

Annual Financial Report

For the year ended 31 December 2025

The information contained in this Annual Financial Report, has been translated from the original Annual Financial Report that has been prepared in the Greek language.
In the case of differences between the original and the translated Annual Financial Report, the Greek language Annual Financial Report prevails over this document.

TABLE OF CONTENTS

Annual Financial Report		
1. Ethniki Asfalistiki on a page		03
2. Key highlights		04
3. Statement of the Chairman of the Board		05
1. Chief Executive Officer's Report		06
5. Our Business Model		09
6. Our Strategy		10
7. Financial Review		11
7.1	Chief Financial Officer's report	11
7.2	Operating performance	12
7.3	Investment Portfolio & Income	17
7.4	Balance sheet review	19
7.5	IFRS Equity and Solvency Capital	20
7.6	Group structure	21
8. Our Risks & Risk Management		22
9. Board Viability Statement		25
10.Sustainability Statement		25
Independent Auditors' Reports		
Report on the audit of the financial statements		27
Report on Other Legal and Regulatory Requirements		31
Annual Financial Statements		
Statement of Total Comprehensive Income		35
Statement of Financial Position		37
Statement of Changes in Equity		38
Statement of Cash Flows		39
Notes on the Company's Annual Financial Statements		40



1. Ethniki Asfalistiki on a Page

A leading force in the insurance sector with a presence of 135 years

Established in 1891, Ethniki Asfalistiki is the insurance Company with the longest-standing history in Greece and a leader in the country’s insurance industry. It has established a strong reputation by consistently delivering on its promise towards the environment, people, and communities alike.

Remaining faithful to its values and its human-centered orientation, Ethniki Asfalistiki constantly improves its enterprise architecture, aiming to offer relevant and high-quality services to its customers.

Our vision is to be the leading *insurer, always standing by our customers, redefining insurance with innovation, empathy, and simplicity, while building a sustainable future.*



Our Mission

To support **people** and **businesses** by offering simple, innovative & reliable solutions to protect *what matters most to them.*



Our values

- 

Integrity & Reliability

We **act ethically, responsibly** and **transparently** with clients, partners and employees.
- 

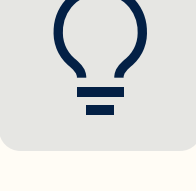
Customer Centricity

We walk **alongside our customers - listening, guiding, and delivering** with care in every moment that matters.
- 

Simplicity & Efficiency

We make insurance **clear and accessible - removing complexity** so people feel in control. We are **mindful of Ethniki's resources** and we use them responsibly.
- 

Performance & Excellence

We set **high standards**, measure what matters, and **reward excellence - working collaboratively** with teams and partners to deliver meaningful impact.
- 

Innovation

We **constantly challenge the status quo, embracing new technologies and ways of working** to strengthen our offerings and capabilities.
- 1

Ownership & Accountability

We are **committed to delivering our promises** and owning the outcomes of our efforts.



2. Key Highlights

2025 was marked by disciplined growth, with a focus on cost reduction and efficient capital management. The business increased its profitability, closing the year with a strong capital base.

Financial

€835 million

(2024: €850 million)

Gross Written Premium

€44.5 million

(2024: €26.2 million)

Adjusted operating result ¹

€48.0 million

(2024: €14.8 million)

IFRS profit before tax

3%

(2024: 2.9%)

Investment portfolio return

€679.3 million

(2024: €670.5 million)

Store of future profit ²

13.4%

(2024: 14.8%)

Expense Ratio ³

177%

(2024: 188%)

Solvency ratio with transitional measures

8.4%

(2024: 3.5%)

Adjusted Return on Equity (Adjusted ROE) ⁴

€521 million

(2024: €559 million)

Eligible own funds for SCR

€132 million

(2024: €123 million)

Direct, indirect taxes & social contributions paid

Non Financial

+6%

Customer net growth

€666 εκατ.

(2024: €588 million)

Responsible investments ⁵

46%

(2024: 43%)

Women in supervisory positions

785,383 tCO₂eq

(2024: 1,066,736 tCO₂eq)

Carbon footprint ⁶

- ¹ Profit before tax, adjusted for non-operating and other notable items
- ² Stock of future profit is the addition of the (CSM - Contractual Service Margin) and the risk adjustment (RA) and represents the future profit recognised in the statement of financial position to unwind into profit over time
- ³ The expense ratio reflects the measure of operating efficiency calculated as the ratio of total expenses (operating and non-operating) to total GWP
- ⁴ It is calculated as the adjusted operating result (adjusted for non-operating and other notable items) divided by the average shareholders' equity, adjusted to exclude subordinated debt
- ⁵ Responsible investment refers to investment strategies that explicitly consider ESG factors in the decision-making process, with the ultimate goal of increasing the value proposition of all our stakeholders over the long run
- ⁶ Being composed of Scope1 and Scope 2 location-based GHG emissions, categories 1-14 from Scope 3, as well as category 15 (financed-associated emissions) from Scope 3



3. Statement of the Chairman of the Board



George Kotsalos

Chairman

“With 135 years of heritage, a strong brand, trusted relationships, and a refreshed leadership team, we are well positioned to strengthen the business and create lasting value for our customers, partners, and shareholder”.

It is with great pride that I joined the Board of Ethniki Asfalistiki and assumed my role as Chair in December 2025. I am truly privileged to serve an institution with such a rich heritage and to work alongside with colleagues of exceptional talent.

Under the leadership of my predecessor, Athanasios Zarkalis—whom I would like to thank—the Company strengthened its profitability, consolidated its customer-centric focus, and reinforced its position in the market. The transformation achieved during his tenure was truly pivotal during a period of significant change.

I joined Ethniki Asfalistiki because I firmly believe in the Company’s potential to deliver even stronger performance, and nothing since my arrival has changed that conviction.

Ethniki is built on strong foundations: a clear and resilient business model, a solid market position, and one of the most recognisable brands in Greece, serving more than 1.9 million customers across a diverse portfolio. These strengths provide a powerful platform for driving the next phase of growth and value creation.

Building on that forward momentum, the Board and I will continue to closely partner with our CEO and his management team, who are accelerating the execution of our strategy, with discipline and confidence.

Beginning of a new era

My arrival coincided with the beginning of a new chapter for Ethniki Asfalistiki, marked by the announcement of the acquisition of 100% of the Company’s shares by Piraeus Bank in November. By joining forces with a leading financial group, we are creating significant new opportunities for growth and enhancing our ability to deliver even greater value to all our stakeholders. This acquisition reinforces Ethniki’s position as a vital and trusted partner, while supporting long-term value creation.

At the same time, it represents a strong vote of confidence in the resilience of our operating model, the quality of our people, and the way we serve our customers. It reflects not only what we have achieved to date but also the potential ahead of us as we embark on this new phase of our journey.

Highlighting our long-standing history

This June will mark the 135th anniversary since we first opened our doors to customers in 1891, making Ethniki Asfalistiki the first and longer-standing Company in Greece. Over these many decades, we have served millions of customers, continually evolving our products, services, and capabilities to meet their changing needs and expectations.

On reaching this significant milestone, it is fitting to reflect on the important role we have played in supporting Greece’s economic and social development throughout our history. Our ambition remains steadfast: to continue contributing positively to the country’s economy and society, while creating enduring value for our customers, partners, and employees for many years to come.

Business Performance

The 2025 results reflect the hard work of the past two years, which led to the Company’s return to profitability and strengthened its resilience. We achieved profit before tax of €48 million, while the Solvency II Ratio reached 177%, confirming the strength of our balance sheet. This positive momentum is supported by disciplined pricing, prudent risk selection, and effective claims management.

Customers

Our customers remain at the heart of everything we do. It is our fundamental purpose to understand their needs and serve them seamlessly and efficiently. During the year, we welcomed more than 100,000 new customers, reaffirming the trust placed in Ethniki Asfalistiki and strengthening our role in the market.

As customer expectations continue to evolve, demanding greater speed and security, we intensified our efforts during the year to advance our digital capabilities. At the same time, we systematically invest in digital transformation and in leveraging data and technology, with the aim of delivering a superior customer experience and drive higher productivity.

Sustainability

Our long-term success is inextricably linked to the principles of Sustainable Development that guide our strategic decisions.

During 2025, we achieved a substantial improvement in our environmental footprint and strengthened sustainability practices across all aspects of our operations.

At the same time, we remained committed to fostering inclusion and resilience within our organisation. We continued to build a healthy, engaging, and inclusive workplace that attracts, develops, and retains top talent, reinforcing the foundations needed for long-term sustainable growth.

Looking ahead

As we look to the year ahead, our focus remains firmly on delivering excellence for our customers and sustained value for our shareholder. While the external environment remains uncertain and further challenges lie ahead, I am confident that we have all the building blocks in place to achieve our targets.

On behalf of the Board, I would like to thank all our colleagues across Ethniki for their hard work, dedication and their delivery throughout the year. I look forward to working alongside you in the year ahead.

Sincerely,

George Kotsalos
Chairman of Ethniki Asfalistiki



4. Chief Executive Officer’s Report



Dimitrios Mazarakis
Chief Executive Officer

“A new era of growth and confidence is heralded for Ethniki Asfalistikí, underpinned by the strength and momentum of the Piraeus Group”.

A new era of stability and value creation

2025 marked a significant milestone for Ethniki Asfalistikí, as it signifies the successful completion of the first cycle of our strategic transformation and our transition to the next phase, underpinned by a more modern, efficient, and agile operating model. The transformation achieved over the recent years not only has enhanced our performance, but has also strengthened the quality, predictability, and resilience of our business model. At the same time, our integration into the Piraeus Bank Group ushers in a new period of stability, growth prospects, and meaningful value creation for all stakeholders.

Our integration into the Piraeus Group ecosystem creates significant opportunities to accelerate growth through the realisation of synergies, the expansion of distribution channels, and the strengthening of our customer base. At the same time, it reinforces our strategic direction towards more sustainable, responsible, and long-term profitable growth, further solidifying our position as a leading force in the insurance market.

The Greek insurance market continues to be characterised by significant growth potential, driven by low insurance penetration and a substantial protection gap. Against this backdrop, Ethniki Asfalistikí enters its new phase stronger than ever, with a clear strategic direction, enhanced execution capabilities, and improved operational efficiency.

Over the last years, we have consistently invested in the modernisation of our infrastructure, the enhancement of our sales networks, and the improvement of the experience of our customers and partners, while also strengthening our investment function and further developing our risk management framework. In parallel, we placed particular emphasis on the development of our human capital and the cultivation of a performance-driven and accountable culture. These strategic initiatives form a strong foundation for the next phase of our growth.

2025: Strong performance and strategic progress

In 2025, the strength and momentum of our strategy was reaffirmed. Operating in an environment of heightened demands and increased complexity, not only did we exceed our targets, but also strengthened our operational discipline and institutional standing.

Our financial performance reflects a meaningful improvement in profitability and efficiency. The Combined Ratio stood at 99.3%, while the ratio of total expenses to gross written premiums decreased to 13.4%, with total expenses remaining well below budget. At the same time, investment yield increased to 3.0%, and profit before tax amounted to €48 million, underscoring the steady progress achieved in the quality of our results and the efficient deployment of capital.

At a commercial level, the Company demonstrated resilience and adaptability. Despite temporary pressures in the bancassurance channel, associated with the transition to the new shareholder structure,

overall performance was supported by the strong momentum of the other distribution channels and improved productivity within the corporate network. This development confirms the strength and balance of our business model, as well as the importance of further diversifying our distribution channels.

2025 was also marked by key strategic decisions that strengthened the Company's long-term positioning. The divestment from operations in Cyprus and Romania sharpened our strategic focus on the Greek market, optimising capital allocation and reducing organisational complexity. At the same time, the agreement with the Syggelidis Group for the acquisition of a majority stake in the Elysée insurance brokerage companies strengthens our position in the motor line of business, diversifies our revenue streams, and establishes the foundations for the development of a broader mobility ecosystem.

At the same time, we further strengthened the governance and strategy execution framework, enhancing coordination, transparency, and accountability across the organisation. The integration of ESG principles into our operations and decision-making processes has now become an integral component of our strategy, reinforcing the link between growth, sustainability, and long-term value creation for all stakeholders.

Strategy 2026–2030: Acceleration and Disciplined Growth

Our business strategy for the 2026–2030 period focuses on sustainable value creation through a balanced approach to growth, profitability, and resilience. In an international and regional environment that continues to be characterised by heightened geopolitical tensions and macroeconomic uncertainty— affecting markets and the broader business climate—we incorporate active risk and volatility management mechanisms into our strategy. Our approach is founded on clear principles: disciplined growth driven by capital returns, proactive management of volatility, and the ongoing strengthening of our capital base. We continuously monitor developments and systematically assess their potential impact on our operations, investment portfolio, and overall risk profile.

Our key strategic priorities comprise:

- further strengthening our commercial momentum and enhancing our multi-channel distribution,
- the continuous improvement of the quality and predictability of our results,
- the structural enhancement of profitability, and
- active capital management to reinforce balance sheet resilience.

Our strong capital base and high liquidity constitute core pillars of our strategy and key factors of resilience, enabling us to support growth in a disciplined manner and to effectively absorb periods of volatility. Combined with prudent investment and risk management, this approach ensures strategic flexibility and establishes a solid foundation for sustainable profitability.

The implementation of our strategy is supported by cross-cutting priorities, including a customer-centric approach, operational efficiency, and the development of our people. At the same time, we continue to embed ESG principles across the full scope of our activities, strengthening the link between growth, sustainability, transparency, and responsible governance.

In the area of technology, we are investing in a modern, platform-based architecture and in the adoption of artificial intelligence, which is being progressively embedded into critical functions to enhance efficiency and the customer experience, as well as to improve the speed and quality of decision-making.

Overall, our strategy establishes a clear and disciplined framework that enables Ethniki Asfalistikí to fully leverage the opportunities of its new operating environment and to further strengthen its role as a long-term value creator within the Piraeus Group.



Looking Ahead

The year ahead lays the foundations for a new phase of growth for Ethniki Asfalistiki. With enhanced profitability, a strong capital base, and a clear strategic direction, the Company is well positioned to deliver sustainable and responsible growth, fully leveraging the opportunities offered by its new operating environment.

With the support of the Board of Directors and the Piraeus Group, we move forward with confidence into the next phase, further strengthening our market position and our contribution to the Greek economy.

I would like to extend my sincere thanks to the members of the Board of Directors for their strategic guidance, as well as to the executive management team and all our employees for their commitment, professionalism, and dedication. I would also like to thank the Piraeus Group for its trust and continued support.

With clear direction, disciplined execution, and a shared vision, we continue to strengthen our competitive position and to create value with consistency, stability, and a long-term perspective.

