valuation resulted in a profit amounting to € 14,303, recognized in the "Other financial instruments" line of the income statement (Note 4). The agreement with the seller provides for the payment of a possible price by the Bank if Cepal Holdings S.A. is sold to a third investor above a predetermined price, the fair value of which was zero at the date of redemption.

Due to the short period of time since the date of acquisition, the valuation of the assets, liabilities and the assessment of any contingent liabilities of the Cepal Group have not been finalized. The following table shows the provisional values of Cepal Group's net assets at the date of the acquisition:

	Temporary Fair Value
Cash	1
Due from Banks	7,938
Intangible assets	1,230
Property, plant and equipment	4,027
Other assets	7,435
Other liabilities	(10,042)
Net Assets recognized (A)	10,589
Fair Value of previously held equity by the Group (B)	29,953
Consideration for extra % (C)	35,968
Goodwill (B + C - A)	55,332

Based on the provisional values of the assets and liabilities acquired by the Group, an amount of € 55,332 recognized as goodwill (note 17), which is mainly attributed to customer relations and contracts for the management of loan portfolios. The claims acquired relate mainly to deposits and customer claims from the provision of services, the majority of which relate to the Bank, therefore it is estimated that any losses from the non-collection of future contractual flows of the claims acquired will not be material.

After the acquisition of the control of the company the Group recognized total income of € 2,258 and losses before income tax of € 1,568 from the consolidation of its results within the third quarter of 2020. If the acquisition of the company had taken place on 1.1.2020, the Group's total revenues would have been € 1,686,636 and earnings before income tax amounted to € 137,905.



25. Operating segments

(Amounts in million of Euro)

	1.1 - 30.9.2020						
	Retail Banking	Corporate Banking	Asset Management / Insurance	Investment Banking / Treasury	South-Eastern Europe	Other / Elimination Center	Group
Net interest income	486.8	388.3	11.0	115.2	151.6	0.7	1,153.6
Net fee and commission income	82.8	79.2	37.1	27.0	25.5	(0.1)	251.5
Other income	9.0	(6.5)	(2.2)	247.5	12.9	15.1	275.7
Total income	578.6	461.0	45.9	389.7	190.0	15.7	1,680.9
Total expenses	(415.08)	(121.97)	(27.28)	(22.44)	(163.9)	(37.7)	(788.4)
Impairment losses and pro-visions to cover credit risk	(416.5)	(263.4)	(0.3)	(2.2)	(54.3)		(736.6)
Impairment losses on other financial instruments			(0.8)	(13.4)	(0.5)		(14.7)
Profit / (Loss) before income tax	(252.9)	75.6	17.5	351.7	(28.7)	(22.0)	141.2
Income tax							(10.6)
Profit / (Loss) after income tax							130.6
Assets 30.9.2020	22,904.1	15,780.5	1,474.7	16,829.7	7,940.4	3,636.1	68,565.4
Laibilities 30.9.2020	27,561.1	7,379.8	2,476.5	16,417.8	6,023.0	248.6	60,106.8

Losses before income tax of the “Other / Elimination Centre” operating segment, amounting to € 21.9 million, include expenses from eliminations between operating segments amounting to € 1 million and unallocated expenses amounting to € 20.9 million. These unallocated expenses 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 - 30.9.2019						
	Retail Banking	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
Total income	603.4	482.3	51.0	350.3	199.0	16.8	1,702.8
Total expenses	(445.2)	(133.3)	(26.0)	(20.8)	(152.7)	(45.6)	(823.6)
Impairment losses and pro-visions to cover credit risk	(435.9)	(241.7)	0.1	(1.1)	(71.4)		(750.0)
Impairment losses on other financial instruments			0.6	9.5	0.4		10.5
Profit / (Loss) before income tax	(277.7)	107.3	25.7	337.9	(24.7)	(28.8)	139.7
Income tax							(48.2)
Profit / (Loss) after income tax							91.5
Assets 31.12.2019	21,840.9	14,884.7	1,411.0	13,964.3	7,955.5	3,401.2	63,457.6
Laibilities 31.12.2019	26,257.8	7,494.2	2,382.1	12,577.2	6,090.3	180.4	54,982.0

Losses before income tax of the “Other / Elimination Centre” operating segment, amounting to € 28.6 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.

**i. Retail Banking**

Includes all individuals (retail banking customers), professionals, small and very small companies operating in Greece and on 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

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

iii. Asset Management / Insurance

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. as well as the income from the sale and management of mutual funds.

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

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.) as well as operations related to securitization transactions.

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.

Income and expenses also include transactions between operating segments. All transactions are conducted on market terms. Intersegment transactions are eliminated.

The assets of the operating segments "Retail" and "Corporate Banking" include the Bank's loans as well as those provided by the Group's subsidiaries ABC Factors A.E. and Alpha Leasing A.E., which are being managed by the non performing loans retail and wholesale banking units, in accordance with the Bank's internal procedures.

	30.9.2020			31.12.2019		
	Balance before impairments	Accumulated impairments	Balance after impairments	Balance before impairments	Accumulated impairments	Balance after impairments
Mortgages	6,895,053	(1,723,266)	5,171,787	7,164,613	(1,832,896)	5,331,717
Consumer Loans	2,866,069	(1,541,608)	1,324,462	2,985,867	(1,519,454)	1,466,413
Corporate Loans	7,561,067	(3,769,832)	3,791,234	7,847,306	(3,783,514)	4,063,792
Total	17,322,189	7,034,707	10,287,483	17,997,786	(7,135,864)	10,861,922

According to Bank's decision is expected, within the last quarter, the transfer of the NPE Unit to the Group's subsidiary Cepal, as detailed mentioned in note 34. However, there is no any differentiation in the disclosures of operating segments.



26. Exposure in credit risk from debt issued by the Greek State

The following table presents the Group's total exposure in Greek state securities:

Portfolio	30.9.2020		31.12.2019	
	Nominal value	Carrying amount	Nominal value	Carrying amount
Securities measured at fair value through other comprehensive income	2,694,490	3,161,133	3,321,392	3,980,339
Securities measured at amortized cost	2,367,642	2,704,047	921,600	1,070,730
Trading	50,285	58,435	14,657	17,490
Total	5,112,417	5,923,615	4,257,649	5,068,559

All Greek State securities are classified in level 1 based on the quality of inputs used for the estimation of their fair value.

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

On balance sheet exposures

	Carrying amount	
	30.9.2020	31.12.2019
Derivative financial instruments-assets	850,558	658,048
Derivative financial instruments-liabilities	(17,758)	(32,045)

The Group's exposure in loans to public sector entities / organizations on 30.9.2020 amounted to € 51,695 (31.12.2019: € 58,740). The Group has recognized provision for impairment losses for the above mentioned loans amounting to € 968 as at 30.9.2020 (31.12.2019: € 858). In addition, the balance of Group's loans guaranteed by the Greek State (guaranteed either directly by Greek Government or by Common Ministerial Decisions, loans guaranteed by ETEAN and loans guaranteed by the Hellenic Development Bank) on 30.9.2020 amounted to € 1,084,927 (31.12.2019: € 513,632). For these loans the Group has recognized provision for impairment losses amounting to € 78,592 as at 30.9.2020 (31.12.2019: € 66,889). It is noted that the net carrying amount of loans guaranteed by the Guarantee Fund for Enterprises-Covid 19 of the Hellenic Development Bank amounted to € 586,888 on 30.9.2020.

Off balance sheet exposures

	30.9.2020		31.12.2019	
	Nominal value	Fair value	Nominal value	Fair value
Greek Government Treasury Bills received as collateral for derivatives transactions	900,000	900,090	870,000	869,913

	30.9.2020		31.12.2019	
	Nominal value	Fair value	Nominal value	Fair value
Greek Government bonds received as collateral for providing financing	117,993	138,564	-	-



27. Disclosures relevant to the fair value of financial instruments

Fair value of financial instruments measured at amortized cost

	30.9.2020		31.12.2019	
	Fair value	Carrying amount	Fair value	Carrying amount
Financial Assets				
Loans and advances to customers	39,106,287	39,475,985	38,590,135	38,959,133
Securities measured at amortized cost	3,440,629	3,261,377	1,084,602	1,070,730
Financial liabilities				
Due to customers	41,651,171	41,657,289	40,345,792	40,364,284
Debt securities in issue	1,354,526	1,435,405	1,109,198	1,088,693

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 to customers measured at amortized cost is estimated using the discount model of contractual future cash flows. The components of the discount rate are the interbank market yield curve, the liquidity premium, the operational cost, the capital requirement 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, liquidity premium, the operational cost and the capital requirement comprise the discount rate of impaired loans.

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

The fair value of the securities and 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

	30.9.2020			
	Level 1	Level 2	Level 3	Total fair value
Derivative Financial Assets	2,422	1,286,237		1,288,749
Trading securities				
- Bonds and Treasury bills	62,688			62,688
- Shares	464			464
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury bills	6,789,623	216,257	1,013	7,006,893
- Shares	10,834	41,479	32,304	84,617
Securities measured at fair value through profit or loss				
- Bonds and Treasury bills			11,943	11,943
- Other variable yield securities	38,936			38,936
- Shares	4,924		703	5,627
Loans measured at fair value through profit or loss			291,808	291,808
Other receivables measured at fair value			40,000	40,000
Derivative Financial Liabilities	6	1,778,540		1,778,546

	31.12.2019			
	Level 1	Level 2	Level 3	Total fair value
Derivative Financial Assets	2,288	1,005,925	980	1,009,193
Trading securities				
- Bonds and Treasury bills	17,490	371		17,861
- Shares	890			890
Securities measured at fair value through other comprehensive income				
- Bonds and Treasury bills	7,324,764	131,868	10,532	7,467,164
- Shares	10,853	37,569	41,913	90,335
Securities measured at fair value through profit or loss				
- Bonds and Treasury bills	9,025	1,059	12,497	22,581
- Other variable yield securities	30,334			30,334
- Shares	2,133		493	2,626
Loans measured at fair value through profit or loss			307,136	307,136
Derivative Financial Liabilities		1,446,915		1,446,915

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 securities whose fair value is estimated using significant unobservable inputs.

In regards to the Covid-19 effect it is noted following the relevant measures taken by the Central Banks and countries and the market conditions that have been normalized, we did not proceed, as of 30.9.2020, neither to modification on the valuation methods, nor to adjustments on debt securities and derivatives fair values.



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.

The fair value of loans measured at fair value through profit or loss, is estimated based on the valuation methodology as described above regarding the disclosure of fair value for loans measured at amortized cost.

Shares whose fair value is calculated are classified to Level 2 or Level 3, depending on the extent of the contribution of unobservable data to calculate final fair value. 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 valuation technique or based to the estimations made by the Group which relate 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 considered as both long and short positions may be outstanding. Valuations are checked on a daily basis with the respective prices of the counterparty banks or central clearing counterparties 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. It is noted that on 27.7.2020 the reference interest rate in the discount curve of interest rate derivatives in euro (interest rate swaps) that are centrally cleared, changed from Euro overnight index average (EONIA) to Euro short-term rate (€ STR). Due to the change in the valuation methodology, the fair value of the derivatives was changed and at the same time compensation was received, in order to avoid transfer of value between the two parties. The change in the discount curve has no effect on the Group's results.

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 own 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 derivatives fair values balance taking into consideration the default probability of both the counterparty and the Group, the impact of the first default, the expected OTC derivative exposure and loss given default of the counterparty and of Alpha Bank 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 per counterparty sector categorization and credit quality (as defined for presentation purposes of the table "Loans by credit quality and IFRS 9 Stage") is provided below:

	30.9.2020	31.12.2019
Category of counterparty		
Enterprises	(2,242)	(1,319)
Governments	(27,552)	(11,963)

	30.9.2020	31.12.2019
Qualitative Classification of counterparty's credit risk		
Strong	(1,602)	(104)
Satisfactory	(28,192)	(12,300)
Default		(878)



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

	30.9.2020			
	Total fair value	Fair value	Valuation method	Significant non-observable inputs
Bonds measured at fair value through other comprehensive income	1,013	1,013	Based on issuer price / Discounted cash flows with estimation of bond yields	Issuer price
Shares measured at fair value through other comprehensive income	32,304	32,304	Discounted cash flows / Multiples valuation / WACC	Future profitability of the issuer, expected growth / Valuation indices / WACC
Bonds measured at fair value through profit or loss	11,943	11,943	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	703	703	Discounted cash flows / Multiples valuation / Price of forthcoming transaction	Future profitability of the issuer, expected growth / Valuation indices
Loans measured at fair value through profit or loss	291,808	291,808	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk and the operating cost	Cash flows from counterparty' credit risk
Other receivables valued at fair value	40,000	40,000	Discount of cash flows of the subject portfolio of receivables	Cash flows from the management of the underlying Receivables Portfolio

	31.12.2019			
	Total fair value	Fair value	Valuation method	Significant non-observable inputs
Derivative Financial Assets	980	980	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk	The probability of default and the loss in case of counterparty default that are used in the calculation of the BCVA adjustment are calculated by an internal model
Bonds measured at fair value through other comprehensive income	10,532	10,532	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	41,913	41,913	Discounted cash flows / Multiples valuation	Future profitability of the issuer, expected growth / Valuation indices / WACC
Bonds measured at fair value through profit or loss	12,497	12,497	Based on issuer price / Discounted cash flows with estimation of credit risk	Issuer price / Credit spread / Assessment of the adequacy of reserves for the payment of hybrid securities dividends
Shares measured at fair value through profit or loss	493	493	Discounted cash flows / Multiples valuation / Price of forthcoming transaction	Future profitability of the issuer, expected growth / Valuation indices
Loans measured at fair value through profit or loss	307,136	307,136	Discounted cash flows with interest being the underlying instruments, taking into account the counterparty's credit risk and the operating cost	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 period an amount of € 81.696 of corporate bonds were transferred from Level 1 to Level 2, as the liquidity margin (bid-ask spread) exceeded the limit set for the characterization of market as active in the securities measured at fair value through other comprehensive income.

Within the period corporate bond amounting to € 1,127 transferred from Level 2 to Level 3 since internal models were used for valuation purposes.

Within the comparative period an amount of € 1,978 of Greek corporate bonds were transferred from Level 2 to Level 1, as the liquidity margin (bid-ask spread) determined within the limit set for the characterization of market as active in the securities measured at fair value through other comprehensive income.



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

	30.9.2020				
	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	Other receivables valued at fair value
Balance 1.1.2020	52,445	12,990	307,136	980	
Total gain or loss recognized in Income Statement	898	(277)	(14,919)	27	
- Interests	270	244	9,033		
- Gains less losses on financial transactions	45	(498)	(23,952)	27	
- Impairment losses	583				
Total gain or loss recognized in Equity - Reserves	105				
Total gain or loss recognized in Equity - Retained Earnings	(865)				
Purchases / Disbursements	6,484		20,055		40,000
Sales	(11,172)	(72)	(9,221)		
Repayments			(11,243)		
Settlements				(1,007)	
Transfer out of Level 3 due to gain of control	(14,100)				
Transfer out of Level 3 to "Assets held for sale"	(478)				
Balance 30.9.2020	33,317	12,646	291,808	-	40,000
Gain / (Loss) included in the income statement and relate to financial instruments included in the balance sheet at the end of the reporting period 1.1 - 30.9.2020	2	(407)	(12,513)		
- Interests		192	8,389		
- Gains less losses on financial transactions	2	(599)	(20,902)		
- Impairment losses					

The other receivables valued at fair value through profit or loss relate to a variable price claim of € 40,000 recognised in the nine months of 2020, as detailed in note 13.



	31.12.2019			
	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
Balance 1.1.2019	79,085	9,984	318,460	16,663
Total gain or loss recognized in Income Statement	465	2,020	9,473	3,024
- Interests	417	685	9,511	
- Gains less losses on financial transactions	33	1,335	(38)	3,024
- Impairment losses	15			
Total gain or loss recognized in Equity – Reserves	151			
Total gain or 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 of Level 3 to Level 1		(3)		
Transfer out of Level 3 to Level 2	(3,234)			
Balance 30.9.2019	52,100	11,844	371,745	18,749
Changes for the period 1.10 - 31.12.2019				
Total gain or loss recognized in Income Statement	162	1,168	(22,036)	(17,538)
- Interests	141	134	3,314	-
- Gains less losses on financial transactions		1,034	(25,350)	(17,538)
- Impairment losses	21			
Total gain or loss recognized in Equity - Reserves	(160)			
Total gain or loss recognized in Retained Earnings	(792)			
Purchases / Disbursements	217	10	15,505	-
Repayments / Sales	(209)	(32)	(58,078)	(231)
Transfer in Level 3 from Level 2	1,127			
Balance 31.12.2019	52,445	12,990	307,136	980
Gain / (Loss) included in the income statement and relate to financial instruments included in the balance sheet at the end of the reporting period 1.1 - 30.9.2019	465	1,683	11,162	3,024
- Interests	417	685	9,395	
- Gains less losses on financial transactions	33	998	1,767	3,024
- Impairment losses	15			



Sensitivity analysis for Level 3 financial instruments for which their valuation was based on significant non-observable data as of 30.9.2020 is presented in the following table:

	Significant Non-observable inputs	Quantitative information on non-observable inputs	Non-observable inputs change	Total effect in income statement		Total effect in equity	
				Favourable variation	Unfavourable variation	Favourable variation	Unfavourable variation
Derivative Financial Assets	Assessment of the adequacy of reserves for the payment of hybrid securities dividends	From 2022 to maturity, probability 100%	Increase the probability of dividend payments to 100%		(494)		
Bonds measured at fair value through other comprehensive income	Issuer price	Issuer price equal to 93.15%	Variation +/-10% in estimated return			101	(101)
Shares measured at fair value through other comprehensive income	Valuation indices	Valuation index P/BV 0,17 x 0,916x and EV/Sales 15,506x. WACC +/-1%	Variation +/-10% in valuation indices P/B & EV/ Sales of multiples method. Varied WACC by +/-1%			590	(590)
Bonds measured at fair value through profit or loss	Issuer price - credit spread	Issuer price equal to 74.77% / Average credit spread equal to 1.484 bps	Variation +/-10% in issuer price, +/-10% in adjustment of estimated Credit Risk	1,032	(1,044)		
Loans measured at fair value through profit or loss	Expected loss and cash flows from credit risk of the counterparty	Average credit spread, liquidity premium & operating risk equal to 34,03%	Decrease of the expected cash flows by 10% on loans individually as-sessed		(13,844)		
Other receivables valued at fair value	Cash flows from the management of the underlying Receivables Portfolio	Value of collateral with real estate €607.6 million and preferential claims of third parties €42.4 million	Change of +/-4% in the valuation of real estate collateral. Change +/- 33% in third party preferential claims	9.000	(7.000)		
Total				10.032	(22.382)	691	(691)



Sensitivity analysis for Level 3 financial instruments for which their valuation was based on significant non-observable data as of 31.12.2019 is presented in the following table:

	Significant Non-observable inputs	Quantitative information on non-observable inputs	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 used to calculate the adjustments due to credit risk (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 56%	Increase the probability of default through reduction of internal ratings by 2 scales/increase the loss given default by 10%		(156)		
	Assessment of the adequacy of reserves for the payment of hybrid securities dividends	From 2022 to maturity, probability 100%	Increase the probability of dividend payments to 100%		1		
Bonds measured at fair value through other comprehensive income	Issuer price / Bond yield	Issuer price equal to 94.01% / Bond yield equal to 9.318%	Variation +/-10% in issuer price, Variation -/+10% in estimated return			273	(269)
Shares measured at fair value through other comprehensive income	Future profitability of issuer, expected growth / Valuation indices	Valuation indices P/BV 0.41x, 0.956x and EV / Sales 15.867x. WACC \pm 1%	Applying variation +/-10% in valuation indices P/B & EV / Sales Varied WACC by \pm 1%			653	(652)
Bonds measured at fair value through profit or loss	Issuer price / Credit spread	Average issuer price equal to 89.74% / Average credit spread equal to 1,408 bps	Variation +/-10% in issuer Price, -/+ 10% in adjustment of estimated Credit Risk	1,083	(1,070)		
Loans measured at fair value through profit or loss	Expected credit loss and cash flows from credit risk of the counterparty	Average credit spread, liquidity premium & operating risk equal to 32.91%	Decrease of the expected cash flows by 10% on loans individually assessed		(8,682)		
Total				1,083	(9,908)	926	(921)

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



28. 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 IFRS 9.