Sincerely,

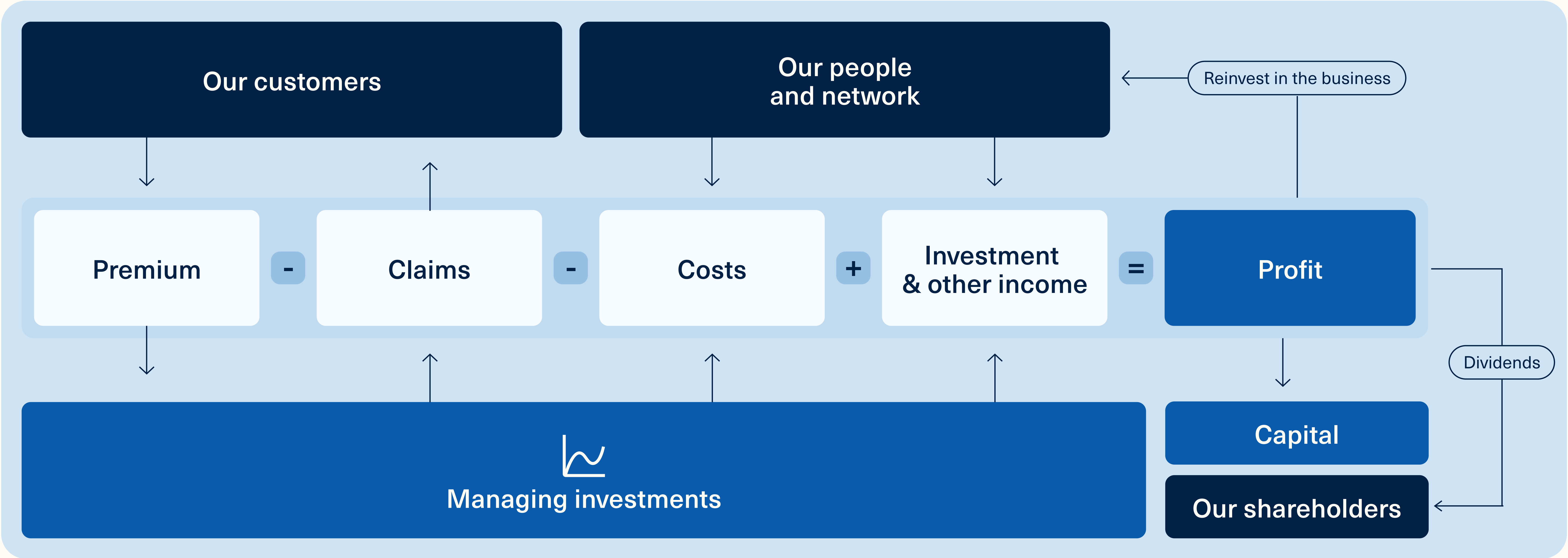
Dimitrios Mazarakis
CEO of Ethniki Asfalistiki



5. Our Business Model

How our business model creates long-term value for all our stakeholders

Our business model provides our customers with financial security and service excellence, our colleagues with jobs and benefits and supports the communities in which we operate, while aiming to deliver higher and sustainable returns for our shareholder.



What we do

Serving our customers

We provide a wide range of insurance products tailored to meet the unique needs of our customers. With a strong focus on quality, reliability and customer satisfaction, the comprehensive coverage options encompass a series of products and services, from protecting valuable assets to safeguarding health and well-being, for both individuals and businesses.

We offer our insurance products and services through a multi-channel approach that covers tied agents, independent brokers, bancassurance, and direct channel including online sales.

Generating income through premium collections

Our diversified model enables us to generate premiums from a range of products across retail personal and commercial lines. Our customers pay us an agreed premium to insure themselves against specific risks.



Claims management

Our efficient claims management is backed by a culture of continuous improvement, proactive engagement, great customer service, and decades of experience. We engage closely with our customers throughout the claims process, working with our partners, to ensure our customers are supported and receive a fair outcome in a timely manner.

Cost control

We are focused on driving product profitability through disciplined cost management and improving efficiency through greater use of digital processes across the business.

Investing premiums

We generate further income by prudently investing the premiums we collect. Our investment strategy is focused on capital preservation and low volatility of returns relative to liabilities. We hold a prudent level of liquidity and our investment portfolio has a high-quality credit profile. We seek to align our investment strategy with our sustainability strategy.

Creating value for our stakeholders

The difference between our revenues and our paid and expected claims and operating costs drives our profitability. Most of our profits are paid out in dividends, with a proportion held back to continue investing in our capabilities and business opportunities, and to support growth.

The drivers of our success

Customer focus

Our customers are our business. We build long-term relationships across all stages of their lives, addressing their needs and leveraging our expertise and capabilities to deliver high-quality products, services, and trusted advice.

Unique Company culture

A great culture goes a long way towards building long-term commercial success. Our unique culture encourages openness and equality, so that our colleagues are empowered to do the right thing for customers. It provides also a supportive environment that allows our people to develop and grow. A culture of giving and a sense of responsibility for our communities is shared across the Company.

Risk management

We underwrite carefully selected risks and share a proportion of that risk with our reinsurers. The use of reinsurance is a key feature of our business model and success. Our partnerships with reinsurers are underpinned by track record of strong underwriting results and good risk management. This ensures that we have further protection from losses as well as earning profit commission when the business generates overall profits. Sharing risk also allows us to hold less capital, whilst ensuring protection from losses, thus supporting our commitment to strong shareholder returns.

Balanced investment portfolio

The premiums we collect from customers are invested in a diversified investment portfolio designed to meet our long-term claims commitments whilst also generating investment returns.

Capital management

We aim to manage capital efficiently and generate long-term sustainable returns for shareholders, while balancing operational, regulatory, and policyholder requirements.

Innovation

Driving innovation through effective use of customer feedback, technology and data ensures we remain relevant to the customer.

So we can maximise the value we create for our stakeholder in a sustainable way

Customes	Shareholders	Employees & Partners	Regulators and Governments	Communities
Our customers are the heart of our business. We are committed to building and sustaining long-term relationships based on mutual respect, trust and integrity. We support them to achieve their goals with the full range of our products and services.	We aim to create sustainable, long-term value for our shareholder by executing our strategy, growth and transformation plans, while maintaining risk and cost discipline, and delivering attractive returns on a foundation of a strong balance sheet.	Our people and our partner network are at the core of executing our business strategy. Our employees, together with our broad and specialised network of insurance intermediaries, play a decisive role in delivering high-quality products and services, responding to the needs of our customers and strengthening the relationship of trust with them. We continuously invest in skills development, productivity enhancement, and the creation of a modern and collaborative environment that supports the progress and growth of everyone.	We play our part in supporting the effective functioning of the financial system and the broader economy by proactively engaging with public authorities and by paying our taxes.	Our success is intrinsically linked with the success of Greece's regions. As a leading insurance Company in Greece, we believe we can make a real and positive difference to people's lives. We strive to operate as a sustainable and responsible Company, working with local partners to promote social and economic development.



6. Our Strategy

Our strategy focuses on accelerating growth, enhancing profitability, and managing capital efficiently, creating sustainable value for our customers, partners, and shareholders.



Strengthening & Expansion of Commercial Network

We are accelerating growth by enhancing the productivity of distribution networks, leveraging bancassurance, and selectively developing digital channels and strategic partnerships



Health Strategy

We focus on prudent portfolio management, controlling volatility and improving efficiency, as well as developing comprehensive solutions in the Health business segment



Enhancing Profitability

We enhance operational efficiency through disciplined underwriting, effective claims management, cost rationalisation, and a focused approach to the Non Life business segment



Strengthening The Balance Sheet

We strengthen the resilience of our balance sheet through disciplined capital and asset management, the effective use of reinsurance, and the optimisation of our funding structure



Customer Centricity & Focus On Front-Line

We enhance the overall experience at every point of interaction, strengthening the relationship with customers and partners, while supporting growth



Operational Efficiency

We simplify processes and strengthen an agile and efficient operating model



People & Culture Development

We foster a high-performance culture and invest in the continuous development of our people



Technology & Data

We leverage technology and data to support decision-making and accelerate transformation



7. Financial Review

7.1 Chief Financial Officer's report



Efstratios Petrou Chief Financial Officer (CFO)

“Our Company has consistently delivered on its commitments to our customers, our people, and our shareholder, despite operating in an environment where the only certainty is uncertainty. We have exceeded our already ambitious targets, demonstrating the resilience embedded in our strategic planning, which we manage with rigour and discipline. Our results reflect the strength of our focused and effective execution of our strategy”

The year 2025 marks a milestone for Ethniki Asfalistiki. The acquisition of Ethniki Asfalistiki by the Piraeus Group is expected to provide the Company with a significant competitive advantage. The expertise, long-standing experience, and strong reputation of Ethniki Asfalistiki are now reinforced by the dynamic and productive Piraeus Group. Together, we are shaping the future of the Company, which is expected to play a leading role in the insurance market in the years ahead, with a primary focus on offering comprehensive solutions to our customers.

The acquisition of the Company by Piraeus Bank substantially strengthens our prospects. Becoming part of a leading financial institution enhances our financial position, expands our growth potential, and places us in an even stronger position to capture new opportunities emerging in the Greek insurance market. The continuously accelerating operational and digital transformation, with the customer at its core, combined with the strength of the leading bancassurance network in Greece, that of Piraeus, is expected to deliver top-tier services and products to our customers. It will also significantly improve the Company’s return on equity, driven primarily by revenue growth, disciplined risk selection, and economies of scale.

Building on its long-standing heritage, and now further strengthened and continuously evolving, the Company is well positioned to continue creating lasting and sustainable value for its customers, partners, and shareholder.

During 2025, the Company significantly improved its financial performance, demonstrating resilience in a year marked by broader geopolitical and macroeconomic challenges, which are further intensifying in 2026. Progress across our key strategic pillars and the effectiveness of our operating model were substantially strengthened, driven by the disciplined execution of our objectives and the continuous enhancement of profitability.

Key Highlights	2025	2024	Change
Profit/ (Loss) before tax	48,014	14,812	33,202
Adjusted operating profit	44,502	26,204	18,298
Investment income ³	100,537	99,810	727
Total expenses	(111,691)	(125,514)	13,823
Store of future profit ¹	679,261	670,496	8,765
Adjusted Return on Equity ²	8.4%	3.5%	4.9 ppt

Unless otherwise stated, all amounts in Section 7 are presented in thousands of euros.

¹ Stock of future profit is the addition of the CSM (Contractual Service Margin) and the risk adjustment (RA) and represents the future profit recognised in the statement of financial position to unwind into profit over time.

² It is calculated as normalised profit divided by the average value of shareholders' equity, adjusted to exclude subordinated debt.

³ The net result from investment contracts and the gains from the disposal of investment property are excluded.

Financial Performance Overview

Profit Before Tax (IFRS)

Profit before tax reached €48 million, a significant increase compared to €14.8 million in 2024. This improvement, reflects the progress achieved across the Company’s key transformation initiatives, is primarily driven by prudent risk selection—despite the adverse claims experience in the Legacy Health Portfolio—the excellent management of the investment portfolio, and the more effective control of operating expenses. The 2025 results also include a non-organic gain of €26 million from the sale of the Cyprus subsidiary, which was successfully completed in the third quarter of the year.

Adjusted Operating Result

Operating profit, adjusted to reflect, among other items, a €25 million charge for losses arising from onerous insurance contracts in the Legacy Health Portfolio, reached €44.5 million, marking a notable increase of €18.3 million compared to 2024. This strong performance was supported by the improvement in the technical result across both the Legacy and New Health Portfolios, the consistently positive contribution of the investment portfolio, as well as the disciplined management of operating expenses.

Investment Income

Investment income amounted to €101 million, remaining stable despite the persistent uncertainty in financial markets. Approximately €21.3 million of this total was generated from realised gains and fair value movements of financial assets, reflecting a slight decrease of €0.8 million compared with the prior year.

The Company continues to manage a well-diversified and resilient investment portfolio, effectively mitigating the effects of market volatility driven by interest rate movements and ongoing geopolitical uncertainty.

As a result, the investment portfolio delivered an overall return of 3% in 2025, compared with 2.9% in the previous year.



Expenses

Total expenses amounted to €111.7 million, compared with €125.5 million in the prior year, representing a significant reduction of €13.8 million. This decrease was predominantly driven by the voluntary exit scheme implemented in 2024, which was not repeated in 2025.

Excluding exceptional and non-recurring items, operating expenses amounted to €101 million, remaining broadly stable as the Company continues to apply a disciplined and efficient cost-management approach.

Stock future profit

Stock future profit increased by €8.8 million, reaching €679.3 million, despite lower production in Unit-Linked products. The Company continues to demonstrate strong long-term organic profitability, further reinforcing the sustainability and resilience of its business model.

Adjusted operating margin analysis	2025	2024	Change
Insurance revenue	656,463	572,515	83,948
Insurance service expenses	(500,786)	(656,121)	155,335
Net income/(expense) from reinsurance contracts held	(125,713)	97,112	(222,825)
Net Investment & Finance Income	42,359	39,181	3,179
Non-attributable expenses (recurring)	(28,423)	(28,072)	(350)
Other income	602	1,590	(988)
Adjusted operating margin	44,502	26,204	18,298

7.2 Operating Performance

The portfolio of the Company is divided into New Book and Closed Book. The Closed Book portfolio includes life products with guaranteed returns as well as lifetime health covers that are not open to new sales.

The New Book portfolio includes unit-linked products, protection products, annually renewable health policies, long-term health covers that are expected to generate future profitability. It also includes group life and health policies as well as non-life insurance policies.

7.2.1 Gross Written Premiums

Gross Written Premiums	2025	2024	Change	% change
Life				
New Book	158,173	214,824	(56,651)	-26.4%
Closed Book	73,828	83,110	(9,282)	-11.2%
Total Life	232,001	297,934	(65,933)	-22.1%
Health				
New Book	201,360	176,189	25,170	14.3%
Closed Book	148,655	146,380	2,275	1.6%
Total Health	350,015	322,569	27,446	8.5%
Total Life and Health	582,016	620,503	(38,487)	-6.2%
Motor	79,905	69,250	10,654	15.4%
Property	120,247	114,327	5,920	5.2%
Other Non-Life	52,449	46,209	6,240	13.5%
Total Non Life	252,601	229,786	22,815	9.9%
Total GWP	834,616	850,289	(15,673)	-1.8%

Total Gross Written Premiums (GWP) for 2025 amounted to €834.6 million, compared to €850.3 million in 2024, representing a decrease of 1.8%, despite strong growth in the Group Life & Health Insurance and Non Life segments, which exceeded both targets and prior-year performance.