More specifically, the classification of financial instruments per stage as well as the movement of accumulated provision for impairment losses per stage, is presented.

a. Due from Banks

	30.9.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired receivables (POCI)	Total
Balance 30.9.2020					
Carrying amount before allowance for impairment losses	2,770,915		69,961		2,840,876
Expected credit losses	(147)		(69,961)		(70,108)
Net carrying amount	2,770,768	-	-	-	2,770,767

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired receivables (POCI)	Total
Balance 31.12.2019					
Carrying amount before allowance for impairment losses	3,332,821		69,961		3,402,782
Expected credit losses	(131)		(69,961)		(70,092)
Net carrying amount	3,332,690	-	-	-	3,332,690



	Accumulated provision for impairment losses				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired receivables (POCI)	Total
Opening balance 1.1.2019	164	-	69,961	-	70,125
Changes for the period 1.1 - 30.9.2019					
Remeasurement of expected credit losses (a)					-
Impairment losses on new receivables (b)	73				73
Change in credit risk parameters (c)	(121)				(121)
Impairment losses on loans (a)+(b)+(c)	(48)	-	-	-	(48)
Derecognition of financial assets					-
Foreign exchange and other movements	27				27
Balance 30.9.2019	143	-	69,961	-	70,104
Changes for the period 1.10 - 31.12.2019					
Remeasurement of expected credit losses (a)					-
Impairment losses on new receivables (b)	41				41
Change in credit risk parameters (c)	(119)				(119)
Impairment losses on loans (a)+(b)+(c)	(78)	-	-	-	(78)
Derecognition of financial assets					-
Foreign exchange and other movements	66				66
Balance 31.12.2019	131	-	69,961	-	70,092
Changes for the period 1.1 - 30.9.2020					
Remeasurement of expected credit losses (a)					-
Impairment losses on new receivables (b)	358				358
Change in credit risk parameters (c)	(340)				(340)
Impairment losses on loans (a)+(b)+(c)	17	-	-	-	17
Derecognition of financial assets					-
Foreign exchange and other movements	(1)				(1)
Balance 30.9.2020	147	-	69,961	-	70,108

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

For credit risk disclosure purposes, the provision for impairment losses of loans to customers measured at amortised cost (i.e. Expected Credit Loss) include the allowance for impairment losses and the fair value adjustment for the contractual balance of loans which were impaired at their acquisition or origination (POCI) since the Group, from credit risk perspective, monitors the respective adjustment as part of the provisions. 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. Relevant adjustment has also been performed at the carrying amount of loans.

It is noted that the credit risk tables do not include the balances and the provision for impairment losses for loans that have been classified as held for sale.

The following table presents loans measured at amortised cost by IFRS 9 stage:

	30.9.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Mortgage					
Carrying amount (before provision for impairment losses)	5,301,527	2,904,802	5,916,748	2,949,886	17,072,963
Expected credit losses	(4,344)	(101,553)	(1,822,297)	(658,836)	(2,587,030)
Net carrying amount	5,297,183	2,803,249	4,094,451	2,291,050	14,485,933
Consumer					
Carrying amount (before provision for impairment losses)	700,436	500,804	1,805,128	1,200,847	4,207,215
Expected credit losses	(10,260)	(101,298)	(1,024,858)	(492,763)	(1,629,179)
Net carrying amount	690,176	399,506	780,270	708,084	2,578,036
Credit Cards					
Carrying amount (before provision for impairment losses)	806,687	133,414	235,391	44,655	1,220,147
Expected credit losses	(13,778)	(42,553)	(139,026)	(30,808)	(226,165)
Net carrying amount	792,909	90,861	96,365	13,847	993,982
Small business					
Carrying amount (before provision for impairment losses)	651,488	806,337	2,645,723	879,889	4,983,437
Expected credit losses	(9,408)	(59,168)	(1,139,398)	(387,124)	(1,595,098)
Net carrying amount	642,080	747,169	1,506,325	492,765	3,388,339
Total retail lending					
Carrying amount (before provision for impairment losses)	7,460,138	4,345,357	10,602,990	5,075,277	27,483,762
Expected credit losses	(37,790)	(304,572)	(4,125,579)	(1,569,531)	(6,037,472)
Net carrying amount	7,422,348	4,040,785	6,477,411	3,505,746	21,446,290
Corporate lending and public sector					
Carrying amount (before provision for impairment losses)	13,255,240	1,565,593	5,051,487	1,051,710	20,924,030
Expected credit losses	(127,882)	(50,435)	(2,463,467)	(525,780)	(3,167,564)
Net carrying amount	13,127,358	1,515,158	2,588,020	525,930	17,756,466
Total loans					
Carrying amount (before provision for impairment losses)	20,715,378	5,910,950	15,654,477	6,126,987	48,407,792
Expected credit losses	(165,672)	(355,007)	(6,589,046)	(2,095,311)	(9,205,036)
Net carrying amount	20,549,706	5,555,943	9,065,431	4,031,676	39,202,756

"Purchased or originated credit impaired loans" include loans amounting to € 973,838 (31.12.2019: € 883,149) which, as at 30.9.2020 are not credit impaired / non performing.



	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired loans (POCI)	Total
Mortgage					
Carrying amount (before provision for impairment losses)	5,410,873	2,877,928	6,167,611	3,017,307	17,473,719
Expected credit losses	(4,837)	(100,889)	(1,919,141)	(701,123)	(2,725,990)
Net Carrying Amount	5,406,036	2,777,039	4,248,470	2,316,184	14,747,729
Consumer					
Carrying amount (before provision for impairment losses)	729,212	441,947	1,860,175	1,226,358	4,257,692
Expected credit losses	(9,608)	(85,983)	(1,015,872)	(498,756)	(1,610,219)
Net Carrying Amount	719,604	355,964	844,303	727,602	2,647,473
Credit Cards					
Carrying amount (before provision for impairment losses)	920,956	118,641	237,726	46,607	1,323,930
Expected credit losses	(13,015)	(36,617)	(121,252)	(29,554)	(200,438)
Net Carrying Amount	907,941	82,024	116,474	17,053	1,123,492
Small business loans					
Carrying amount (before provision for impairment losses)	470,679	699,947	2,783,878	886,530	4,841,034
Expected credit losses	(2,750)	(72,942)	(1,146,639)	(401,352)	(1,623,683)
Net Carrying Amount	467,929	627,005	1,637,239	485,178	3,217,351
Total retail lending					
Carrying amount (before provision for impairment losses)	7,531,720	4,138,463	11,049,390	5,176,802	27,896,375
Expected credit losses	(30,210)	(296,431)	(4,202,904)	(1,630,785)	(6,160,330)
Net Carrying Amount	7,501,510	3,842,032	6,846,486	3,546,017	21,736,045
Corporate lending and public sector					
Carrying amount (before provision for impairment losses)	12,772,573	1,211,622	5,171,408	1,068,656	20,224,259
Expected credit losses	(88,061)	(40,958)	(2,519,718)	(523,923)	(3,172,660)
Net Carrying Amount	12,684,512	1,170,664	2,651,690	544,733	17,051,599
Total loans					
Carrying amount (before provision for impairment losses)	20,304,293	5,350,085	16,220,798	6,245,458	48,120,634
Expected credit losses	(118,271)	(337,389)	(6,722,622)	(2,154,708)	(9,332,990)
Net Carrying Amount	20,186,022	5,012,696	9,498,176	4,090,750	38,787,644



The following table includes the movement in the provision for impairment losses of loans measured at amortised cost.

	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	
Balance 1.1.2020	30,210	296,431	4,202,904	1,630,785	6,160,330	88,061	40,958	2,519,718	523,923	3,172,660	9,332,990
Changes for the period 1.1.- 30.9.2020											
Transfers to stage 1 from stage 2 or 3	56,817	(53,860)	(2,957)		-	15,655	(11,732)	(3,923)		-	-
Transfers to stage 2 from stage 1 or 3	(10,278)	83,407	(73,129)		-	(11,359)	15,287	(3,928)		-	-
Transfers to stage 3 from stage 1 or 2	(323)	(46,548)	46,871		-	(2,017)	(16,777)	18,794		-	-
Net remeasurement of loss allowance (a)	(46,133)	48,172	24,686	1,169	27,894	(7,996)	3,293	48,401	(49)	43,649	71,543
Impairment losses on new loans (b)	8,330			(1,665)	6,665	17,397			(4,655)	12,742	19,407
Change in risk parameters (c)	1,054	(11,865)	298,972	104,508	392,669	28,330	19,283	86,233	33,926	167,772	560,441
Impairment losses on loans (a) + (b) + (c)	(36,749)	36,307	323,658	104,012	427,228	37,731	22,576	134,634	29,222	224,163	651,391
Derecognition of loans	(1)	(55)	(772)	(722)	(1,550)	(31)	(2)	(2,806)	(163)	(3,002)	(4,552)
Write offs	(956)	(11,383)	(344,714)	(161,999)	(519,052)		(1,034)	(257,454)	(30,800)	(289,288)	(808,340)
Foreign exchange and other movements	(930)	273	(7,268)	6,586	(1,339)	(158)	1,159	7,266	(8,784)	(517)	(1,856)
Change in the present value of the impairment losses			(19,014)	(9,131)	(28,145)			51,166	12,382	63,548	35,403
Balance 30.9.2020	37,790	304,572	4,125,579	1,569,531	6,037,472	127,882	50,435	2,463,467	525,780	3,167,564	9,205,036



	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
Balance 1.1.2019	25,267	213,745	5,034,516	1,857,745	7,131,273	115,353	68,219	3,927,356	784,167	4,895,095	140,620	281,964	8,961,872	2,641,912	12,026,368
Changes for the period 1.1. - 30.9.2019															
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	(121,329)		-	(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		-	(3,633)	(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	111,484	205,958	(14,871)	4,523	195,481	23,549	208,682	(10,828)	313	290,122	135,033	414,640
Impairment losses on loans (a) + (b) + (c)	(24,948)	13,166	169,090	107,602	264,910	(6,335)	5,669	267,651	22,417	289,402	(31,283)	18,835	436,741	130,019	554,312
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)	(11)	20,847	17,565	36,643	330	3,115	(9,948)	4,565	(1,938)	(1,428)	3,104	10,899	22,130	34,705
Change in the present value of the impairment losses			(22,390)	(21,909)	(44,299)			39,798	10,200	49,998			17,408	(11,709)	5,699
Reclassification of 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)
Balance 30.9.2019	26,832	222,907	4,449,345	1,706,954	6,406,038	107,620	69,886	2,505,798	474,670	3,157,974	134,452	292,793	6,955,143	2,181,624	9,564,012
Changes for the period 1.10 - 31.12.2019															
Transfers to stage 1 from stage 2 or 3	20,808	(16,725)	(4,083)		-	14,283	(13,918)	(365)		-	35,091	(30,643)	(4,448)		-
Transfers to stage 2 from stage 1 or 3	(3,561)	59,632	(56,071)		-	(484)	3,363	(2,879)		-	(4,045)	62,995	(58,950)		-
Transfers to stage 3 from stage 1 or 2	(81)	(13,658)	13,739		-	(2,075)	(3,582)	5,657		-	(2,156)	(17,240)	19,396		-
Net remeasurement of loss allowance (a)	(17,479)	(7,686)	22,476	(5,955)	(8,644)	(5,077)	(1,891)	19,584		12,616	(22,556)	(9,577)	42,060	(5,955)	3,972
Impairment losses on new loans (b)	1,015	(69)	(154)	(852)	(60)	3,772	(261)	(268)	(3,301)	(58)	4,787	(330)	(422)	(4,153)	(118)
Change in risk parameters (c)	3,009	60,627	41,858	25,181	130,675	(26,645)	(13,750)	69,175	26,624	55,404	(23,636)	46,877	111,033	51,805	186,079
Impairment losses on loans (a) + (b) + (c)	(13,455)	52,872	64,180	18,374	121,971	(27,950)	(15,902)	88,491	23,323	67,962	(41,405)	36,970	152,671	41,697	189,933
Derecognition of loans	(6)	(88)	(961)	(1,26)	(1,181)	(30)	(17)	(19,035)	(664)	(19,746)	(36)	(105)	(19,996)	(790)	(20,927)
Write offs	(259)	(8,465)	(250,299)	(89,052)	(348,075)			(108,188)	(19,065)	(127,253)	(259)	(8,465)	(358,487)	(108,117)	(475,328)
Foreign exchange and other movements	(116)	(44)	(2,087)	1,638	(609)	(3,303)	1,128	1,874	247	(54)	(3,419)	1,084	(213)	1,885	(663)
Change in the present value of the impairment losses			(11,029)	(7,003)	(18,032)			16,878	3,173	20,051		5,849		(3,830)	2,019
Reclassification of provision for impairment losses to 'Assets held for sale'	48		170		218			31,487	42,239	73,726	48		31,657	42,239	73,944
Balance 31.12.2019	30,210	296,431	4,202,904	1,630,785	6,160,330	88,061	40,958	2,519,718	523,923	3,172,660	118,271	337,389	6,722,622	2,154,708	9,332,990