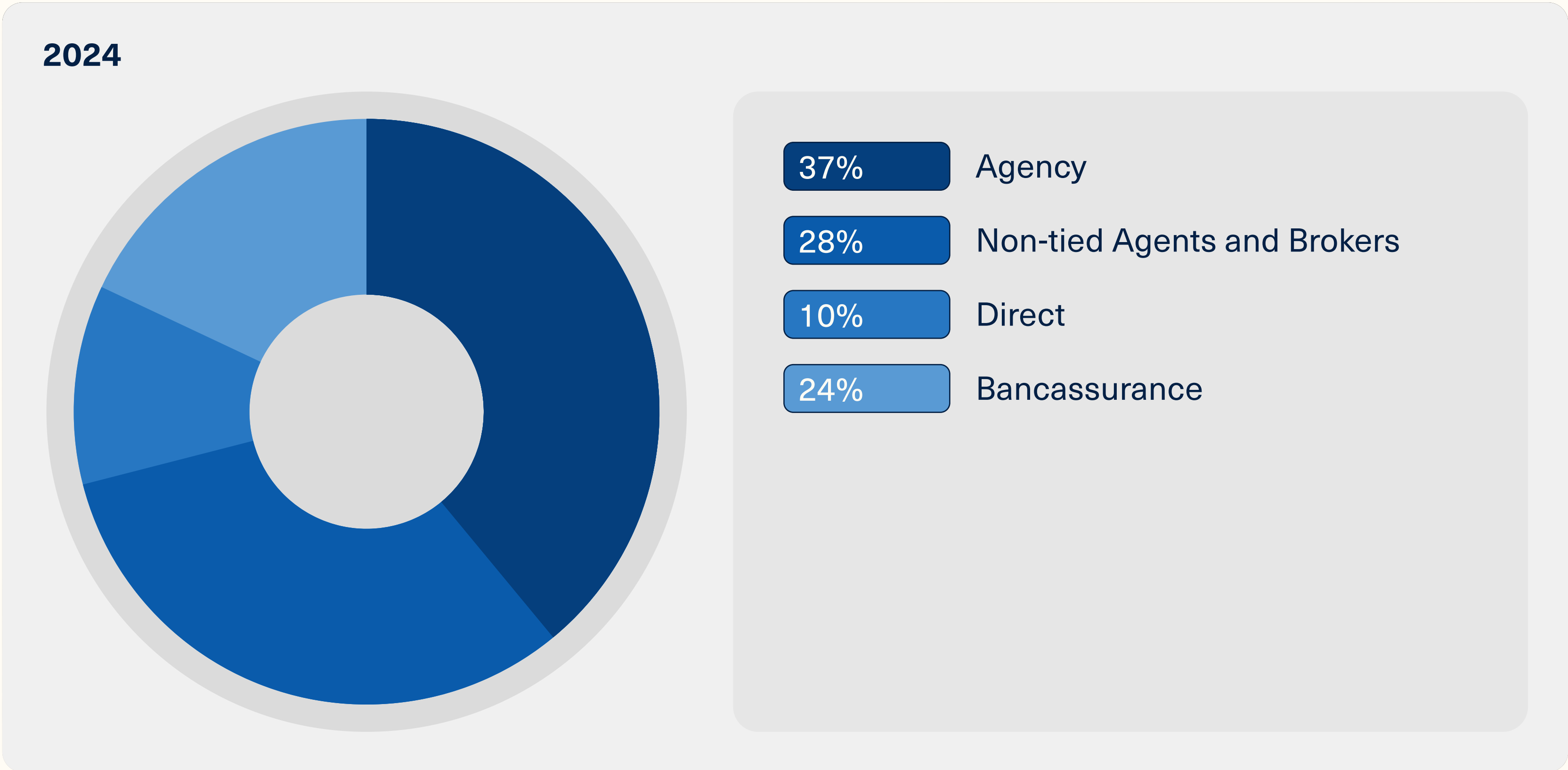
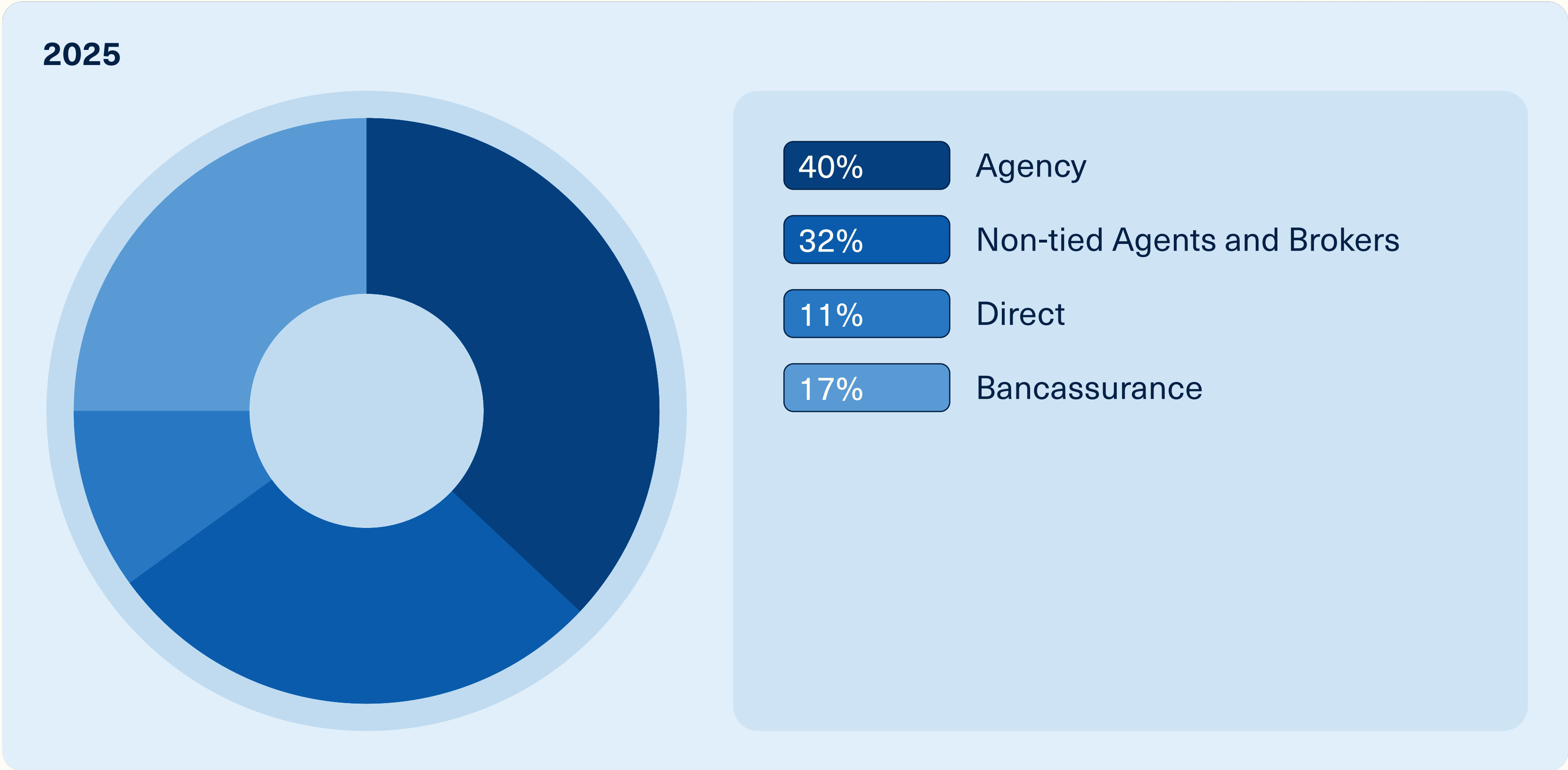
Life & Health business recorded an annual decrease of 6.2%, primarily driven by a decline in the production of new single premium unit linked policies (New Unit Linked Single Premium) by €73.6 million, primarily through the bancassurance channel.

The New Book is in continuous growth driven both by new business in Health annual renewable policies and by premium adjustments.

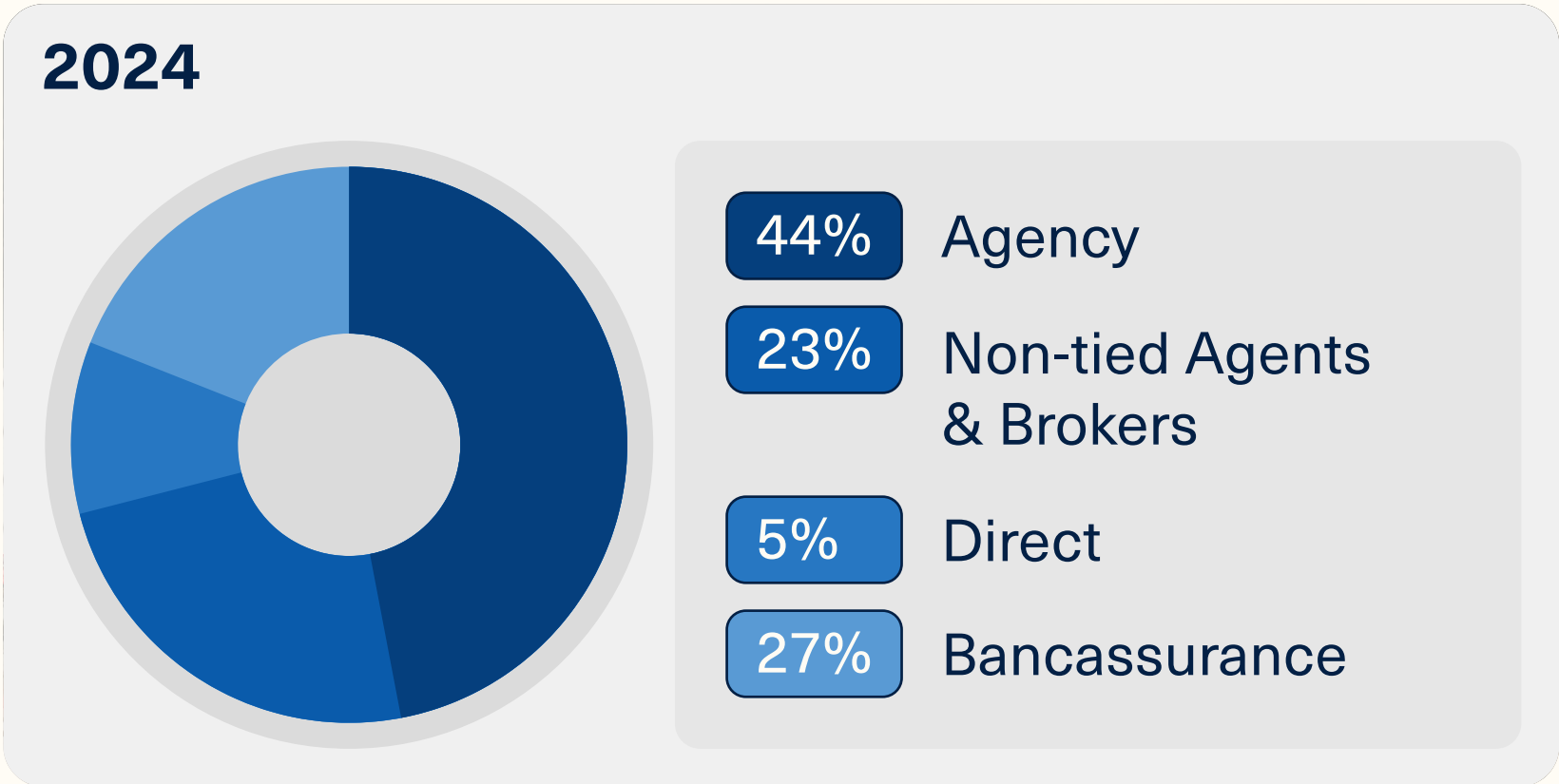
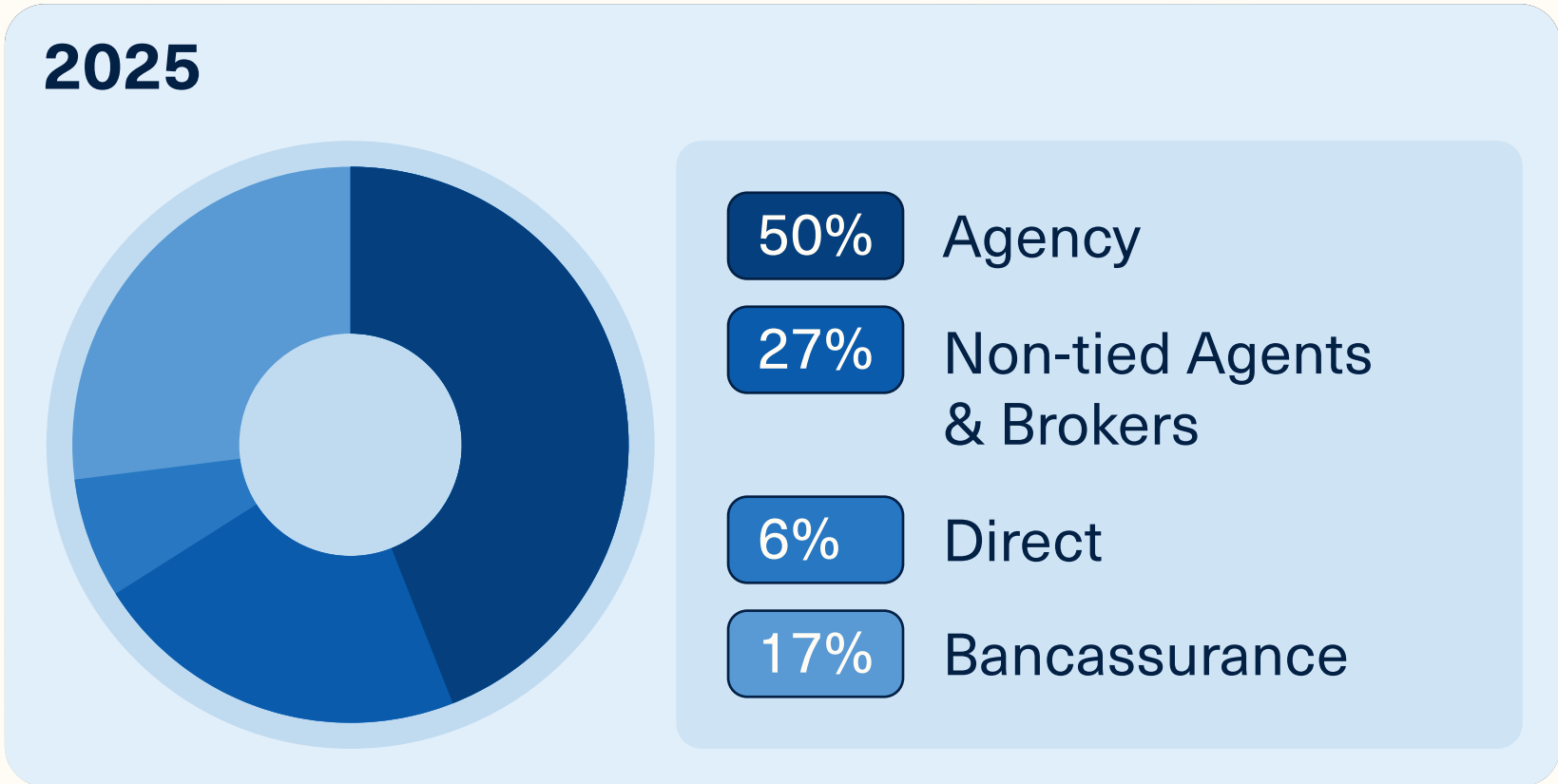
Non Life business recorded an annual increase of 9.9%, driven by their overall strong performance, with a particularly notable contribution from the Motor segment, which was further supported by incentives offered through the brokers' distribution channel.