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

	30.9.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2020	16,026	2,289	75,118	7	93,440
Changes for the period 1.1. - 30.9.2020					
Transfers to stage 1 from stage 2 or 3	3,010	(2,864)	(146)		-
Transfers to stage 2 from stage 1 or 3	(2,165)	2,237	(72)		-
Transfers to stage 3 from stage 1 or 2	(89)	(191)	280		-
Net remeasurement of loss allowance (a)	(2,233)	5,051	816		3,634
Impairment losses on new exposures (b)	1,846				1,846
Change in risk parameters (c)	(4,831)	5,159	(1,515)	1	(1,186)
Impairment losses (a) + (b) + (c)	(5,218)	10,210	(699)	1	4,294
Foreign exchange and other movements	(1,534)	530	(135)	(6)	(1,145)
Balance 30.9.2020	10,030	12,211	74,346	2	96,589

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired (POCI)	Total
Balance 1.1.2019	15,176	3,815	73,069	161	92,221
Changes for the period 1.1 - 30.9.2019					
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 exposures (b)	1,267				1,267
Change in risk parameters (c)	1,107	1,846	3,729	(146)	6,536
Impairment losses (a)+(b)+(c)	12	2,696	9,145	(146)	11,707
Foreign exchange and other movements		49	(28)	11	32
Balance 30.9.2019	17,101	4,616	82,217	26	103,960
Changes for the period 1.10 - 31.12.2019					
Transfers to stage 1 (from stage 2 or 3)	222	(177)	(45)		-
Transfers to stage 2 (from stage 1 or 3)	(37)	38	(1)		-
Transfers to stage 3 (from stage 1 or 2)	(29)	(60)	89		-
Net remeasurement of loss allowance (a)	(457)	359	2,960		2,862
Impairment losses on new exposures (b)	261				261
Change in risk parameters (c)	(917)	(2,479)	(10,174)	(9)	(13,579)
Impairment losses (a)+(b)+(c)	(1,113)	(2,120)	(7,214)	(9)	(10,456)
Foreign exchange and other movements	(118)	(8)	72	(10)	(64)
Balance 31.12.2019	16,026	2,289	75,118	7	93,440

The total amount of provisions for credit risk that the Group has recognized and derive from contracts with customers stands at € 9,346,397 as at 30.9.2020 (31.12.2019: € 9,467,441), taking into consideration the provisions for impairment losses on loans measured at amortised cost of € 9,205,036 (31.12.2019: € 9,332,990), the provisions for letters of guarantee, letters of credit and undrawn loan commitments of amount € 96,589 (31.12.2019: € 93,440) and the provisions for impairment losses on advances to customers of amount € 44,772 (31.12.2019: € 41,011).



c. Investment securities

i. Securities measured at fair value through other comprehensive income

The following table presents the classification of investment securities per stage and the movement of accumulated provision for impairment losses per stage:

	30.9.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government bonds					
Expected credit losses	(14,798)				(14,798)
Fair value	3,161,133				3,161,133
Other Government bonds					
Expected credit losses	(874)				(874)
Fair value	1,949,158				1,949,158
Other securities					
Expected credit losses	(3,343)	(640)			(3,983)
Fair value	1,892,843	3,759			1,896,602
Total securities measured at fair value through other comprehensive income					
Expected credit losses	(19,015)	(640)	-	-	(19,655)
Fair value	7,003,134	3,759	-	-	7,006,893

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government bonds					
Expected credit losses	(21,064)				(21,064)
Fair value	3,980,339				3,980,339
Other Government bonds					
Expected credit losses	(1,112)				(1,112)
Fair value	1,981,294				1,981,294
Other securities					
Expected credit losses	(3,598)	(64)			(3,662)
Fair value	1,504,293	1,238			1,505,531
Total securities measured at fair value through other comprehensive income					
Expected credit losses	(25,774)	(64)	-	-	(25,838)
Fair value	7,465,926	1,238	-	-	7,467,164

Except from the above securities, within investment securities measured at fair value through other comprehensive income portfolio are also included shares of fair value amounting to € 84,616 (31.12.2019: € 90,335).



	Accumulated provision for impairment losses				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Balance 1.1.2019	57,233	241			57,474
Changes for the period 1.1 - 30.9.2019					
Transfers to Stage 2 from Stage 1 or 3	(8)	8			-
Remeasurement of expected credit losses (a)		93			93
Impairment losses on new securities (b)	16,826				16,826
Change in credit risk parameters (c)	(29,843)	(238)			(30,081)
Impairment losses on securities (a)+(b)+(c)	(13,017)	(145)	-	-	(13,162)
Derecognition of financial assets	(16,230)	(28)			(16,258)
Foreign exchange and other movements	11				11
Balance 30.9.2019	27,989	76	-	-	28,065
Changes for the period 1.10 - 31.12.2019					
Transfers to Stage 2 from Stage 1 or 3					-
Remeasurement of expected credit losses (a)					-
Impairment losses on new securities (b)	908				908
Change in credit risk parameters (c)	762	(12)	-	-	750
Impairment losses on securities (a)+(b)+(c)	1,670	(12)			1,658
Derecognition of financial assets	(3,882)				(3,882)
Foreign exchange and other movements	(3)				(3)
Balance 31.12.2019	25,774	64	-	-	25,838
Changes for the period 1.1 - 30.9.2020					
Transfers to Stage 1 (from Stage 2 or 3)	58	(58)			-
Transfers to Stage 2 (from Stage 1 or 3)	(18)	18			-
Remeasurement of expected credit losses (a)	(46)	422			376
Impairment losses on new securities (b)	4,314	187			4,501
Change in credit risk parameters (c)	(1,416)	9			(1,407)
Impairment losses on securities (a)+(b)+(c)	2,852	618			3,470
Derecognition of financial assets	(9,568)	(2)			(9,570)
Foreign exchange and other movements	(83)				(83)
Balance 30.9.2020	19,015	640	-	-	19,655

The results of the nine month period of 2020, include a further increase of € 42 (30.9.2019: € 20 additional decrease) in the expected credit losses in Stage 1, which relates to the movement of the accumulated impairment, between the end and the beginning of the nine-month period, of the securities purchased in the FVOCI portfolio which have been agreed but not settled on these two dates. The said accumulated impairment, depending on the valuation of the issues is recorded in "Other assets" or "Other liabilities" caption.



ii. Securities measured at amortised cost

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

	30.9.2020				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government bonds					
Carrying amount (before allowance for impairment losses)	2,721,382				2,721,382
Expected credit losses	(17,335)				(17,335)
Net carrying amount	2,704,047	-	-	-	2,704,047
Other Government debt securities					
Carrying amount (before allowance for impairment losses)	496,191				496,191
Expected credit losses	(186)				(186)
Net carrying amount	496,005				496,005
Other debt securities					
Carrying amount (before allowance for impairment losses)	62,369				62,369
Expected credit losses	(1,044)				(1,044)
Net carrying amount	61,325				61,325
Total securities measured at amortized cost					
Carrying amount (before allowance for impairment losses)	3,279,942	-	-	-	3,279,942
Expected credit losses	(18,565)	-	-	-	(18,565)
Net carrying amount	3,261,377	-	-	-	3,261,377

	31.12.2019				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Greek Government bonds					
Carrying amount (before allowance for impairment losses)	1,078,143				1,078,143
Expected credit losses	(7,413)				(7,413)
Net Carrying Amount	1,070,730	-	-	-	1,070,730
Total securities measured at amortized cost					
Carrying amount (before allowance for impairment losses)	1,078,143	-	-	-	1,078,143
Expected credit losses	(7,413)	-	-	-	(7,413)
Net Carrying Amount	1,070,730	-	-	-	1,070,730



	Accumulated provision for impairment losses				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired securities (POCI)	Total
Opening balance 1.1.2019	-	-	-	-	-
Changes for the period 1.1 - 30.9.2019					
Transfers to Stage 2 (from Stage 1 or 3)					-
Remeasurement of expected credit losses (a)					-
Impairment losses on new securities (b)	2,698				2,698
Change in credit risk parameters (c)					-
Impairment losses on securities (a)+(b)+(c)	2,698	-	-	-	2,698
Derecognition of financial assets					-
Foreign exchange and other movements					-
Balance 30.9.2019	2,698	-	-	-	2,698
Changes for the period 1.10 - 31.12.2019					
Transfers to Stage 2 from Stage 1 or 3					-
Remeasurement of expected credit losses (a)					-
Impairment losses on new securities (b)	4,715				4,715
Change in credit risk parameters (c)					-
Impairment losses on securities (a)+(b)+(c)	4,715	-	-	-	4,715
Derecognition of financial assets					-
Foreign exchange and other movements					-
Balance 31.12.2019	7,413	-	-	-	7,413
Changes for the period 1.1 - 30.9.2020					
Remeasurement of expected credit losses (a)					-
Impairment losses on new securities (b)	11,552				11,552
Change in credit risk parameters (c)	(396)				(396)
Impairment losses on securities (a)+(b)+(c)	11,156	-	-	-	11,156
Derecognition of financial assets	(4)				(4)
Foreign exchange and other movements					
Balance 30.9.2020	18,565	-	-	-	18,565

29. 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 of 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 Committee Acts set the following capital buffers:
 - Countercyclical capital buffer equal to “zero percent” (0%) for 2020
 - Other systemically important institutions (O-SII) buffer, which will gradually rise to “one percent” (1%) from 1.1.2019 to 1.1.2022. For 2020, the O-SII buffer stands at 0.5%.

These limits should be met both on a standalone and on consolidated basis.

The below table the Group's Capital adequacy ratios:

	30.9.2020	30.9.2020 (pro-forma)*	31.12.2019
Common Equity Tier I Ratio	16.9%	17.2%	17.9%
Tier I Ratio	16.9%	17.2%	17.9%
Total Capital Adequacy Ratio**	18.0%	18.3%	17.9%

On 10 December 2019, the ECB informed Alpha Bank that since 1st January 2020 the minimum limit for the Overall Capital Requirement (OCR) is 14%, increased by 0.25%, due to 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 which corresponds to 3%, and the combined buffer requirements (CBR), according to article 128(6) of the Directive 2013/36/EU which correspond to 3%. The above minimum ratio should be maintained on a phase-in basis under applicable transitional rules of the CRR/CRD IV, at all times.

As per the recently announced regulatory measures by European Banking Authority (EBA) and ECB, in view of the Covid-19 outbreak, decided that European banking institutions can temporarily deviate from the minimum capital regulatory thresholds.

Specifically, on 12 March, the ECB and the EBA announced the following relaxation measures for the minimum capital requirements for Banks in the Eurozone:

- Banks are temporarily allowed to operate below the level of capital defined by the Capital Conservation Buffer and the Countercyclical Buffer. In addition, on 28 July 2020, the ECB announced through a press release that financial institutions are allowed to operate below the aforementioned thresholds at least up to the end of 2022.
- Furthermore, the upcoming change under CRD V regarding the P2R buffer was brought forward allowing the Pillar 2 requirement (P2R) to be covered by Additional Tier 1 (AT1) capital and Tier 2 (T2) capital and not only by CET 1.

The European Commission decided to revise the existing regulatory framework by bringing forward regulations that would normally come with the CRR2/CRDV framework as well as provide a greater flexibility to the phase-in of the impact of the IFRS 9 on capital. These amendments aim to tackle the emergency situation and do not alter fundamentally the prudential regulatory framework. The revised framework was published in the Official Journal of the European Union as at June 22, 2020.

* On the above mentioned ratios have also been included the profit for 9M 2020

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



Finally on 26 June 2020, the Bank of Greece under an Executive Committee Act determined the capital buffer of systemically important institutions (O-SII) at 0.50%, maintaining stable for 2021.

EU-wide stress test is primarily focused on the assessment of the impact of risk drivers on the solvency of banks. Banks are required to stress a common set of risks (credit risk – including securitisations – market risk and counterparty credit risk, operational risk – including conduct risk). The EU – Stress Test is a biannual exercise. However due to the outbreak of Covid-19 (Coronavirus) and its global spread, EBA decided to postpone until 2021 the EU-wide Stress Test Exercise of 2020 to allow banks to focus on and ensure continuity of their core operations. For 2020, the EBA carries out additional EU-wide transparency exercise in order to provide updated information on banks' exposures and asset quality to market participants. On 30.7.2020, EBA announced that the EU-wide Stress Test will be carried out in 2021, at the highest level of consolidation and that exercise is expected to be launched at the end of January 2021 and its results to be published at the end of July 2021.

It is noted that on February 13th 2020, Alpha Bank successfully issued a € 500 million, Tier 2 bond with 10-year maturity callable after 5 years at a yield of 4.25%, listed on the Luxembourg Stock Exchange. The transaction is an integral part of Alpha Bank's strategy which has optimized the Bank's capital structure and has diversified its capital sources.

The issuance provides Alpha Bank an alternative funding source beyond its existing customer deposits, European Central Bank funding and interbank repos. In addition, it allows reduced reliance on secured funding that requires pledged assets, improving its overall funding and liquidity profile.

Finally, European Central Bank published on 16.9.2020 a decision related to the temporary exclusion of certain exposures to central banks from the total exposure measure of the Leverage Ratio in view of the Covid-19 pandemic. Specifically, the exposures that may be excluded comprise coins and banknotes constituting legal currency in the jurisdiction of the central bank and assets representing claims on the central bank, including reserves held at the central bank. It is expected that the exclusion -under Article 500b of Regulation (EU) No 575/2013 until 27 June 2021- of certain central bank exposures from the total exposure measure would support credit institutions in continuing to fulfil their role in funding the real economy, while preserving the key elements of the prudential regulatory framework.

30. Related-party transactions

The Bank and other Group companies, 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 the active for each reporting period key management personnel, consisting of members of the Board of Directors and the Bank's Executive Committee, their close family members and the entities controlled by them, are as follows:

	30.9.2020	31.12.2019
Assets		
Loans and advances to customers	1,642	1,759
Liabilities		
Due to customers	4,656	3,176
Employee defined benefit obligations	238	277
Provisions		1,253
Total	4,894	4,706
Letters of guarantee and approved limits	2,222	2,059



In the following table are presented the results of the transactions with such related parties

	From 1 January to 30.9.2020	30.9.2019
Income		
Interest and similar income	29	31
Fee and commission income	3	5
Other income	1	
Total	33	36
Expenses		
Interest expense and similar charges	7	17
Fee and commission expenses	1	
General administrative expenses		1
Remuneration paid to key management and close family members	3,460	3,085
Total	3,468	3,103

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

	30.9.2020	31.12.2019
Assets		
Loans and advances to customers	63,624	61,857
Other assets	1,418	1,046
Total	65,042	62,903
Liabilities		
Due to customers	15,203	18,670
Other liabilities		2,265
Total	15,203	20,935

	From 1 January to 30.9.2020	30.9.2019
Income		
Interest and similar income	1,090	1,281
Fee and commission income	2	3
Gains less losses on financial transactions	2,022	3,081
Other income	114	129
Total	3,228	4,494
Expenses		
Interest expense and similar charges	2	7
General administrative expenses	5,844	11,930
Total	5,846	11,937

c. 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 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 30.9.2020	30.9.2019
Income		
Fee and commission income	3	6

**31. Assets held for sale**

	30.9.2020	31.12.2019
APE Commercial Property A.E., APE Investment Property A.E.	42,300	46,217
Alpha Investment Property Attikis II A.E.	23,779	23,359
Alpha Investment Property Gi I A.E.	25,000	25,000
AGI-Cypre Alaminos Ltd		4,412
AGI-Cypre Property 2 Ltd	725	
ABC RE P2 Ltd	2,068	2,056
ABC RE P4 Ltd	729	742
Fierton Ltd	6,442	
AGI-BRE Participations 3 EOOD		11,748
Portfolio of non performing loans	146,021	431,688
Fixed assets of Alpha Bank S.A.		14,119
Investment Property of Alpha Leasing A.E.	1,282	97
Alpha Investment Property Neas Erythreas A.E.	6,422	
Investment Property ABC RE COM Pafos Ltd		281
Fixed Assets of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd	126	1,562
Other assets held for sale	2,152	2,238
Total	257,046	563,519

	30.9.2020	31.12.2019
Liabilities related to assets held for sale		
Alpha Investment Property Attikis II A.E.	267	145
Alpha Investment Property Gi I E.	245	125
AGI-Cypre Alaminos Ltd		5
AGI-Cypre Property 2 Ltd	8	
ABC RE P2 Ltd	26	21
ABC RE P4 Ltd	24	10
Fierton Ltd	13	
AGI-BRE Participations 3 EOOD		495
Total	583	801

The Group has begun the process for the sale of specific subsidiaries and joint ventures, portfolio of non-performing retail and wholesale loans, as well as items of property of the Bank and of certain subsidiaries, and for which the requirements to be classified as “Assets held for sale” in accordance with IFRS 5 are met. The balances of such assets are presented in the tables above and described in detail below.

In addition within the nine month period of 2020 the disposal of the Group’s subsidiaries AGI-Cypre Alaminos Ltd (Cyprus) and AGI-BRE Participations 3 EOOD (Bulgaria) was completed, both classified as assets held for sale in 2019, and of the Group subsidiary ABC RE L1 LTD (Cyprus) which had been classified as asset held for sale during 2020.

APE Commercial Property A.E. and APE Investment Property A.E.

During the fiscal year 2016 sale consultants were engaged in order to begin the liquidation process of the Bank’s participations in joint ventures APE Commercial Property A.E. and APE Investment Property A.E. The companies were classified as held for sale according to IFRS 5.

As far as APE Investment Property is concerned, the Group is at an advanced stage in the process of selling its participation and, it is considered possible, to reach an agreement in the near future.

As far as APE Commercial Property A.E. is concerned, subsequent to the classification in the held for sale category it was decided by the joint shareholders, the Bank and Piraeus Bank, the amendment of the planned transaction and proceeded on



November of 2017 with the disposal of the sole asset of the entity, its participation in associate EL.PET. Valkaniki A.E. As a result of the aforementioned disposal, APE Commercial Property A.E. performed a share capital refund to its shareholders during 2018 amounting to € 15,906, of which an amount of € 11,484 relates to share capital refund to the Bank.

The Bank considering the above plans the liquidation of the joint venture in the near future, which will be mutually conducted with the joint shareholder. As a result, it was assessed that the criteria to be classified as "Asset held for Sale" was not met as of 30.9.2020 and the entity has been reclassified at "Investments in associates and joint ventures", at its recoverable amount at the time it was classified as held for sale.

According to IFRS 5 the assets held for sale or disposal groups are valued at the lower of book and fair value less cost to sell and they are presented in the balance sheet separately from other assets and liabilities. With regards to the joint venture APE Investment Property A.E., the Group measured the fair value of its participation and of the loans and receivables due from the entity which constitute part of the net investment in it. From the aforementioned measurement there was no impact in the income statement during the financial year 2019 and the nine month period of 2020.

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

The following table presents the analysis of assets and liabilities of APE Investment Property A.E. and APE Commercial Property A.E. (only for the comparative period) which are presented in balance sheet as "Assets held for sale".

	30.9.2020	31.12.2019
Assets		
Investments in associates and joint ventures	42,300	58,961
Fair value adjustment		(12,744)
Assets held for sale	42,300	46,217
Amounts recognized directly in Equity related to assets held for sale		(122)

Alpha Investment Property Attikis II A.E. & Alpha Investment Property GI I A.E.

During the year 2019 the process of obtaining binding offers for the sale of Alpha Investment Property Attikis II A.E. was completed and the sale is expected to be completed within 2020 at a consideration exceeding the entity's net assets.

In addition, the transfer of shares of AEP GI I A.E. is expected to be completed within the fourth quarter of 2020 in the context of the transaction for the sale of non-performing loans.

According to IFRS 5, the above companies were classified as Assets Held for sale as at 31.12.2019. The Group valued the assets and liabilities of these subsidiaries at the lowest amount between the carrying amount and the fair value less cost to sell. The valuation had no impact.

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

AGI-Cypré Alaminos Ltd, ABC RE P2 Ltd, ABC RE P4 Ltd, AGI-Cypré Property 2 Ltd, ABC RE L1 Ltd & Fierton Ltd

During 2019 the Group began the process of disposing its subsidiaries in Cyprus AGI-Cypré Alaminos Ltd, ABC RE P2 Ltd and ABC RE P4 Ltd while during the nine month period of 2020 it began the process of disposing the subsidiaries in Cyprus AGI-Cypré Property 2 Ltd, ABC RE L1 Ltd and Fierton Ltd.