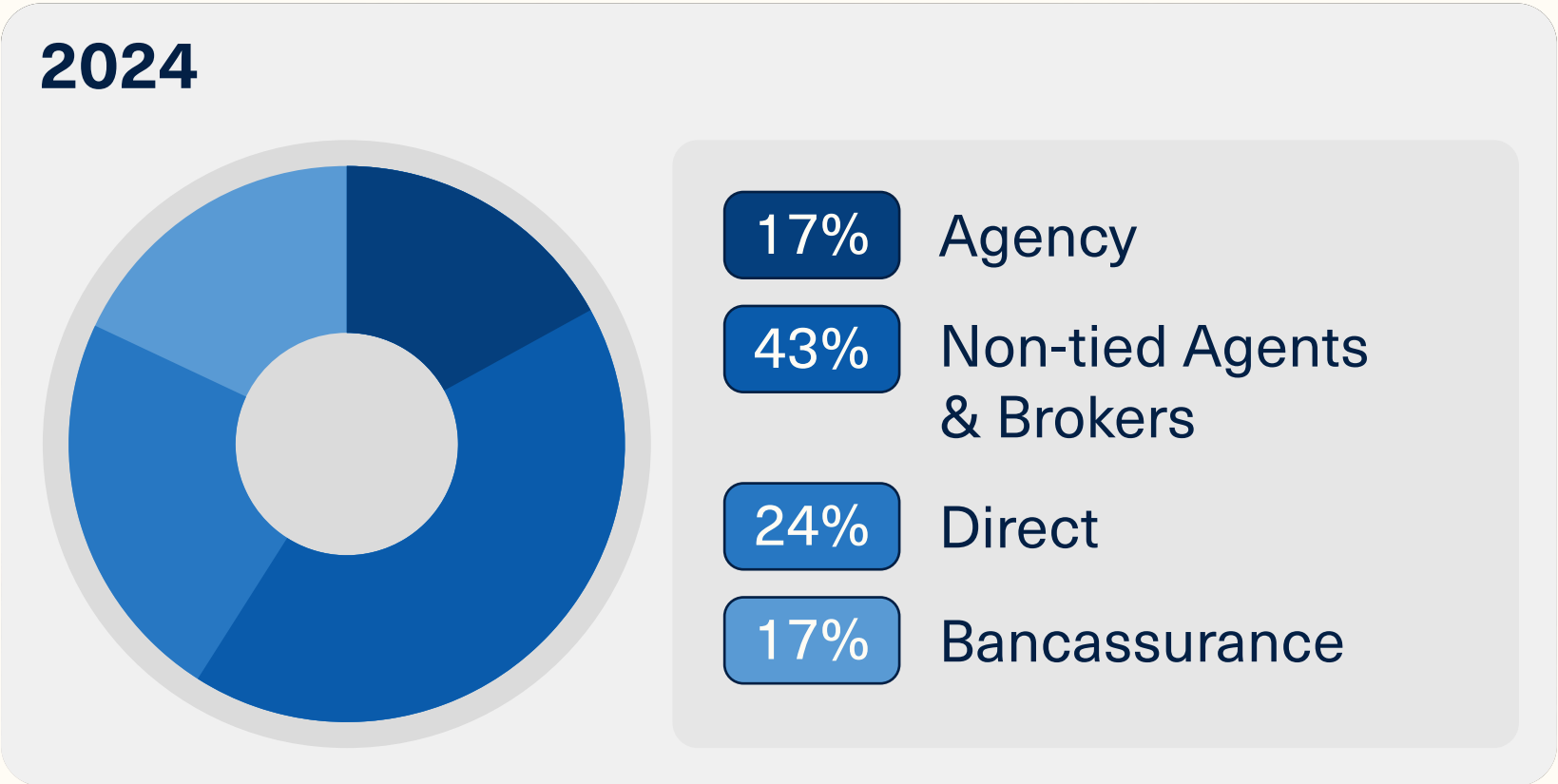
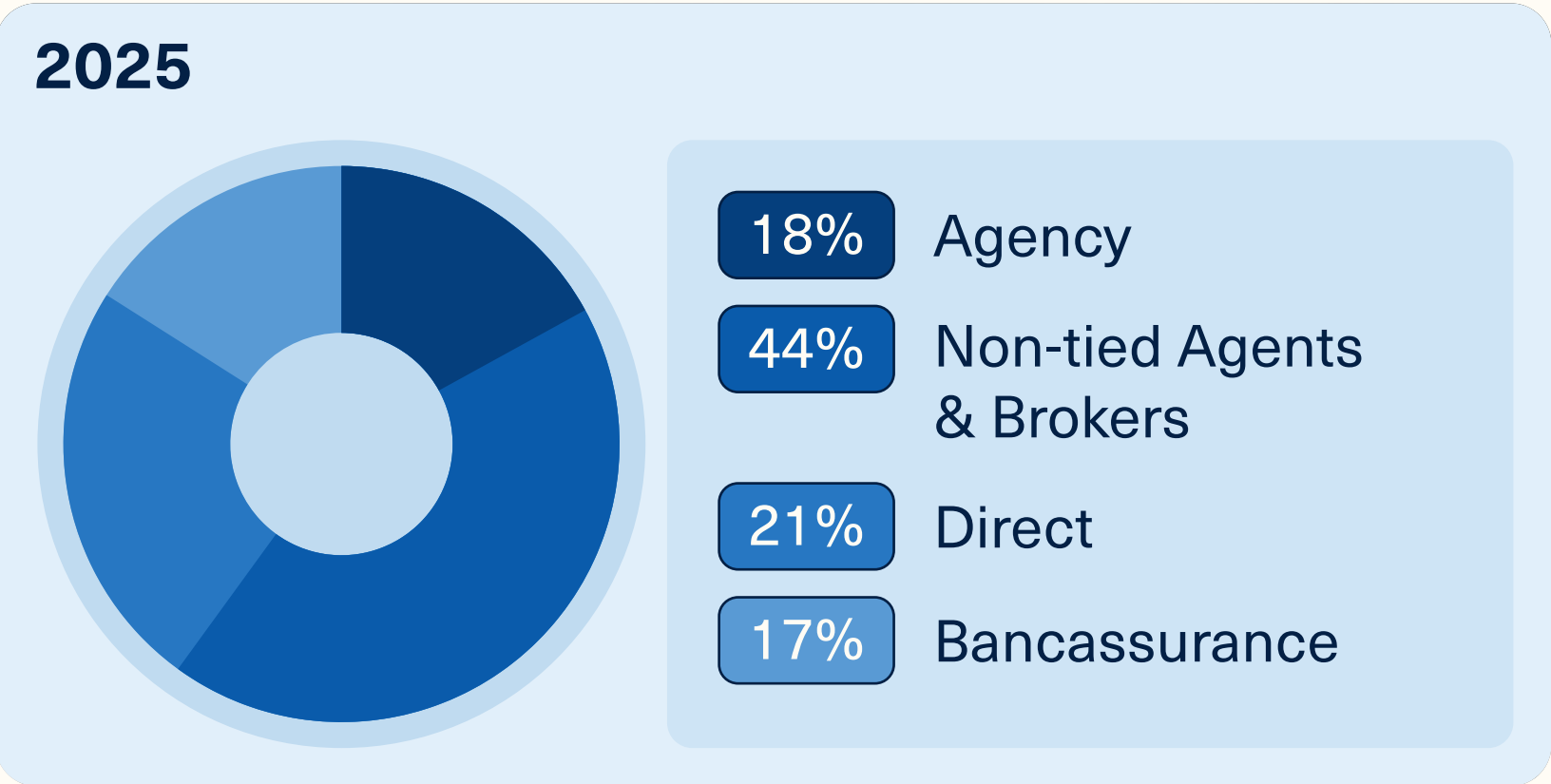
GWP by distribution channel



Life & Health by Distribution Channel



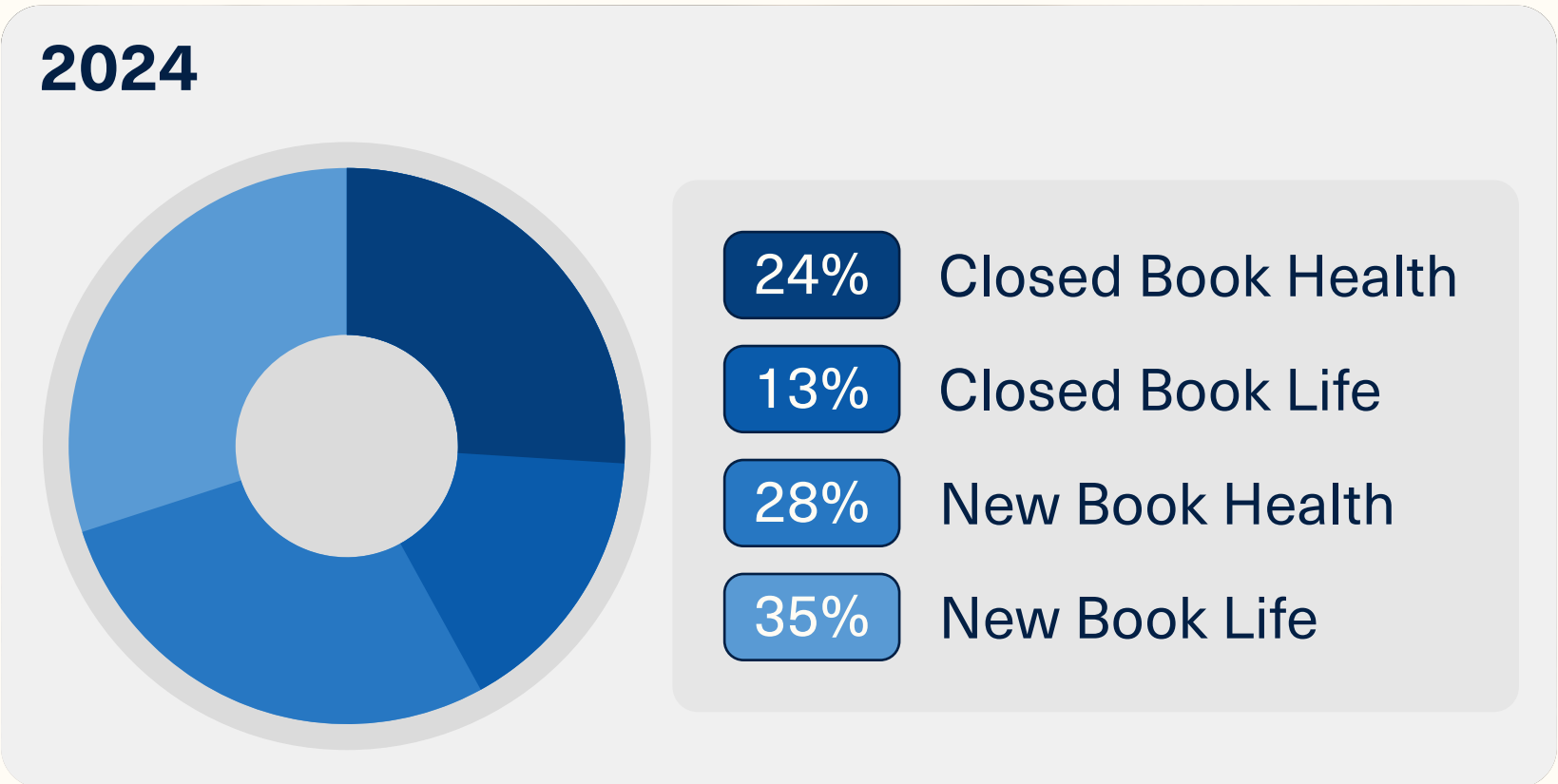
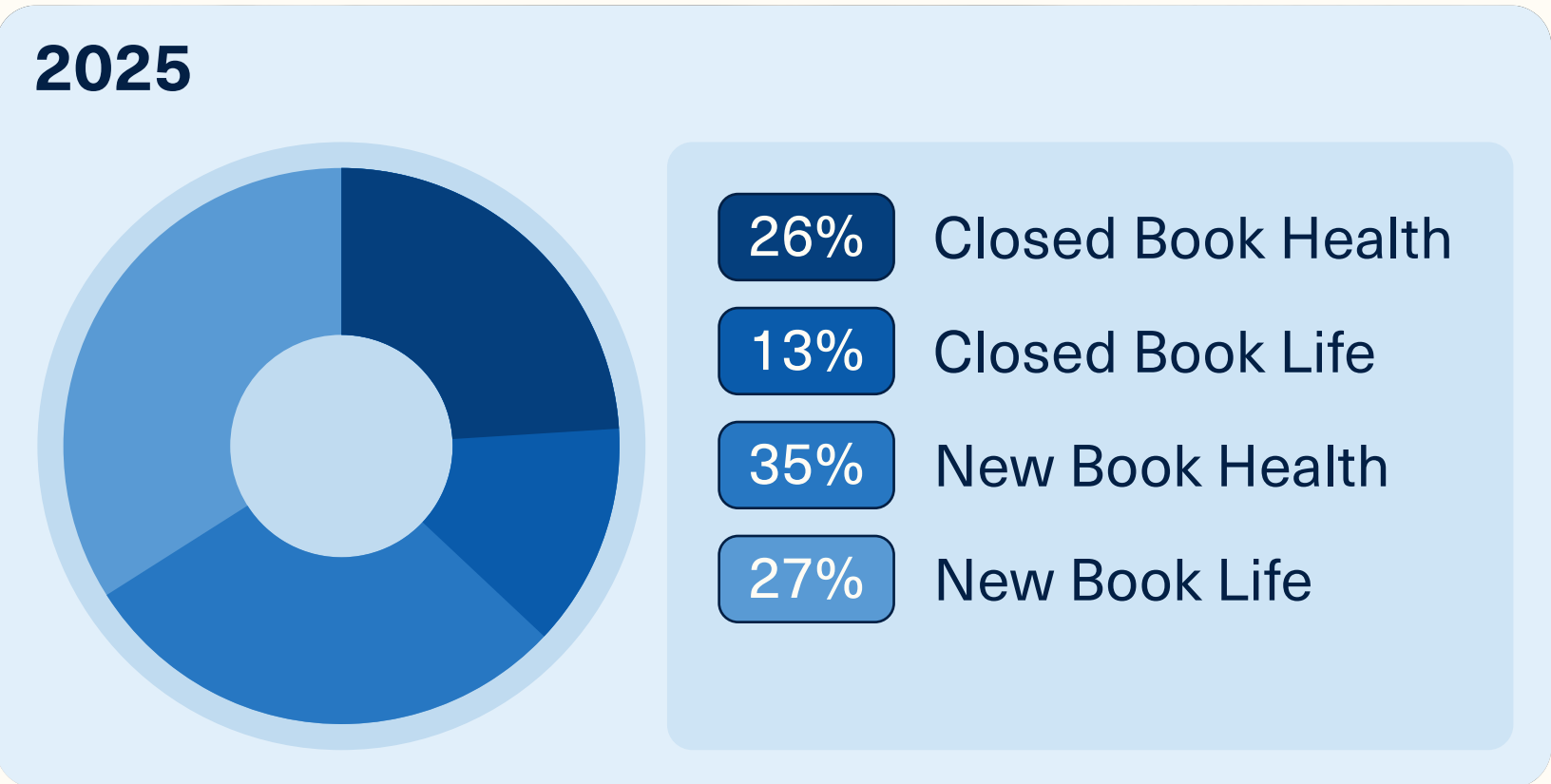
Non Life by Distribution channel



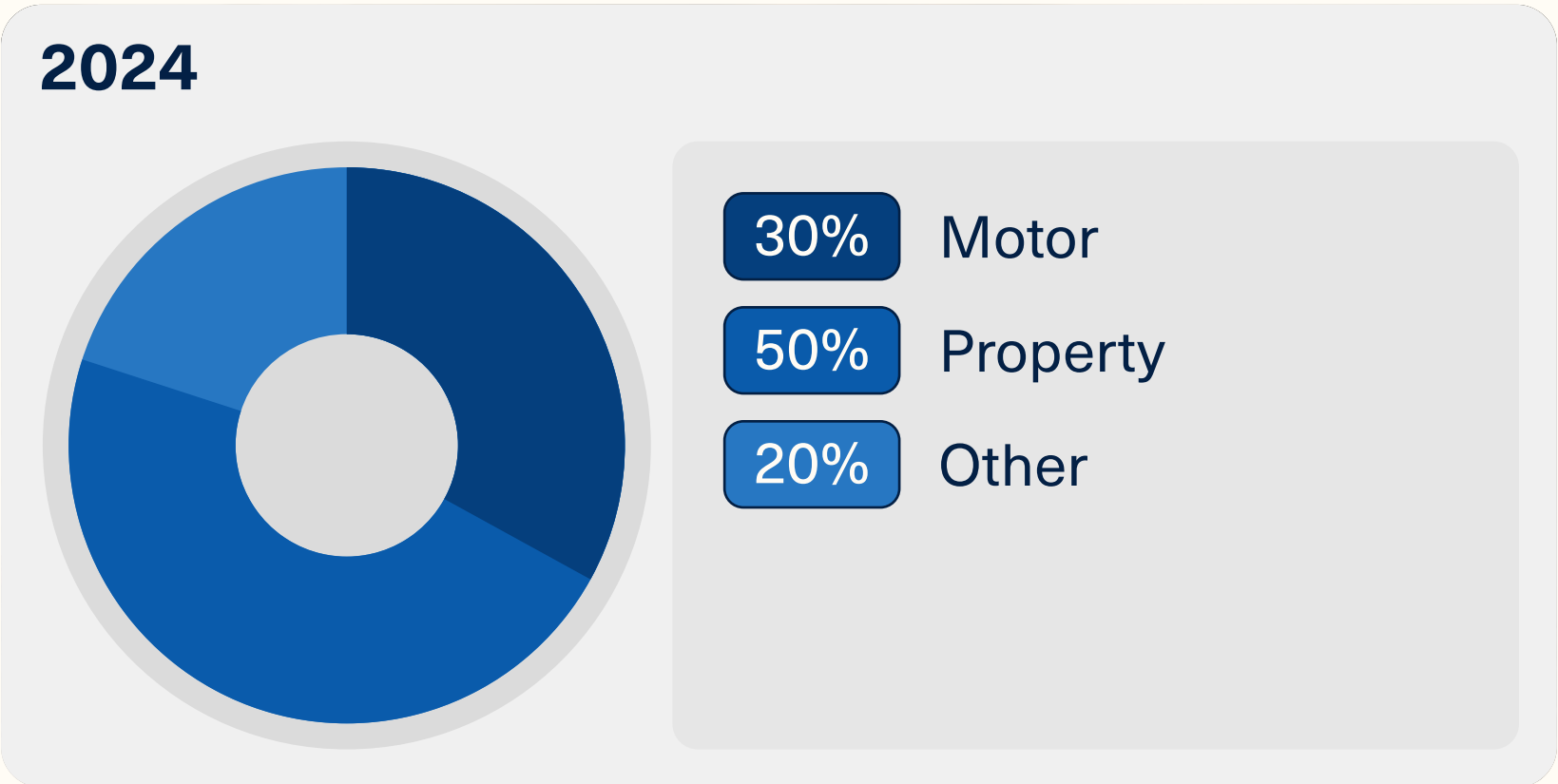
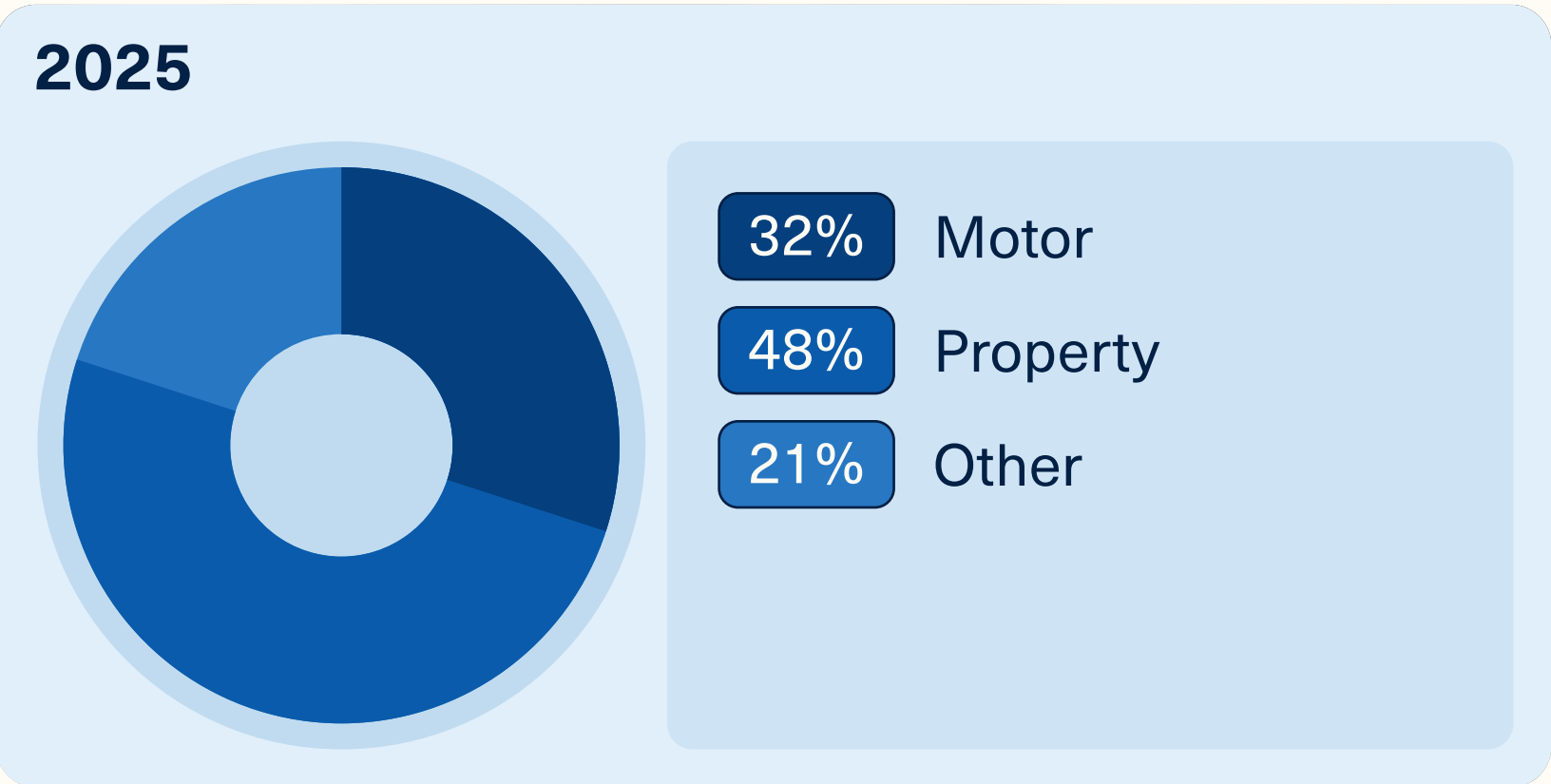
In Life and Health Segment, all distribution channels recorded significant growth, with the exception of the bancassurance channel, which was negatively impacted primarily by new single premium unit-linked policies (New Unit Linked Single Premium), a substantial portion of which were not issued.

In Other Non Life, all distribution channels—excluding the Direct channel—demonstrated growth in 2025 compared to 2024.

Life & Health GWP Analysis



Non Life GWP Analysis



7.2.2 Life & Health Results analysis

Key Figures for Life & Health	2025	2024	Change
Gross written premium	582,016	620,504	-38,488
Profit/(Loss) before Tax	24,777	(1,416)	26,193
Adjusted operating profit	27,980	2,283	25,697
Adjusted operating margin %	4.81%	0.35%	4.5 p.pt
Store of Future Profit (CSM & RA)	679,261	670,496	8,765

Analysis of Adjusted Operating Margin - Life & Health	2025	2024	Change
Insurance revenue	414,317	361,187	53,129
Insurance service expenses	(395,200)	(365,483)	(29,717)
Net income/(expense) from reinsurance contracts held	(4,900)	(5,304)	404
Net Investment & Finance Income	29,913	30,536	(623)
Non-attributable expenses (recurring)	(16,513)	(19,333)	2,820
Other income	364	681	(317)
Adjusted operating margin	27,980	2,283	25,697

Life

Key Figures for Life	2025			2024		
	New Book	Closed Book	Total	New Book	Closed Book	Total
Gross written premium	158,173	73,828	232,001	214,824	83,110	297,934
Profit/(Loss) before Tax	11,503	17,614	29,117	1,465	20,940	22,405
Adjusted operating profit	8,755	10,621	19,375	8,848	14,429	23,277
Adjusted operating margin %	5.5%	14.4%	8.4%	4.1%	17.2%	7.8%
Store of Future Profit (CSM & RA)	63,868	65,630	129,498	54,046	72,507	126,553

Production Challenges and Profitability Recovery

Life insurance revenues recorded a year-on-year decrease of 22%, with total premiums amounting to €232.0 million compared with €297.9 million in 2024. This decline is mainly attributable to the New Portfolio and reflects the reduction in production of single-premium Unit-Linked products, which fell by €73.6 million.

This development is closely linked to the change in the Company's shareholding structure and its integration into Piraeus Bank, which influenced the performance of the bancassurance channel during the transition period. In parallel, the Legacy Portfolio continued its natural run-off through policy maturities, with premiums decreasing to €73.8 million.

Despite revenue pressure, profitability remained exceptionally resilient. Profit before tax rose to €29.1 million (from €22.4 million in 2024), with the new portfolio turning profitable. The adjusted operating margin improved to 8.4%, while the future profitability reserve (CSM & RA) remained strong at €129.5 million, underpinning the segment's long-term value creation.

Health

Key Figures for Health	2025			2024		
	New Book	Closed Book	Total	New Book	Closed Book	Total
Gross written premium	201,360	148,655	350,015	176,189	146,380	322,569
Profit/(Loss) before Tax	4,231	(8,570)	(4,340)	(6,336)	(17,485)	(23,821)
Adjusted operating profit	(1,330)	9,935	8,605	(6,236)	(14,758)	(20,994)
Adjusted operating margin %	(0.7%)	6.7%	2.5%	(3.5%)	(10.1%)	(6.5%)
Loss ratio	70.1%	-	-	71.5%	-	-
Store of Future Profit (CSM & RA)	-	549,763	549,763	-	543,943	543,943

Strong Momentum in Operational Recovery

In the Health segment, the 2025 results reinforce the strong momentum established in 2024. Total premiums increased by 8.5% (€350.0 million), with the New Portfolio advancing by 14.3%, continuing last year's upward trajectory supported by new business growth and targeted premium adjustments, owing to increased paid claims. In the Legacy Portfolio, the marginal 1.6% increase reflects the extent to which premium adjustments effectively offset the natural run-off of policies.

Profitability strengthened significantly, with the adjusted operating result returning to positive levels (€8.6 million), driven primarily by the performance of the Legacy Portfolio and reflecting the effectiveness of targeted loss-management initiatives. The Future Profitability Reserve (CSM) remained robust at €549.8 million, reaffirming the segment's long-term resilience and value-generating capacity.



7.2.3 Non Life results analysis

Key Figures for Non Life	2025	2024	Total
Gross written premium	252,601	229,786	22,815
Profit before Tax	23,237	16,229	7,008
Adjusted operating profit	16,522	23,920	(7,398)
Adjusted operating margin %	6.5%	10.5%	(3.9 p.pt)

Analysis of Adjusted Operating Margin - Non Life	2025	2024
Insurance Revenue	242,146	211,328
Insurance service expenses	(105,586)	(290,638)
Net income/expense from reinsurance contracts held	(120,813)	102,416
Net Investment & Finance Income	12,446	8,645
Non-attributable expenses (recurring)	(11,910)	(8,739)
Other income	238	909
Adjusted operating margin	16,522	23,920

The Non Life segment continued its growth trajectory in 2025, maintaining a strong focus on expanding production despite ongoing challenges in operating profitability.

Gross written premiums increased by 9.9%, reaching €252.6 million compared with €229.8 million in 2024, reaffirming the Company’s strategic focus on the Non-Life segment. This growth continues the positive trend observed last year and is driven by the strong performance of the Property and Motor lines, which historically constitute the core of the General Insurance portfolio.

Profit before tax increased significantly by 43%, reaching €23.2 million compared with €16.2 million in 2024. This improvement exceeds last year’s growth and reflects more effective risk selection, enhanced claims management, and stronger investment results, all of which helped offset operating pressures.

In contrast to net profitability, adjusted operating profit declined by 31% to €16.5 million, as the previous year had been exceptionally supported by favourable prior-year claims settlements from reinsurers.

Overall, consistent portfolio management and strong underwriting fundamentals continued to generate solid results, despite persistent market challenges, inflationary pressures and the effects from climate change.

Motor

Key Figures for Motor	2025	2024	Change
Gross written premium	79,905	69,250	10,654
Profit before Tax	12,146	5,649	6,497
Adjusted operating profit	9,046	8,001	1,045
Adjusted operating margin %	11%	12%	(0.2 p.pt)
Loss ratio ¹	52.4%	51.6%	0.8 p.pt

Represents claims and benefits net of reinsurance divided by insurance revenue net of reinsurance ¹

In 2025, the Motor Insurance segment delivered robust growth and a marked strengthening of profitability, firmly reinforcing its role as a cornerstone of the General Insurance portfolio.

Gross written premiums grew by 15.4% (€79.9 million versus €69.2 million in 2024), marking a substantially stronger pace than last year’s 3.1% increase. This performance was driven by the expansion of the insured fleet and the Company's effective customer-retention strategy, achieved despite the highly competitive market landscape.

Profit before tax rose sharply to €12.1 million, fully reversing the decline recorded in 2024.

The loss ratio held at a strong 52.4%, rising only modestly by 0.8 percentage points compared with 2024. This resilience reflects the Company’s robust underwriting discipline, effectively absorbing claim-cost inflation.

Adjusted operating profit increased by 13% (€9.0 million), maintaining a solid operating margin of 11%

Analysis of Adjusted Operating Margin - Motor	2025	2024	Change
Insurance revenue	74,220	66,008	8,211
Insurance service expenses	(62,497)	(55,683)	(6,813)
Net income/(expense) from reinsurance contracts held	(5,000)	(4,135)	(865)
Net Investment & Finance Income	7,038	5,108	1,930
Non-attributable expenses (recurring)	(4,784)	(3,424)	(1,360)
Other income	69	128	(58)
Adjusted operating result	9,046	8,001	1,045



Property

Key Figures for Property	2025	2024	Change
Gross written premium	120,247	114,327	5,920
Profit before tax	10,418	13,648	(3,230)
Adjusted operating profit	7,811	14,350	(6,539)
Adjusted operating margin %	6.5%	12.6%	(6.1)
Loss ratio ¹	0.4%	(21.1%)	21.5 p.pt

¹ Calculated as the sum of claims and benefits net of reinsurance divided by insurance revenue net of reinsurance

The Property Insurance segment sustained its growth in 2025, pairing higher production with a steady improvement in operating performance.