Especially for AGI-Cypré Alaminos Ltd, on 14.11.2019, a sale agreement was signed for total amount of its shares, and the sale was completed on 07.01.2020. The consideration of the transaction amounted to € 4,686, and a gain of € 127 was recognized in "Gains less losses on financial transactions".



Additionally, on 5.8.2020 the disposal of the shares of ABC RE L1 Ltd was completed for a consideration of € 950, and a gain of € 26 was recognized in the "Gains less losses on financial transactions".

According to IFRS 5, the remaining subsidiaries were classified as assets held for sale at the reporting date. The Group valued the assets and liabilities of the subsidiaries at the lowest between their carrying amount and their fair value less cost to sell. The aforementioned valuation did not result in any impact for ABC RE P2 Ltd, AGI-Cypre Property 2 Ltd and Fierton Ltd. However, a loss amounting to € 26 and € 15 was recognized in 2019 and in the nine month period of 2020 respectfully in "Gains less losses on financial transactions" in the Income Statement for ABC RE P4 Ltd.

Taking into account that the companies do not comprise a separate major lines of business of the Group, the criteria to be classified as "discontinued operations" are not met. These companies are included in segment "S.E. Europe" for the purpose of operating segment disclosures.

AGI-BRE Participations 3 E.O.O.D.

In 2019 the Group initiated the process to dispose its participation in AGI-BRE Participations 3 EOOD. In particular, on 18.12.2019, a pre-sale agreement was signed and the completion of the transaction was expected to take place in 2020.

According to IFRS 5, the above company was classified as Held for Sale as at 31.12.2019. The Group valued the assets and liabilities at the lowest amount between their carrying amount and the fair value less cost to sell. From the aforementioned valuation there was no impact in the Income Statement.

Taking into account that the company did not comprise 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 "Other / Elimination Center" for operating segment disclosure purposes.

On 30.6.2020 the disposal was concluded and the consideration received amounted to € 10.5 million while a further contingent consideration of € 2.4 million is estimated to be received in the next 5 years under certain condition, and is recognised as fair value through profit and loss, while a loss of € 233 recognized in the "Gains less losses on financial transactions".

Non-performing loans portfolio

Loan Portfolio A: Non-performing loans with collaterals

During 2019, the Bank initiated the process for the sale of securitized non-performing loans, which included receivables from consumer loans, wholesale loans, shipping loans and mortgage loans.

With regards to the aforementioned portfolio, on 1.7.2020 the Bank proceeded to a binding agreement with Poseidon Financial Investor DAC for the sale of part of the portfolio, with a carrying amount of € 261,177 (Neptune) while the transaction was concluded on 17.7.2020. The consideration for the transferred portfolio, including costs and other liabilities, amounted to € 261,177, while at the same time a provision of € 25,000 was recognized by the Bank relating to the liability that the Bank estimates will occur from claims related to the sold loan portfolio.

The sale of the portfolio resulted in a profit of € 1,572.

The remaining portfolio (Neptune II) remains under "Assets held for sale" with an estimated carrying amount of € 133,763 since as at 30.9.2020 it meets the criteria to be classified as "Assets held for sale" according to IFRS 5 and the Bank expects that the sale will be concluded until 31.12.2020.

From the aforementioned portfolio an amount of € 131,522 (31.12.2019: € 392,259) is included in the operating segment "Corporate Banking" and an amount of € 2,241 (31.12.2019: € 16,859) is included in the operating segment "Retail" of note 25 "Operating Segments".

Loan Portfolio B: Securitised Non-performing loans

During 2019, the Bank initiated the process of the sale of a portfolio of securitized non-performing corporate loans.

The aforementioned portfolio was sold during the third quarter of 2020. The consideration of the transaction as determined after



the transaction costs amounted to € 9,358 while the result from the sale determined to loss of € 635. These loans amounting to € 9,618 as at 31.12.2019 were included in the operating segment "Corporate Banking" of note 25 "Operating Segment".

Loan Portfolio C: Non-performing corporate loans in Greece

During 2018, the Group initiated the process for the sale of a portfolio of Non-Performing corporate loans in Greece, which was partially completed in the same year.

The carrying amount of the remaining portfolio, for which the completion of disposal depends on certain conditions agreed with the buyer, as at 30.9.2020 amounted to € 12,258 (31.12.2019: € 12,952). This amount is included in the operating segment "Corporate banking", while these loans are classified within "Assets held for sale" as at 30.9.2020, since the provisions of IFRS 5 are met.

Properties of Alpha Bank S.A. and investment Properties of Alpha Leasing S.A.

In 2018, the Bank and Alpha Leasing S.A. initiated the process of disposing of a portfolio consisting of both investment property, own used property and assets obtained from auctions. During the year of 2019, the sale of a part of the real estate portfolio was completed for a total consideration of € 50,738 while a gain amounting to € 1,773 was recognized under "Other income" of the Income Statement. Within the nine month period of 2020, two of the remaining properties of the Bank were sold at a consideration of € 11,128, while a gain amounting to € 138 and a loss of € 11 were recognized under "Other income" and "Other expenses" of the Income Statement respectively. Furthermore, during the nine month period of 2020 three of the investment properties of Alpha Leasing S.A. were sold at a consideration of € 1,623, recognizing a gain of € 1 under "Other income" of the Income Statement. In addition four additional investment properties of carrying amount of € 1,185 were classified under "Assets held for sale".

The remaining properties as at 30.9.2020 amounting to € 2,639 did not meet the criteria to be classified as "Assets held for sale" according to IFRS 5 and were transferred to "Other assets". It is noted that the properties of Alpha Leasing S.A. (carrying amount € 1,282) are included in "Corporate Banking" operating segment of note 25 "Operating Segment".

Investment Property Alpha Investment Property Neas Erythreas A.E.

During the nine month period of 2020 Alpha Investment Property Neas Erythreas A.E. classified investment properties with a carrying amount of € 6,422 to "Assets held for sale", as the provisions set under IFRS 5 were met.

The Group valued the above mentioned assets at the lowest amount between the carrying amount and the fair value less cost to sell. From the aforementioned no impact in the income statement occurred.

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

Investment Properties ABC RE COM Pafos Ltd

The Group has initiated the process for the disposal of the investment properties of its subsidiary in Cyprus ABC RE COM Pafos Ltd and within 2019 it was assessed that the criteria of IFRS 5 were met. As a result, the properties were classified as "Asset held for sale" at the reporting date. The Group valued these investment properties at the lower between their carrying amount and their fair value less costs, which resulted in no impact. On 03.08.2020 the disposal of the aforementioned properties was concluded and the resulting gain of € 124 was recognized in the Income Statement.

The investment properties were included in sector "S. E. Europe" for operating segment disclosure purposes.

Fixed assets of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd

In October 2019, the Group subsidiaries Alpha Bank Cyprus and AGI-Cypre Ermis signed a long-term partnership agreement with DoValue S.p.A. in order to manage the Non-performing Exposures (NPEs) and Real Estate (REO) portfolio in Cyprus, valued at approximately € 3.2 billion (carrying amount before impairment). In the context of this agreement, doValue established a dedicated servicing company in Cyprus ("doValue Cyprus Ltd"), in which the the specific business of the subsidiaries, assets and



the employees of this business line of Alpha Bank Cyprus Ltd and AGI-Cypre Ermis Ltd will be transferred, in accordance with the applicable legislation. The transfer has been approved by the Commission for the Protection of Competition of the Republic of Cyprus. Therefore, in accordance with IFRS 5, fixed assets amounting to € 126 were classified as “Assets held for sale” as at 30.9.2020, without constituting a discontinued operation as they do not comprise a significant part of the Group’s business activities. The Group valued these assets at the lowest amount between the carrying amount and the fair value less costs to sell and no impairment resulted.

The fixed assets of the companies are included in the sector “S.E. Europe” for operating segment disclosure purposes

Other assets held for sale

Other assets held for sale amounting to € 2,151 (31.12.2019: € 2,238) include Group’s real estate properties. In addition, assets held for sale also include the Bank’s participation in “Forthnet S.A.” with a carrying amount of € 1 along and a bond with a carrying amount of € 135, issued by “Forthnet S.A.” for which their sale is expected to be completed during 2020. On 13.11.2020 the partial sale of Bank’s participation to Forthnet S.A., which corresponds to 5,30% of the company’s share capital, was completed, for a consideration of € 95. Following the transaction’s completion, the Bank currently holds shareholding participation of 0,27% to Forthnet S.A. Within the nine month period the participations of a total carrying amount of € 478 in V Telecom Investment S.C.A and V Telecom Investment General Partner S.A. which were previously held into securities measured at fair value to other comprehensive income were classified as Held for Sale, since the Bank signed on 10.6.2020 a pre-agreement for their sale which was completed on 6.10.2020. For the aforementioned participations the loss valuation reserve that has been recognized directly in the Equity amounted to € 3,495.

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 assesses at each financial statements reporting date, the actions undertaken and in cases that IFRS 5 criteria are met (listed in note 1.1.17 of the Consolidated Financial Statements as at 31.12.2019) the assets and liabilities that are directly associated to these cases, to be classified as held for sale.

The fair value of assets classified as “Assets held for sale” at each reporting date are calculated using the methods set out in note 1.2.7 of the consolidated financial statements as at 31.12.2019 and are classified at Level 3 of the fair value hierarchy, as the fair value measurement is largely based on unobservable inputs such as research data, assumptions and data that refer to comparable prices of assets with identical characteristics and therefore include a wide range of unobservable in the market data.

32. Corporate events

- ▶ On 7.1.2020, the disposal of the total shareholding of the Group’s subsidiary in AGI-Cypre Alaminos Ltd was completed for a consideration of € 4,686.
- ▶ On 22.1.2020, the Bank’s subsidiary Alpha Bank Cyprus Ltd established AGI-Cypre Property 45 Ltd for an amount of € 1, which was transferred on 28.2.2020 to the Bank’s subsidiary AGI-Cypre Ermis Ltd. Subsequently, on the same date, subsidiary AGI-Cypre Ermis Ltd proceeded with share capital increase through contribution in kind to AGI-Cypre Property 45 Ltd amounting to € 27,065.
- ▶ On 27.1.2020, the Bank’s subsidiary Alpha Group Investments Ltd proceeded with an increase of the share capital in cash of its subsidiary AEP GI I A.E., for the amount of € 300.
- ▶ On 29.1.2020 and 10.8.2020, the Bank’s subsidiary Alpha Group Investments Ltd participated proportionally by paying the amount of € 100 and € 500 respectively, following the advance payment of € 650 made on 18.12.2019, for the future share capital increase of the joint venture AEP Elaionas A.E.
- ▶ On 29.1.2020 the Bank’s subsidiary, Alpha Group Investments Ltd proceeded with the increase of the share capital in cash of its subsidiary AEP Irakliou A.E. for the amount of € 60.



- ▶ On 11.2.2020 the Bank completed the establishment of the branch in Luxembourg and on 19.6.2020 completed the transfer of London branch operations to the branch in Luxembourg.
- ▶ On 11.2.2020 the Group's subsidiary, AGI-BRE Participations 4 Ltd proceeded with the increase in share capital in cash of its subsidiary AGI-BRE Participations 4 EOOD for the amount of € 820.
- ▶ On 20.2.2020, the Bank's subsidiary AGI-Cypre Ermis Ltd transferred its subsidiaries, AGI-Cypre Property 34 Ltd, AGI-Cypre Property 36 Ltd, AGI-Cypre Property 37 Ltd, AGI-Cypre Property 43 Ltd and AGI-Cypre Property 44 Ltd to the Bank's subsidiary, Alpha Bank Cyprus Ltd.
- ▶ On 26.2.2020 the Bank's subsidiary, Alpha Group Investments Ltd proceeded with the increase in share capital in cash of its subsidiary Krigeo Holdings Ltd., for the amount of € 8,500.
- ▶ On 27.2.2020 the Bank's subsidiary Alpha Group Investments Ltd made an advance payment of € 6,000, for the future share capital increase in cash of its subsidiary Alpha Investment Property Livadias A.E. which completed on 8.5.2020 with the payment of the residual capital amounting to € 4.000.
- ▶ On 3.3.2020 the Bank's subsidiary Emporiki Development & Real Estate Management A.E. was renamed to Alpha Holdings S.M.S.A.
- ▶ On 9.3.2020 the Group's investment participation, Bluehouse Accession Property II, returned a capital of € 600 to the Group's subsidiary, Ionian Equity Participation Ltd.
- ▶ On 11.3.2020 the Bank proceeded with the establishment and on 19.3.2020 on the payment of share capital of the entities Reoco Orion X M.A.E., Reoco Galaxy II M.A.E. and Reoco Galaxy IV M.A.E., for an amount of € 50 each.
- ▶ On 13.3.2020 the Group's subsidiary, Krigeo Holdings Ltd, repurchased the entity AGI-BRE Participations 2 BG EOOD from the Bank's subsidiary Alpha Group Investments Ltd, for a consideration of € 0.001.
- ▶ On 13.3.2020 the Group's subsidiary, Ionian Equity Participations proceeded with the proportional participation with the first capital disbursement amounting to € 39 to the newly established private equity fund, SMERemedium Cap SCA SICAV-RAIF in Luxemburg. The approved commitment of the entity for the whole investment in the fund amounts to € 3,000.
- ▶ On 16.3.2020 the Bank's subsidiary, Alpha Group Investments Ltd made an advance payment of € 75, for the future share capital increase in cash of its subsidiary Alpha Investment Property Neas Erythraias S.A. which was completed on 5.6.2020 through the payment of the remaining amount of € 3,425.
- ▶ On 23.3.2020 the Bank proceeded with the share capital increase of its subsidiary AGI-Cypre Ermis Ltd by paying € 65,000 in cash.
- ▶ The United Kingdom voted to leave the European Union in June 2016. The formal withdrawal process and the negotiations between the EU and the UK Government began in 2017. On January 29, 2020 the European Parliament ratified the withdrawal agreement of the UK from the EU. The transition period was set from February 1, 2020 to December 31, 2020.
- ▶ On 13.4.2020 the Group's subsidiary Krigeo Holdings Ltd proceeded with the increase in share capital with cash in its subsidiary AGI-BRE Participations 2BG EOOD, for the amount of € 8,500.
- ▶ On 30.4.2020, in accordance with the requirements of article 10 of Law 3156/2003, the Bank completed the procedures for the securitization of receivables from loans or/and consumer, mortgage and corporate credits and transferred them to Special Purpose Entities, under the Law 3156/2003, which are located in the Republic of Ireland. The aforementioned transaction is an integral part of the Project Galaxy as this was announced by the Bank in November 2019 in the context of its three years Strategic Plan.
- ▶ On 7.5.2020 the Bank proceeded with a share capital increase with cash in its subsidiary Alpha Group Investments Ltd paying an amount of € 10,000.
- ▶ On 8.5.2020 the Group's subsidiary, AIP Industrial Assets Rog S.M.S.A. was renamed to Alpha Investment Property Residential Assets M.A.E.
- ▶ On 9.5.2020 the Group's subsidiary, AIP Attica Commercial Assets S.M.S.A. was renamed to Alpha Investment Property Commercial Assets Urban Centers M.A.E.



- ▶ On 12.5.2020 the Group's subsidiary, AIP Industrial Assets Athens S.M.S.A. was renamed to AIP Industrial Assets S.M.S.A.
- ▶ On 18.5.2020 the Bank's subsidiary, Alpha Bank Cyprus Ltd established AGI-Cypre Property 40 Ltd for an amount of € 1.
- ▶ On 28.5.2020 completed the share capital increase in cash of the Bank's subsidiary, AEP Attikis S.A. for the amount of € 299 which had been paid in advance on 30.10.2019 from the shareholder Alpha Group Investments Ltd.
- ▶ On 2.6.2020 the Bank participated proportionally to share capital increase by paying in cash the amount of € 102 to the joint venture Alpha TANE0 A.K.E.S.
- ▶ On 5.6.2020 and on 29.6.2020 the Bank proceeded with the share capital increase in cash to its subsidiary Alpha Group Investments Ltd for an amount of € 3,500 and € 3,500 respectively
- ▶ On 11.6.2020 the liquidation process of Cordia Residence Srl completed with the deletion from the business register of Romania.
- ▶ On 19.6.2020 the Bank proceeded with the establishment of the subsidiary Alpha International Holding S.M.S.A. and on 15.7.2020 and 20.11.2020 the Bank proceeded to the initial share capital contribution in cash of total amount € 1.280.000.
- ▶ On 19.6.2020, the Bank's subsidiary AGI-Cypre Ermis Ltd proceeded with share capital increase through contribution in kind to the subsidiary AGI-Cypre Property 33 Ltd for an amount of € 514.
- ▶ On 19.6.2020, the Bank's subsidiary Alpha Bank Cyprus Ltd transferred its subsidiaries AGI-Cypre Property 34 Ltd and AGI-Cypre Property 37 Ltd ,to the Bank's subsidiary AGI-Cypre Ermis Ltd and subsequently, on the same date, the latter proceeded with share capital increase through contribution in kind to AGI-Cypre Property 34 Ltd and AGI-Cypre Property 37 Ltd for an amount of € 606 and € 340 respectively.
- ▶ On 19.6.2020 the Bank's subsidiary AGI-Cypre Ermis Ltd proceeded with share capital increase through contribution in kind to its subsidiary, AGI-Cypre P&F Pafos Ltd, for an amount of € 579.
- ▶ On 23.6.2020 the Bank's subsidiary Alpha Bank Cyprus Ltd established ABC RE RES Ammochostos Ltd and ABC RE RES Pafos Ltd for an amount of € 1 each.
- ▶ On 24.6.2020 the subsidiary company of the Group, Alpha S.A. Investment Holdings, covered its proportion by paying an amount of € 13, as an advance against a future share capital increase of its investment in the company of Theta Microelectronics Inc.
- ▶ On 26.6.2020 part of the performing and non-performing loans portfolio was transferred from Alpha Bank Cyprus Ltd to the Bank's subsidiary Alpha Credit Acquisition Company Limited, for a consideration of € 307,000.
- ▶ On 29.6.2020 the Bank's subsidiary, Alpha Group Investments Ltd proceeded with share capital increase in cash to its subsidiaries Alpha Investment Property Neas Kifissias A.E. and Alpha Investment Property Kallirois A.E., by paying an amount of € 2,500 and € 1,000 respectively
- ▶ On 29.6.2020 the Bank proceeded with share capital increase by paying in cash the amount of € 6,000 to the associate Cepal Holdings S.A.
- ▶ On 30.6.2020 the Bank proceeded with share capital increase by paying in cash the amount of € 85,000 to its subsidiary AGI-Cypre Ermis Ltd.
- ▶ On 30.6.2020 the Group's subsidiary AGI-BRE Participations 3 E.O.O.D sale completed for a received consideration of € 10,500.
- ▶ On 3.7.2020 the Group's subsidiaries, Alpha Group Real Estate Ltd and Emporiki Venture Capital Developed Markets Ltd, established the Sapava Ltd company for an amount of € 1.
- ▶ On 6.7.2020 the Bank's subsidiary, Alpha Group Investments Ltd, participated in the establishment of the entity Perigenis Commercial Assets A.E. and on 2.9.2020 covered its share in the founding capital of the company by paying an amount of € 15,399
- ▶ On 8.7.2020 the Group's associate, Astakos Terminal A.E., proceeded with share capital increase by paying in cash the amount of € 236 to its subsidiary NAVIPE S.A.