Gross written premiums increased by 5.2% (€120.2 million versus €114.3 million in 2024). This performance reflects the Company’s continued penetration across both the corporate and retail portfolios, sustaining the positive momentum of recent years.

Adjusted operating profit amounted to €7.8 million, a 45.6% decrease compared with the €14.4 million reported in 2024. This movement brought the adjusted operating margin to 6.5% (from 12.6%), a development that was anticipated given that prior-year results were exceptionally supported by favourable reinsurer settlements on prior-year claims.

The loss ratio normalised to 0.4%. Despite the increase compared with the previous year, this level remains exceptionally low, reflecting the high quality of the portfolio, the Company’s effective underwriting discipline, and the absence of major loss events during the year.

Analysis of Adjusted Operating Margin - Property	2025	2024	Change
Insurance revenue	118,168	104,005	14,163
Insurance service expenses	(16,393)	(181,025)	164,632
Net income/(expense) from reinsurance contracts held	(93,375)	91,657	(185,031)
Net Investment & Finance Income	4,053	2,860	1,192
Non-attributable expenses (recurring)	(4,762)	(3,348)	(1,413)
Other income	119	201	(82)
Adjusted operating result	7,811	14,350	(6,539)

7.2.4 Analysis of expenses

Operating expenses for the Company, excluding the cost of the Voluntary Exit Scheme and other transformation-related expenses, amounted to €100.5m in 2025, compared to €100.8m in 2024, and are presented in detail below:

Expenses	2025	2024	Change	% Change
Staff and other related costs	(51,163)	(52,861)	1,698	-3.2%
General and administrative expenses	(49,399)	(47,978)	(1,420)	3.0%
Operating expenses	(100,562)	(100,839)	278	-0.3%
Voluntary exit scheme (VES)	-	(11,258)	11,258	-100%
Transformation and other expenses	(11,130)	(13,417)	2,287	-17%
Total non operating expenses	(11,130)	(24,675)	13,545	-54.9%
Total Expenses	(111,691)	(125,514)	13,823	-11%

Staff costs decreased by €1.7m compared to the previous year, primarily driven by applying the Company’s new policy on capitalisation of payroll expenditure for specific work groups within the Technology and Strategic Transformation Divisions.

The average number of employees of the Company for 2025 amounted to 665 (2024: 673), confirming its continued investment in human capital. This strategy contributes to ensuring growth and maintaining competitiveness in an ever-changing business environment.

General and administrative expenses exhibited an increase of 3%, a development mainly attributed to higher Marketing expenses, as well as the Company’s expanded presence through significant promotional activities carried out during the year.

During 2025, the Company recorded non-operating expenses amounting to €11.1 million, compared to €24.7 million in 2024. This decrease is chiefly attributed to the cost of the Voluntary Exit Scheme, which in 2024 amounted to €11.3 million, while no corresponding scheme was implemented in 2025. At the same time, the Company continued to make substantial investments in its transformation plan in 2025, aiming to provide higher-quality services to our customers and to significantly strengthen future profitability.



7.3 Investment Portfolio & Income

2025 in brief

2025 was another year shaped by moderate global growth, easing inflation and ongoing policy uncertainty. Although the global economy continued to expand, the pace slowed, with the IMF projecting global GDP growth of 3.2% in 2025, down from 3.3% in 2024, with expectations of further softening into 2026. Inflation continued to decline across most major economies, though it remained uneven, particularly in the United States where higher for longer rate expectations tightened global financial conditions.

Market Overview

Across the European Union, economic activity in 2025 exceeded expectations. The European Commission reported that the EU economy outperformed initial forecasts, boosted by front loaded exports in anticipation of U.S. tariff increases and stronger than expected investment activity in the first nine months of the year. Real GDP for the EU is projected to grow at around 1.4% in both 2025 and 2026, reflecting the region's ability to maintain momentum despite trade and geopolitical uncertainties.

Inflation moved closer to the ECB's target, with euro area headline inflation expected to average 2.1% in 2025 and 1.9% in 2026, supported by lower imported inflation and improving financial conditions. Similarly, Eurozone GDP growth, based on the latest available data, was projected at 1.2% in 2025 and Eurozone inflation was expected to fall below the ECB's 2% target by year end, as rate cutting cycles approached completion.

At the same time, policy actions in the U.S. exerted global influence. Renewed U.S. tariff policies and spending cuts under the new administration contributed to global trade uncertainty and slower expected growth, while reinforcing U.S. dollar strength relative to most major currencies. These dynamics intensified volatility across fixed income markets, although corporate credit remained stable, supported by low default rates and strong balance sheet fundamentals.

Energy markets and supply chain conditions were influenced by heightened tensions in the Middle East, which amplified volatility in oil prices and added noise to inflation expectations globally.

Political & Geopolitical Environment

Geopolitical developments continued to weigh on the European economic outlook throughout 2025. The European Commission and CEPR highlighted that Russia's ongoing war of aggression against Ukraine remained a significant drag on EU performance, particularly for countries near the conflict, while also necessitating greater EU defence spending and unified financial support to sustain regional stability.

Within the EU, the macroeconomic environment benefited from growth supportive fiscal measures, resilient labour markets, rising real wages and improving financing conditions, as confirmed by the ECB's December 2025 assessment. These factors helped offset external shocks and supported domestic demand.

Global political conditions also contributed to volatility. The U.S. administration's policy agenda—including stricter tariff measures and reduced government spending—generated fluctuations in global markets and influenced European export dynamics. Meanwhile, decreasing global uncertainty following the EU-U.S. trade deal reduced some trade policy risk, although broader geopolitical pressures persisted.

2025 in numbers

Fixed income markets benefited from the decline in inflation, improving financing conditions and resilient credit fundamentals across the EU. The ECB projected euro area growth of 1.4% in 2025, supported by domestic demand and stronger real wage growth, while latest data confirmed the expectation of modest but positive expansion, alongside inflation falling below target levels by year end.

Performance dispersion across equities, private markets and interest sensitive sectors remained elevated due to ongoing policy uncertainty, energy market volatility and currency movements.

Investment Portfolio & Net Investment Income

The Company continued to balance performance, liquidity and solvency through disciplined asset allocation and strengthened Asset Liability Management. The portfolio remained conservatively positioned, with fixed income representing 79% of total assets under management. Other allocations included 11% in mutual funds, 4% in private equity funds, 1% in loans, 2% in investment property, 2% in equity holdings and 1% in cash & term deposits. Credit quality remained strong, with 95% of debt securities rated investment grade (AAA–BBB).

Net Investment Income for 2025 reached €101m, including interest expense. Recurring income streams remained robust, driven by:

- **Interest income:** €53.7m
- **Dividend income:** €7.4m
- **Rental income:** €1.6m
- **Unit Linked income:** €29.0m,

while foreign exchange movements had a marginal negative impact.

Furthermore, based on the average book value of the investment portfolio, 2025 average performance* was:

- 2.5% for the general account and own funds
- 5.6% for Unit Linked portfolios
- 3.0% overall

¹ Total Investment Income including interest expense / Average Book Value of Investment Portfolio



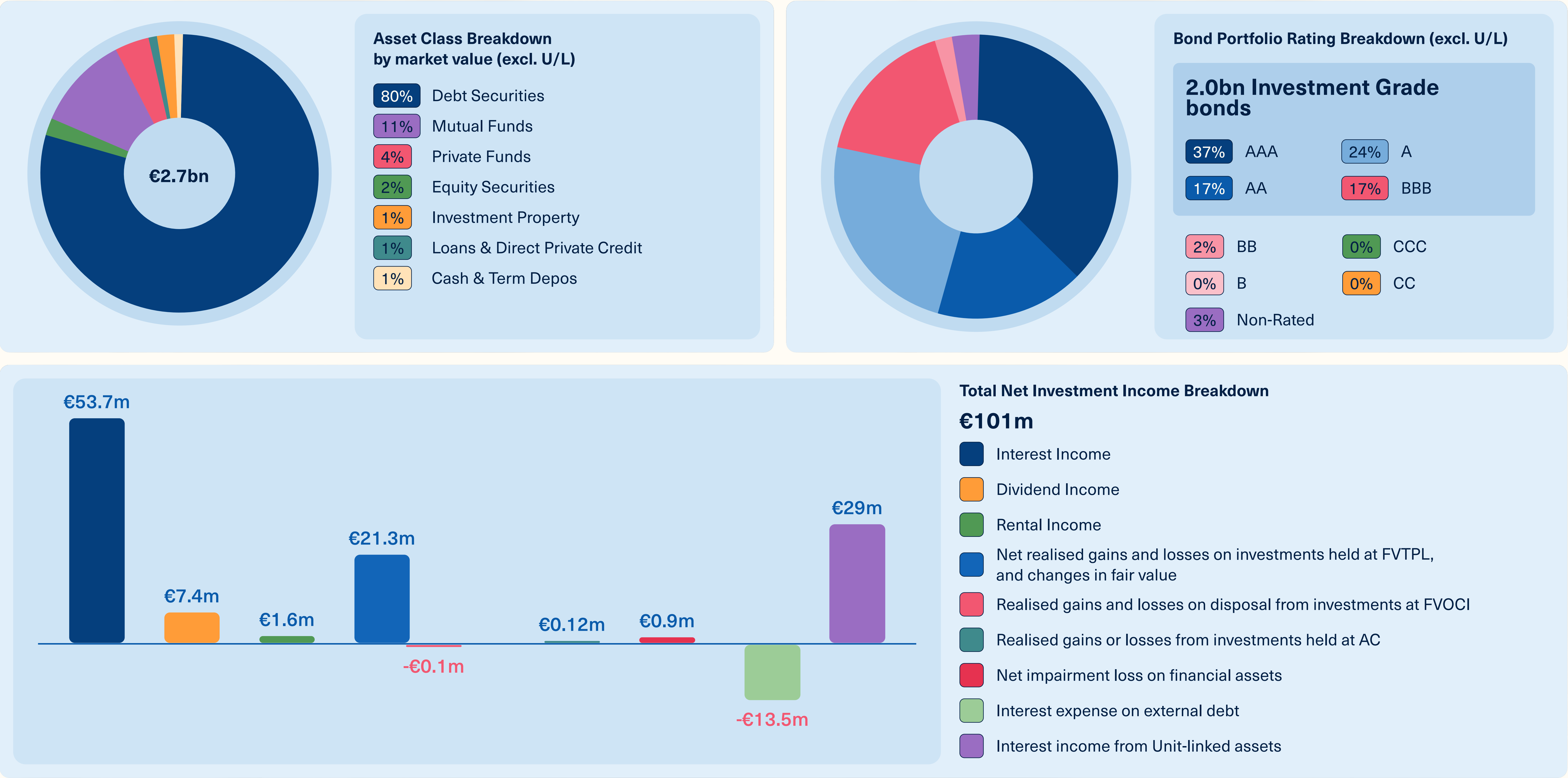
Responsible Investments

During 2025, the Company continued to advance its Responsible Investment strategy, strengthening its alignment with long term ESG commitments. Building on the progress of prior years, the Company further continued to expand its exposure to green and sustainable bonds, surpassing already its 2027 target of €600 million.

As the sustainable investment landscape evolves, the Company remains committed to integrating ESG considerations across all relevant asset classes, enhancing transparency, and ensuring that capital allocation supports environmental and social resilience.

The Company will continue to prioritise responsible investment practices, reinforcing sustainability as a core pillar of its long term investment philosophy.

Total Company



7.4 Balance sheet review

(€ thousands)

Key Figures Balance Sheet	2025	2024	Change	% change
Assets under management (excluding Unit-linked)	2,746,894	2,851,118	(104,224)	-3.7%
Unit-linked assets	508,091	525,128	(17,037)	-3.2%
Reinsurance contract assets (net)	145,871	285,108	(139,238)	-48.8%
Other assets	464,377	388,571	75,806	19.5%
Total assets	3,865,233	4,049,925	(184,692)	-4.6%
Insurance contract liabilities (net)	2,162,626	2,294,373	(131,747)	-5.7%
Investment contract liabilities	1,008,973	1,030,128	(21,156)	-2.1%
Financial liabilities	177,127	177,127	-	0.0%
Other liabilities	175,063	174,932	131	0.1%
Total liabilities	3,523,789	3,676,560	(152,772)	-4.2%
Shareholders' equity	341,444	373,365	(31,921)	-8.5%
Solvency ratio with transitional measures	177.0%	188.0%	-11 p.pt	

Investment Portfolio

Please refer to section 7.3 of the BoD Report.

Insurance Liabilities

	2025	2024	Change	% change
Insurance contracts				
- Life Risk & Savings ¹	1,290,016	1,267,629	22,387	1.8%
- Participating	393,922	422,935	(29,013)	-6.9%
- Life & Health	97,286	87,779	9,507	10.8%
- Motor	177,375	171,818	5,557	3.2%
- Property ²	106,043	245,867	(139,824)	-56.9%
- Other Non Life ²	97,984	98,346	(362)	-0.4%
Total insurance contracts (net)	2,162,626	2,294,374	(131,748)	-5.7%
Reinsurance contracts held				
- Life Risk & Savings	519	2,581	(2,062)	-79.9%
- Life & Health	(856)	(1,392)	536	-38.5%
- Motor	(1,872)	(1,760)	(112)	6.4%
- Property ²	(96,552)	(233,704)	137,152	-58.7%
- Other Non Life ²	(47,109)	(50,835)	3,726	-7.3%
Total reinsurance contracts held	(145,871)	(285,110)	139,239	-48.8%
Net Insurance liabilities	2,016,755	2,009,264	7,492	0.4%

- **Life Risk & Savings:** The movement in insurance liabilities is driven primarily by changes in the Liability for Remaining Coverage (LRC), which is the key determinant of overall portfolio dynamics. The variation in the LRC mainly reflects the increase in discount rates applied in the valuation of liabilities, with differentiated effects across product types, while the corresponding impact is recognised in Other Comprehensive Income (OCI).

In particular, as for portfolios with a positive liability position (positive LRC), such as savings products and older-generation health contracts, the rise in discount rates resulted in a decrease in liabilities due to higher discounting effects. Conversely, for portfolios with a negative liability position (negative LRC), primarily newer-generation hospitalisation products (notably generations Θ2 and Θ3), the impact was reversed, leading to an increase in the LRC. These two opposing effects largely offset one another, resulting in a limited overall net movement in liabilities for Life & Savings contracts.

- **Unit Linked:** The decrease is attributed to the predefined termination of the old Single Premium products (Ethniki Capital) despite the increase due to new production.
- **Life & Health:** The increase is due to the new production written during the current period as well as the increase in liability for incurred claims.
- **Motor:** The increase in the liabilities due to the new production is partially offset by the decrease in the liability for incurred claims.
- **Property & Other Non Life:** The reduction in insurance liabilities gross of reinsurance is primarily driven by lower fully reinsured outstanding claims (fronting). As a result, reinsurance receivables decline proportionally, confirming that the movement is symmetrical between the gross liability position and the reinsured share. Accordingly, the impact at a net level (insurance liabilities net of reinsurance) is minimal and does not materially affect shareholders' equity.

Store of Future Profit

	2025	2024	Change	% change
Insurance contracts issued				
Life Risk & Savings	556,722	558,729	(2,007)	-0.4%
Participating	30,371	21,003	9,368	44.6%
Total CSM	587,093	579,733	7,361	1.3%
RA	92,168	90,764	(1,404)	-1.5%
Total Store of Future Profit	679,261	670,496	8,765	1.3%

The change in the contractual service margin is primarily attributed to the increase in the valuation of direct-participation contracts, as well as to the profitability generated from new business (new business CSM).

¹ Includes health riders, if applicable

² Grouped as "Other non-life" in the Financial Statements



Investment Contract Liabilities

	2025	2024	Change	% change
Investment contract Liabilities				
Group investment contracts	258,211	259,942	(1,731)	-0.7%
Investment contracts to individuals	750,762	770,186	(19,424)	-2.5%
Total investment contract liabilities	1,008,973	1,030,128	(21,155)	-2.1%

Group investment contracts include DAF policies, that remained at the same level as in 2024.

Investment contracts to individuals constitute a closed portfolio, reaching gradually their maturity.

7.5 IFRS Equity and Solvency Capital

Total equity for the Company on 31.12.2025 amounted to €341 million, decreased by €32m compared to 31.12.2024. The main reason of the decrease was the losses recognised directly in OCI, both from bonds measured at FVOCI (€43m) as well as the insurance and reinsurance finance expenses also recorded in OCI (€37m), which was partially offset by the 2025 profit after tax (€47 million).

The Solvency II ratio decreased by 11 percentage points in 2025 compared to 2024, mainly due to a €38.6m reduction in eligible own funds, which was partially offset by a €2.8m decrease in capital requirements. For further information, please refer to note 4.10 in the Financial Statements.

The €38.6m decrease in SII eligible own funds between 2024 and 2025 was mainly attributed to a(n):

- €48.9m increase resulting from economic assumptions, reflecting the valuation of assets taking into account the impact of the interest rate curve on insurance liabilities.

In particular:

- €39m decrease from investment assets, mainly driven by the yield curve effect (€127m), which was partially offset by the positive effect of credit spreads (€66.1m) and valuation of listed equities (€21.9m),
- €14.2m decrease due to the revaluation of real estate assets,
- €102.1m increase from the revaluation of insurance liabilities, primarily driven by the yield curve effect,
- €39.7m decrease resulting from updated actuarial assumptions, (morbidity, per policy expense etc).
- €12.9m decrease due to amortisation of the transitional measure for technical provisions,
- €1.4m decrease of Tier III Eligible Own Funds due to the reduction of Solvency Capital Requirements,
- €8.9m decrease from gains/losses on participations,
- with the remaining reduction primarily linked to regulatory eligibility considerations.

The €2.8 m reduction in capital requirements was primarily driven by the following:

- €2.2m reduction in market risk, primarily attributable to a decline in equity and property risk, partially offset by an increase in interest rate risk,
- €10.4m increase in Non-Life underwriting risk, resulting from an increase in catastrophe risk,
- €7.6m increase in life underwriting risk, mainly due to a significant increase in lapse risk, largely offset by a €7.4m decrease in health underwriting risk as a result of higher discount rates,
- €7.4m decrease in health underwriting risk due to the increase in discount rates,
- €6.3m decrease in credit risk mainly due to the reduction of receivables from reinsurers and other receivables,
- €3.1m decrease due to diversification,
- €1.8m decrease due to operational risk.



7.6 Group structure

7.6.1 Shareholder changes

In November 2025, Piraeus Financial Holdings S.A concluded the acquisition of the total shares (percentage 100%) of the parent Company of Ethniki Insurance, “Ethniki Holdings S.à.r.l.”, from CVC Capital Partners Fund VII and National Bank of Greece, becoming the sole shareholder of Ethniki Asfalistiki.

7.6.2 Subsidiaries

In September 2025, Ethniki Asfalistiki completed the acquisition of a 55% majority stake in Elyze S.A. and Elyze Brokers S.A., leading insurance distribution companies being active across all insurance lines in Greece.

7.6.3 Network

Ethniki Asfalistiki

The Company conducts its business throughout Greece via its Sales Network, which comprises of 112 Sales Offices with 1,407 Tied Agents, 1,065 Insurance Agents and 136 Brokers. The network is supported by 6 branches located in Athens, Corinth, Patras, Chania, Rhodes and Thessaloniki. The Company’s products are also available via the extensive network of National Bank of Greece Branches, as well as through online selling.



8. Our Risks & Risk Management

Risk Management Framework

The Company, recognising its exposure to various risks and the importance of effective risk management, has established a comprehensive risk management system supported by an appropriate governance framework, with the aim of preventing and/or mitigating potential losses. As of 31.12.2025, this system complies with all relevant regulatory requirements.

The risk management system and the organisational framework are summarized below:

The Risk Management Governance Framework comprises of:

- the **Board of Directors** (“BoD”) that defines the risk appetite and the overall risk tolerance levels and approves the Risk Management Strategy and related Risk Management Policies,
- the **Board Risk Committee** that supports the BoD in establishing, maintaining, regularly evaluating, and enhancing the risk management framework.
- the **Risk Management Division** that supports BoD and Management to establish an efficient risk management system and to periodically evaluate its effective operation. It monitors the risk profile against the risk appetite and submits relevant reports to the Board Risk Committee and to the BoD, and
- The **Asset – Liability Committee** (ALCO) that is responsible for developing and executing asset and liability management strategies, considering market conditions and risk limits. It also serves as the main forum for discussing related financial and liquidity matters.

The Risk Management System includes:

- the **Risk Management Strategy**: outlines the Company's risk appetite, governance, key risk categories, and related policies. Integrated into the business, it aligns with strategic planning and capital management through the ORSA (Own Risk and Solvency Assessment) process. It also serves as the foundation for developing detailed risk policies, defining principles, procedures, and responsibilities within the risk management framework.
- the **Risk Management Policies**: are designed and implemented in line with the overall risk strategy. They outline key principles, methods, and procedures for identifying, assessing, managing, monitoring, and reporting individual risks. Their goal is to ensure all stakeholders manage risks consistently within a standardised framework aligned with the Company's objectives, risk strategy, and appetite.
- the **Risk Management & Reporting processes**: derived from all related Policies that are integrated in the organisation's procedures and in the decision-making. These processes identify, assess, manage and monitor risks, involving all relevant stakeholders in the risk management activities, leading to the creation and regular updating of a Risk Register.

- the **Own Risk and Solvency Assessment** ("ORSA") **process**: evaluates the Company's solvency on an ongoing basis and forms a core component of the risk management system. It is closely aligned with the Company's strategy and business planning, focusing on identifying and assessing all significant current and emerging risks arising from the business plan and operating environment.

The Risk Management System is supported by the existence of an appropriate “Risk Culture”.

Risk culture refers to the behaviours of individuals and Company’s in an organisation that shape how risks are identified, understood, discussed, and addressed. It plays a key role in the day-to-day decision-making and is crucial to effective risk management. The Company promotes a strong and consistent risk culture by adhering to regulations, applying sound business practices, and integrating risk management across all operations and management levels. Its strategy, policies, and procedures help establish and reinforce this culture.

Risk Profile

Risk management is key to the Company's operations, ensuring customer satisfaction and providing a stable foundation for generating quality returns for its shareholder. This requires balancing risks and expected returns.

In this regard, the Group recognises the following risks:

Insurance Risk	Market Risk	Credit Risk	Liquidity Risk	Operational Risk
Asset-Liability Mismatch Risk	Concentration Risk	Reputation Risk	Strategic Risk	Sustainability Risk

The Company uses various risk mitigation techniques tailored to the type, level, and tolerance of each risk. Key approaches include:

- Monitoring risks against established tolerance and early warning limits.
- Adopting a conservative investment profile and diversifying the portfolio with set limits.
- Entering reinsurance agreements with reputable reinsurers.
- Monitoring the matching of insurance liabilities and assets, ensuring adequate liquidity.
- Setting and tracking time limits for receivables collection.
- Implementing risk and control self-assessment and analysing operational risk incidents.
- Developing and tracking action plans to restore risks within acceptable limits as per the risk appetite.



The Company continuously evaluates the broader economic environment, monitors climate-related risks, and considers their potential implications, ensuring that timely and appropriate measures are implemented to mitigate emerging risks effectively. The Company has identified the following major risks to which it may be exposed:

Market volatility

The Company faces significant risks from market volatility, primarily due to investment and reinvestment risks related to fluctuations in interest rates, particularly those influenced by the European Central Bank (ECB), as well as changes in bond and equity prices affecting its asset portfolio. A large portion of the Company's investments is in fixed income instruments, making it sensitive to interest rate changes and market fluctuations.

To manage these risks, the Company uses a robust risk management framework, including risk metrics, scenario analysis, liquidity monitoring, and stress testing. It actively manages liquidity through cash flow forecasting and high-quality liquid asset reserves, ensuring the ability to meet obligations even in adverse conditions. Asset-liability management (ALM) focuses on aligning asset and liability durations and reducing interest rate sensitivity. The Company's solvency is regularly assessed through stress testing, ensuring regulatory compliance, capital adequacy, and financial resilience.

Pricing Adequacy and Indexation Risk – Long-Term Health Portfolio

The Company is exposed to pricing adequacy risk in its long-term health portfolio, where contractual characteristics and market conditions may limit the ability to fully adjust premiums in line with evolving claims experience, medical inflation and morbidity trends. If premium increases do not sufficiently reflect underlying cost developments, this may lead to sustained underwriting losses and deterioration in loss ratios over time.

To mitigate this risk, Management has developed a number of strategic cost containment initiatives aimed at enhancing the long-term sustainability of the portfolio. These initiatives focus primarily on:

- strengthening claims control mechanisms to identify and reduce overcharging, fraud and abuse;
- reviewing and renegotiating agreements with hospitals and healthcare providers to improve commercial terms; and
- assessing additional cost containment actions targeting morbidity, expense and medical inflation trends.

The implementation of these measures is expected to be gradual and subject to operational and market considerations. The portfolio's performance and pricing adequacy are monitored on a regular basis through actuarial experience analysis and forward-looking projections.

Insurance Risk

Insurance risk arises from contractual obligations of the Company to pay claims under insurance policies. Insurance risk includes uncertainties related to claim frequency, severity and timing of insured events.

Insurance risk is defined as the risk for profit and capital that arises from losses or adverse changes in the value of insurance liabilities due to inappropriate pricing and/or reserving assumptions. This category includes non-life, life, and health insurance risk. The main sources of insurance risks are found in deviations from expected levels relating to claims, expenses and concentration (geographic, risk, product, etc.), from the inadequate pricing or unexpected changes of macro- and micro- economic parameters, such as interest rates, inflation, unemployment, disposable income (that affects portfolio retention rates) as well as from unexpected changes in biometric parameters such as mortality, disability and morbidity.

Exposure to insurance risk is mitigated by implementing appropriate underwriting procedures and reinsurance policies, as well as internal rules of operation embedded in an integrated risk management framework. Moreover, insurance policies pricing is based on assumptions and statistical surveys of the Company, Company's own empirical data, taking also into account prevailing market conditions and trends.

Market Risk

Market risk is defined as the risk for profit and capital that arises, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets or liabilities.

The key market risks to which the Company is exposed are:

- Interest rate risk that arises from changes in the value of assets and liabilities due to changes in the interest rate curves or interest rate volatility.
- Equity risk that arises from changes in the value of assets, liabilities and financial instruments due to changes in the level or volatility of market prices of equity, equity indexes and their derivatives, the Company has invested in.
- Spread risk arising from the volatility of credit spreads, reflecting the issuer's creditworthiness of the bonds the Company holds.

To effectively manage and reduce its market risk exposure, the Company implements several key measures, including:

- Aligning its investment policy with its business strategy and defined risk limits.
- Setting operational and exposure limits to prevent excessive concentration in specific assets or issuers, incorporating tools like Value at Risk (VaR).
- Defining approved financial instruments and procedures for introducing new ones.



- Using hedging strategies to mitigate investment risk, with regular assessments of their effectiveness.
- Maintaining systems to identify, monitor, evaluate, and report investment risks, enabling timely corrective actions. Oversight is provided by the ALM and Board Risk Committees.

Credit Risk

Credit risk is defined as the risk for profit and capital that arises from fluctuations in the credit standing of counterparties and debtors to whom the Company is exposed, or from the failure of counterparties or debtors to meet their obligations.

The main counterparties to which the Company is exposed for credit risk are the issuers of financial instruments and reinsurers, who may be unable to cover their share of insurance claims already paid to beneficiaries, policyholders, who may be unable to pay insurance premiums due, and other debtors of the Company.

The Company's policy is to enter into transactions with counterparties who fulfil high standards of creditworthiness and to effectively manage the credit exposure of debtors by taking both proactive and reactive measures.

Liquidity Risk

Liquidity risk is defined as the risk for profit and capital that results from the inability of the Company to fulfil its obligations when they become due.

The Company manages liquidity risk by monitoring its cash position on an ongoing basis and conducting cash planning. It calculates and monitors the expected cash flows and takes the appropriate measures to maintain an adequate level of cash and highly liquid assets to cover cash needs.

Operational Risk

Operational risk is defined as the risk of loss arising from inadequate or inappropriate internal processes, IT and other operating systems, human resources, or from adverse external events.

The sub-categories of operational risk which are assessed, are the following:

- Internal Fraud,
- External Fraud,
- Employment Practices and Workplace Safety,
- Clients, Products and Business Practices,
- Damage to Physical Assets,
- Business Disruption and System Failures, and
- Execution, Delivery & Process Management.

The Company, recognising its exposure to operational risks, has established an operational risk management framework to detect, assess, measure, record, mitigate and where possible prevent operational risk. When the effect of operational risk is, or estimated, beyond the approved risk appetite, action plans are developed to minimise operational risk by enhancing the control environment.

Assets - Liabilities Mismatch (ALM) Risk

Asset - liability mismatch risk is defined as the risk for profit and capital that arises from the structure of assets and liabilities, as well as from off-balance sheet items. The structure may concern the maturity mismatch, the interest rates, the repricing frequency, currencies, as well as the levels and the time structure of the cash flows.

The Company regularly monitors the relationship between its assets and liabilities and employs various techniques—such as sensitivity analyses and interest rate risk assessments—to measure ALM risk and ensure that any mismatches remain within acceptable levels.

Concentration Risk

Concentration risk is defined as the potential adverse impact on profitability and capital arising from a lack of dispersion—namely, a significant concentration of assets or insurance liabilities. This risk is assessed by considering factors such as economic sector exposure, geographical distribution, counterparty concentration, and groups of connected counterparties.

The Company manages concentration risk through policies for the various risks it assumes, like market risk, insurance risk, credit risk, and operational risk. It diversifies the insurance contract portfolio and investments and limits exposures to individual counterparties.

Other Risks

The Company, besides the aforementioned risks, has recognised and adopted risk management processes for the following risks:

Reputational risk

Reputational risk concerns the possibility of losses due to the formation of negative public perception for the Company among clients, counterparties, shareholders, investors or supervisory authorities.

Reputation risk is assessed in the Company's strategy formulation, risk appetite setting, capital management and ORSA processes to ensure that it is thoroughly understood and related risks are identified promptly, quantified appropriately, monitored continuously and controlled/mitigated satisfactorily.