- ▶ On 8.7.2020 the Bank's associate, APE Investment Property A.E., proceeded with share capital increase by paying in cash the amount of € 78 to its subsidiary, SYMET S.A.
- ▶ On 15.7.2020 the Bank proceeded with the partially payment of € 320,000 of the founding share capital of the subsidiary Alpha International Holding M.A.E.
- ▶ On 17.7.2020 Alpha Bank Romania and Alpha Finance Romania signed an agreement for the absorption of the business activity of Alpha Finance Romania by Alpha Bank Romania, for a consideration of € 135. The transfer of business activity was completed on 5.10.2020.
- ▶ On 17.7.2020, the Bank completed the disposal of a pool of Greek SME Non-Performing Loans mainly secured by real estate assets ("Portfolio Neptune"), of a total carrying amount before impairment of € 1.1 billion.
- ▶ On 22.7.2020, the Bank acquired the full share capital and control of Cepal Holdings S.A., by exercising on 1.7.2020 the put option in Bank's favor in accordance with the terms of change of shareholders agreement.
- ▶ On 22.7.2020, the Bank's subsidiary Cepal Holdings A.E. following its acquisition by the Bank, increased the share capital of its subsidiary Cepal Hellas S.M.S.A. by € 4,700.
- ▶ On 27.7.2020 the Bank paid in cash € 485 that related to its share in the completion of the share capital increase of the subsidiary APE Fixed Assets S.A. following the advanced payment of € 100 made on 30.10.2019.
- ▶ On 29.7.2020, the Bank's subsidiary Alpha Bank Cyprus Ltd proceeded with share capital increase with an in kind contribution to its subsidiary ABC RE P&F Limassol Ltd for an amount € 354.
- ▶ On 30.7.2020, the Bank's subsidiary Alpha Bank Cyprus Ltd established AGI-Cypre Property 46 Ltd for an amount of € 1.
- ▶ On 31.7.2020 the Bank's subsidiary Alpha Bank Cyprus Ltd transferred its subsidiary AGI-Cypre Property 42 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd and on the same date the latter proceeded in share capital increase with in kind contribution of € 458.
- ▶ On 31.7.2020 the Bank's subsidiary AGI-Cypre Ermis Ltd,proceeded with share capital increase with an in kind contribution to its subsidiary AGI-Cypre P&F Nicosia Ltd for an amount € 528.
- ▶ On 5.8.2020 the disposal of the total shares of the Group's subsidiary ABC-RE L1 Ltd was completed, for a purchase price € 950.
- ▶ On 31.8.2020 the Bank's subsidiary, AGI-Cypre Ermis Ltd, proceeded with share capital increase with an in kind to its subsidiary AGI-Cypre Property 10 Ltd for an amount of € 890.
- ▶ On 2.9.2020 the Bank proceeded with share capital increase in cash to its subsidiary, Alpha Group Investments Ltd, by paying an amount of € 15,399
- ▶ On 10.9.2020 the Bank participated proportionally by paying in cash the amount of € 408 for the share capital increase of the joint venture Alpha TANE0 A.K.E.S.
- ▶ On 18.9.2020 the Bank's subsidiary, Alpha Bank Cyprus Ltd transferred its subsidiaries, AGI-Cypre Property 36 Ltd and AGI-Cypre Property 44 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd. Subsequently, on the same date, the latter proceeded with share capital increase through contribution in kind to AGI-Cypre Property 36 Ltd, AGI-Cypre Property 44 Ltd and AGI-Cypre P&F Pafos Ltd, for an amount of € 550, € 1,328 and € 162 respectively.
- ▶ On 24.9.2020 the Bank's participation company, Visa Inc., through Class C preferred shares, released a value of \$ 4,216 to its Class C shareholders by issuing Class A preferred shares and adjusting the conversion ratio of existing Class C preferred shares to common Class A shares traded on the NYSE. As a result, the Bank acquired an additional participation in the company through Class A preferred shares, valued to € 17,294 (24.9.2020). At the same time, the value of the existing Class C preferred shares held by the Bank was adjusted from € 34,052 (31.8.2020) to € 16,101 (24.9.2020).
- ▶ On 29.9.2020 the Bank's subsidiary, Alpha Bank Cyprus Ltd transferred its subsidiary, AGI-Cypre Property 43 Ltd to the Bank's subsidiary AGI-Cypre Ermis Ltd. Subsequently, on the same date, the latter proceeded with share capital increase through contribution in kind to AGI-Cypre Property 43 Ltd, for an amount of € 550.



- ▶ On 30.9.2020, the Group's subsidiary, AGI-RRE Cleopatra Srl proceeded with an increase of the share capital in cash of its subsidiary, TH Top Hotels Srl for the amount of € 162.
- ▶ On 6.10.2020 the disposal of the Bank's participation in V Telecom Investment S.C.A and V Telecom Investment General Partner S.A. based in Luxemburg was completed for a consideration of € 239 each.
- ▶ On 21.10.2020 the Bank's subsidiary, Alpha Bank Cyprus Ltd established AGI-Cypre Property 47 Ltd and AGI-Cypre Property 48 Ltd for an amount of € 1 each.
- ▶ On 29.10.2020 the Bank's subsidiary Alpha Credit Acquisition Company Ltd established Alpha Credit Property 1 Ltd for an amount of € 1.
- ▶ On 6.11.2020, the disposal of the total shareholding of the Group's subsidiary in AGI-Cypre Property 3 Ltd was completed for a consideration of € 380.
- ▶ On 11.11.2020 the sale of Bank's participation to Mastercard Incorporated was completed, for a consideration of \$ 50,226.
- ▶ On 13.11.2020 the partial sale of Bank's participation to Forthnet S.A., which corresponds to 5,30% of the company's share capital, was completed, for a consideration of € 95. Following the transaction's completion, the Bank currently holds shareholding participation of 0,27% to Forthnet S.A.

33. Restatement of financial statements

During the nine month period of 2020, the Group amended the presentation of Losses on disposal of fixed assets. Specifically, the said amounts, that were previously reported within "General Administrative Expenses" of the Consolidated Income Statement, are now reported within "Other Expenses". The purpose of the amendment is the appropriate presentation of these amounts due to their nature in the results, by taking into consideration that the disposal of the fixed assets is an ancillary activity and not a core operating activity, while at the same time it is consistent with the presentation of Impairment losses, which are also included to "Other Expenses".

Furthermore, within the second quarter the Group amended the presentation of the income and expenses accounts related to operating risk events. Specifically, the said amounts were previously reported within "General administrative expenses" of the Income Statement and are now reported within "Other expenses". The purpose of the amendment is the appropriate presentation of these amounts due to their nature in the results, by taking into consideration that the respective provisions regarding operating risk are classified in "Other expenses".

As a result of the aforementioned amendment, certain amounts of the Consolidated Income Statement of the previous financial year have been restated, without differentiating the results of each period as shown in the tables that follow:

	From 1 January to				
	31.3.2020	31.12.2019	30.9.2019	30.6.2019	31.3.2019
General administrative expenses	98	8,559	5,418	2,033	415
Other expenses	(98)	(8,559)	(5,418)	(2,033)	(415)
Total impact in income statement	-	-	-	-	-

	1.1 - 31.3.2020	1.10 - 31.12.2019	1.7 - 30.9.2019	1.4 - 30.6.2019	1.1 - 31.3.2019
General administrative expenses	98	3,141	3,385	1,618	415
Other expenses	(98)	(3,141)	(3,385)	(1,618)	(415)
Total impact in income statement	-	-	-	-	-

Additionally, in regards to the reclassification of the Bank's participation to the joint venture APE Commercial Property, as reported in detail in the Note 32 "Asset held for Sale", the Group assessed the impact to the consolidated amounts and has been considered insignificant in relation to the total Assets of the Consolidated Balance Sheet, while no impact in the consolidated Income Statement and the opening consolidated equity of the comparative period occurred, given the fact that



the participation has been valued at the lowest amount between the carrying amount and the recoverable amount. Therefore, no retrospective restatement of the comparative periods was performed.

In case of a retrospective restatement, the consolidated Balance Sheet as of 1.1.2019 and 31.12.2019, would have the following impact:

	31.12.2019	1.1.2019
Investments in associates and joint ventures	3,917	3,917
Assets held for sale	(3,917)	(3,917)
Total impact in assets	-	-

Respectively, the impact on the Consolidated Income Statement for all quarters of 2019 would be the following:

	From 1 January to			
	31.12.2019	30.9.2019	30.6.2019	31.3.2019
Gains less losses on financial transactions	17	7	5	3
Share of profit / (loss) of associates and joint ventures	(17)	(7)	(5)	(3)
Total impact in income statement	-	-	-	-

	1.10 - 31.12.2019	1.7 - 30.9.2019	1.4 - 30.6.2019	1.1 - 31.3.2019
Gains less losses on financial transactions	10	2	2	3
Share of profit / (loss) of associates and joint ventures	(10)	(2)	(2)	(3)
Total impact in income statement	-	-	-	-

34. Strategic Plan 2020 - 2022

On November 2019, the Bank announced the framework of the strategic plan 2020-2022, the main priority of which is the acceleration of the procedures regarding its Balance Sheet's resolution. The strategic plan includes: (a) the accomplishment of a securitization transaction on receivables from non-performing loans amounting up to € 11 billion (Galaxy transaction), b) the inclusion of the securitization transaction under the program "Hercules Asset Protection Scheme (HAPS)" of the Law 4649/2019 for the limitation of the impact of the securitization transaction on the Bank's capital adequacy and the subsequent sale of the portfolio, c) the transfer of the non-performing exposures servicing to "Cepal", which is a licensed entity for the management of receivables from loans in accordance with Law 4354/2015 and subsequently the sale of Cepal's shares to a third investor and d) the hive down of the banking activity sector of the Bank.

- The Bank completed the procedures for the securitization of non-performing loans, as described in note 13, and on 6.8.2020 announced the submission of application under the Hercules Asset Protection Scheme for the Orion and Galaxy II securitizations of Galaxy transaction under Law 4649/2019. The application relates to the provision of a guarantee by the Greek State on the senior notes of an amount up to € 3.04 billion. In the same context, on 22.10.2020 the Bank submitted an application for the third securitization Galaxy IV. The application relates to the provision of a guarantee by the Greek State on the senior notes of Galaxy IV securitization of an amount up to € 650 million.
- Additionally, the Bank announced on 28.9.2020, the initiation of the transfer process (carve out) of its NPE management activity to Cepal, with the objective of reducing Non Performing Exposures (NPEs). The transfer of the NPE Management Activity is expected to be completed by the end of November 2020.
- The Board of Directors of 1.6.2020, resolved to commence the demerger process through the spin-off (hive down) of the banking activity sector by the establishment of a new entity, in accordance with the provisions of article 16 of Law 2515/1997, Article 57 par. 3 and articles 59 to 74 of Law 4601/2019.

In the context of the hive down, the banking activity sector of Alpha Bank (Demerged Entity) will be contributed to the new entity, which will be licensed as a credit institution and will be a 100% subsidiary of the Demerged Entity. The Demerged Entity will retain activities, assets and liabilities, which are not related to the core banking activity and upon the completion of the demerger process, will cease to be a credit institution while its shares will remain listed on Athens Stock Exchange.



Additionally, according to the aforementioned resolution, June 30th 2020 has been set as the transformation balance sheet date of the hive down. All actions taken by the Demerged Entity, following the transformation balance sheet date and are related to the sector of banking activity contributed, are considered to be performed on behalf of the new company.

All rights pertained by the HFSF will be maintained after the completion of the hive down.

The completion of the demerger is subject to the mandatory approvals required by Law from the Board of Directors and General Assembly of Alpha Bank's shareholders, along with the required approvals by the competent regulatory Authorities, as are in force.

The action plan of demerger through the spin-off (hive down) of the banking activity sector and the establishment of a new entity was approved during the Board of Directors meeting of 15.9.2020.

35. Events after the balance sheet date

On 2.11.2020 it was announced that, in the context of the bidding process for the Galaxy Transaction, two (2) binding offers from international investors were received, while on 23.11.2020 it was announced that the Board of Directors of the Bank, at its meeting of 20.11.2020, assessed these binding offers and declared Davidson Kempner European Partners LLP as the preferred bidder. The Bank, with its financial and legal advisors, embarks into negotiations with Davidson Kempner targeting the finalization of the agreement on Project Galaxy by year-end and, pursuant to all applicable laws and its policies, will inform the investors promptly on its decisions on the said transaction.

Athens, 25 November 2020

THE CHAIRMAN
OF THE BOARD OF DIRECTORS

VASILEIOS T. RAPANOS
ID. No. AI 666242

THE CHIEF EXECUTIVE OFFICER

VASSILIOS E. PSALTIS
ID No AI 666591

THE GENERAL MANAGER
AND CHIEF FINANCIAL OFFICER

LAZAROS A. PAPAGARYFALLOU
ID No AK 093634

THE ACCOUNTING
AND TAX MANAGER

MARIANA D. ANTONIOU
ID No X 694507