Strategic risk

Strategic risk concerns the possibility of losses from changes in the business environment and ineffective response to these changes, poor business decisions, or inadequate implementation of these decisions.

To mitigate strategic risk, the Company has robust strategic planning and monitoring processes in place and constantly assesses developments in its business environment so that risks to the strategy are identified and assessed properly, controlled and monitored satisfactorily.



The Company recognises that it is subject to sustainability risks and at the same time is committed to operating in a socially responsible manner. Sustainability risks could have an actual or potentially material adverse effect on the value of the assets, liabilities, the reputation and, consequently, the financial robustness of the Company.

The Company recognizes and assesses sustainability and where applicable climate change-related risks, monitors the relevant regulatory developments and manages relevant exposures under its wider risk management framework by integrating "ESG" aspects.

Details of our risk exposures are outlined in Note 4 of the Financial Statements.

9. Board Viability Statement

The time period that the Board of Directors has considered in evaluating the appropriateness of the going concern basis in preparing the financial statements for 2025 is a period of twelve (12) months from the date of approval of these financial statements ('the assessment period').

In making the assessment, the Directors have considered a wide range of information relating to present and future conditions, including the performance of the Company's business, solvency and liquidity, future projections of profitability, cash flows, capital requirements and capital resources together with a range of other factors such as the economic outlook for the Greek economy and the current global macroeconomic and geopolitical environment.

The matters of primary considerations by the Directors are set out below:

Capital: The Company has developed capital plans under base and stress scenarios on a three year basis, and the Directors believe that the Company has sufficient capital to meet its regulatory capital requirements throughout the period of assessment.

A three-year time horizon has been deemed an appropriate period for the assessment as it aligns to management's 2026-2028 business plan and to the period for which the Company establishes its internal and external targets.

Solvency and liquidity: The Directors have considered the Company's liquidity position and are satisfied that the Company continues to maintain strong solvency and liquidity positions throughout the period of assessment.

Conclusion: On the basis of the above, the Board is satisfied that the Company has adequate resources to continue its operations for the next 12 months from the date of this report and meet liabilities as they fall due. No material uncertainties that may cast significant doubt on the ability of the Company to continue as a going concern have been identified. The Directors therefore consider it appropriate to continue to adopt the going concern basis in preparing the financial statements for the year ended 31 December 2025.

10. Sustainability Statement

Statement on exemption from the preparation of a standalone Sustainability Statement

"The Ethniki, Hellenic General Insurance Company S.A." (hereinafter "Ethniki Insurance" or the "Company"), pursuant to Law 4548/2018, as amended and currently in force - including, inter alia, the amendments of Law 5164/2024, implementing Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive – "CSRD" and Law 5255/2025- publishes the following Statement:

The Sustainability Statement for the fiscal year 2025 has been prepared on a consolidated basis for Piraeus Financial Holdings Group S.A. (hereinafter "Piraeus Group"), which includes the ultimate parent Company of Ethniki Insurance, Piraeus Bank S.A., hereinafter "Piraeus Bank". Specifically, Ethniki Insurance is both:

- a parent undertaking of two subsidiaries, namely, a) ELYZE Anonymi Etaireia Asfalistikon Praktoron kai Syntoniston Asfalistikon Praktoron S.A. and b) ELYZE Mesites Asfaliseon S.A., hereinafter jointly referred to as the "Subsidiaries" and
- a subsidiary undertaking of its ultimate parent Company, Piraeus Bank, member of Piraeus Group, which is incorporated and domiciled in Greece with its registered office at 4 Amerikis Str., Postal Code: 105 64, Athens.

In accordance with Article 57 of Law 5255/2025, which amended Article 154 of Law 4548/2018, and is currently in force, the Company has made use of the exemptions provided therein, as it and its Subsidiaries are included in the consolidated Sustainability Statement of Piraeus Group, which is prepared in accordance with the applicable provisions of European and national legislative framework on sustainability and the European Sustainability Reporting Standards (ESRS).

The consolidated Sustainability Statement of Piraeus Group, together with the related Independent Auditor's Limited Assurance Report, is available at:

https://www.piraeusgroup.gr/-/jssmedia/Com/2025/Files/Investors/Financials/Financial-Results/12M/Piraeus-Bank-SA_Annual-Financial-Report-2025-of-PB.pdf?sc_lang=en

Accordingly, the Company is exempt from the obligations set out in Articles 151 and 154 of Law 4548/2018, as amended and currently in force, and therefore confirms that it has not prepared either a standalone or a consolidated Sustainability Statement for the financial year 2025, as its sustainability and EU Taxonomy disclosures are covered at group level in accordance with the applicable EU and national regulatory framework on sustainability reporting.

The Chairman of the Board

George Kotsalos



2025

Independent Auditors' Reports

As at and for the year ended 31 December 2025

TRUE TRANSLATION FROM THE ORIGINAL IN THE GREEK LANGUAGE



INDEPENDENT AUDITOR'S REPORT

To the Shareholders of “THE ETHNIKI” Hellenic General Insurance Company S.A.

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of “THE ETHNIKI” Hellenic General Insurance Company S.A. (the Company), which comprise the statement of financial position as at 31 December 2025, the statement of income, statements of comprehensive income, changes in equity and cash flows for the year then ended and the notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company as at 31 December 2025, its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs), as endorsed by the European Union.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISA) as they have been incorporated into the Greek legislation. Our responsibilities under those standards are further described in the “Auditor’s Responsibilities for the Audit of the Financial Statements” section of our report. We have been independent of the Company during the whole period of our appointment, in accordance with the International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants, as applied in audits of financial statements of public interest entities and the ethical requirements in Greece, relevant to the audit of the financial statements. We have fulfilled our ethical requirements in accordance with the applicable legislation and the abovementioned Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

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

Key audit matters	How our audit addressed the Key audit matters
Measurement of insurance contract liabilities for the remaining coverage period	
The Company’s net insurance liability (“insurance liabilities”) for the Life Risk & Savings contracts measured under the General Measurement Model ("GMM") and for the Direct Participating contracts measured under the Variable Fee Approach (“VFA”) include liability for remaining coverage ("LRC"). This liability, as this is detailed documented in the Note 31 of the financial statements, amount to €1,522 million (2024: €1,521 million) and represent 43% of the Company's total liabilities. The insurance liabilities for remaining coverage include the estimate of future cashflows, the adjustment for non-financial risks (RA) and the contractual service margin (CSM). We considered the estimation of insurance contract liabilities for remaining coverage to be a key audit matter as this estimation is based on the use of complex calculation models and the use of complex analysis that involves the exercise of significant judgments and estimates. These estimates and judgments involve inherent risk due to the high level of subjectivity and complexity associated with the determination of assumptions. The estimates that have been determined as significant are: ▪ Morbidity, ▪ Health premium increase, ▪ Lapse, ▪ Disability, ▪ Morbidity, ▪ Expense and ▪ Discount Yield Curve curve used to discount future cash flows The adjustment for non-financial risk (RA), which is measured based on assumptions regarding the Company's confidence level for the risk factors associated with the present value of future cash flows and a value-at-risk approach, which is the maximum loss within the specified confidence level. The Contractual Service Margin is determined based on the coverage units as they have been determined by Management. Management has provided further information regarding the estimation of insurance liabilities in notes 2.9 "Insurance Contracts (IFRS 17)", 3.1 "Estimates and assumptions in the measurement of insurance contracts", 4.2 "Insurance Risk" and 31 "Receivables and Liabilities from Insurance Contracts and Reinsurance Contracts"	Based on our assessment of audit risk and following a risk-based approach, we evaluated the estimation of the insurance liabilities for remaining coverage for the Life Risk & Savings insurance contracts that are measured using the General Measurement Model (“GMM”) and for the Direct Participating contracts measured under the Variable fee Approach (“VFA”) and performed, among others, the following audit procedures: We assessed the design and implementation of relevant internal control procedures for the estimation of these insurance liabilities, including internal control procedures relating to: ▪ The accuracy and completeness of the data used in the actuarial models. ▪ The significant assumptions used in the actuarial models. With the support of our specialist experts (actuaries) we performed the following substantive procedures: ▪ We assessed the appropriateness of the methodology used to determine the significant assumptions and examined that the corresponding methodology has been applied appropriately. ▪ We examined the completeness and on a sample basis the accuracy of the data used to determine the significant assumptions. ▪ We assessed the appropriateness of the methodology used to estimate future cash flows and examined on a sample basis the future cash flows through independent recalculation of the cash flow models. ▪ We assessed the appropriateness of the methodology used to determine the adjustment for non-financial risk, examined the completeness and on a sample basis the accuracy of the underlying data used in the calculation, and examined the corresponding calculation of this adjustment. ▪ We assessed the appropriateness of the methodology used to determine the coverage units used to measure the Contractual Service Margin and examined on a sample basis the calculation and measurement of the Contractual Service Margin. We assessed the completeness and accuracy of the relevant disclosures in accordance with the provisions of the applicable accounting standard.

Key audit matters	How our audit addressed the Key audit matters
Measurement of insurance contract liabilities for incurred claims	
Insurance liabilities for incurred claims, as described in more detail in Note 31 of the Financial Statements, amounted to €554 million as at 31 December 2025 (31.12.2024: €693 million). The insurance liabilities for incurred claims include the estimate of future cashflows and the adjustment for non-financial risks (RA). We considered the estimation of insurance liabilities for incurred claims as a key audit matter, as the estimate involves the use of complex computer models and the use of significant assumptions and judgements. These estimates and judgments involve inherent risk due to the high level of subjectivity and complexity associated with their determination of: ▪ The methodology for estimating the claim development factor for claims incurred in relation to insurance activities in the Motor Liability, Fire, General Liability and Health business lines ("Business Lines") and which is used to calculate future cash flows for incurred claims and is determined based on empirical data as well as the use of statistical methods, ▪ Discount Yield Curve used for the discounting of future cash flows. The adjustment for non-financial risk, which is measured based on assumptions regarding the Company's confidence level for risk factors associated with the present value of future cash flows and a value-at-risk approach, which is the maximum within the specified confidence level. Management has provided further information regarding the estimation of insurance liabilities in notes 2.9 "Insurance Contracts (IFRS 17)", 3.1 "Estimates and assumptions in the measurement of insurance contracts", 4.2 "Insurance Risk" and 31 "Receivables and Liabilities from Insurance Contracts and Reinsurance Contracts".	Based on our assessment of audit risk and following a risk-based approach, we evaluated the estimation of insurance liabilities for incurred claims and performed, among others, the following audit procedures: We assessed the design and implementation of relevant internal control procedures for the estimation of these insurance liabilities, including internal control procedures relating to: ▪ The determination of the claim development factor used in forecasting future cash outflows for the specific business lines ▪ The accuracy and completeness of the data used to determine the development factor for the specific business lines. With the support of our specialist experts (actuaries) we performed the following substantive procedures: ▪ We assessed, for the specific business lines, the appropriateness of the methodology used to estimate the claim development factor for calculating future cash flows for incurred claims. ▪ We examined the completeness and accuracy of the data used to estimate the development factor that was used to calculate future cash flows for incurred claims. ▪ We examined, for the specific business lines, the accuracy of the calculation of future cash flows for incurred claims. ▪ We assessed the appropriateness of the methodology used to determine the interest rate curve used to discount the future cash flows for incurred claims as well as its correct application. ▪ We assessed the appropriateness of the methodology used to determine the adjustment for non-financial risk, examined the completeness and on a sample basis the accuracy of the underlying data used in the calculation, and examined the corresponding calculation of this adjustment. We assessed the completeness and accuracy of the relevant disclosures in accordance with the provisions of the applicable accounting standard.

Other matters

The financial statements of Company for the preceding year ended 31 December 2024 were audited by another audit firm. For that year, the Certified Public Accountant issued an audit report dated 6th of June 2025, expressing an unmodified opinion.

Other Information

Management is responsible for the other information. The other information is included in the Board of Directors' Report, referred to in the section "Report on Other Legal and Regulatory Requirements" and the Statement by the Members of the Board of Directors, but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement in this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with IFRSs, as endorsed by the European Union, and for such internal control as Management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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

The Audit Committee (article 44 of Law 4449/2017) of the Company is responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

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

As part of an audit in accordance with ISAs, as these have been incorporated into Greek legislation, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

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

Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current year and are therefore the key audit matters.



Report on Other Legal and Regulatory Requirements

1. Board of Directors' Report

Taking into consideration that Management is responsible for the preparation of the Board of Directors' Report, according to the requirements of paragraph 1, sub paragraphs aa), ab) and b) of article 154C of Law 4548/2018, we note the following:

- a) In our opinion, the Board of Directors' report has been prepared in accordance with the applicable legal requirements of article 150 of Law 4548/2018 and its content is consistent with the acCompanying financial statements for the year ended 31 December 2025.
- b) Based on the knowledge we obtained during our audit of the “THE ETHNIKI” Hellenic General Insurance Company S.A. and its environment, we have not identified any material inconsistencies in the Board of Directors' Report.

2. Additional Report to the Audit Committee

Our audit opinion on the acCompanying financial statements is consistent with the additional report to the Audit Committee of the Company referred to in Article 11 of the European Union (EU) Regulation 537/2014.

3. Non-Audit Services

We have not provided to the Company any prohibited non-audit services referred to in Article 5 of EU Regulation 537/2014.

The permitted non-audit services provided to the Company, during the year ended 31 December 2025 are disclosed in note 37 of the acCompanying financial statements.

4. Appointment

We were appointed for the first time as the Company's Statutory Auditors pursuant to the decision of the Annual Ordinary General Meeting of the shareholders dated 04/08/2025.

Athens, 08 April 2026

The Certified Public Accountant

Apostolos Kokkinelis

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This document has been prepared by Deloitte Certified Public Accountants Societe Anonyme.
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2025

Annual Financial Statements

For the year ended 31 December 2025



Contents

Statement of Total Comprehensive Income	35	Note 4	Insurance and Financial Risk Management	62
Statement of Financial Position	37	4.1	Risk management framework	62
Statement of Changes in Equity	38	4.2	Insurance Risk	63
Statement of Cash Flows	39	4.3	Credit risk	69
Note 1	General Information	4.4	Liquidity risk	72
Note 2	Summary of Material Accounting Principles & Policies	4.5	Market risk	75
2.1	Basis of preparation of Financial Statements	4.6	Concentration risk	76
2.2	Going concern	4.7	Operational risk	76
2.3	Adoption of International Financial Reporting Standards (IFRS)	4.8	Strategic risk	76
2.4	Exemption from Presenting Consolidated Financial Statements	4.9	Reputation risk	76
2.5	Business combinations	4.10	Capital management	76
2.6	Foreign currency translations	4.11	Sustainability risks	77
2.7	Financial instruments	Note 5	Insurance Revenue and Expense	77
2.8	Fair value of financial instruments	Note 6	Net Financial Result	79
2.9	Insurance contracts (IFRS 17)	Note 7	Net Investment Income	83
2.10	Sale and repurchase agreements	Note 8	Change In Impairment of Financial Assets	88
2.11	Property and equipment, including right of use assets (ROU)	Note 9	Other Expenses	90
2.12	Investment property	Note 10	Other Income	91
2.13	Goodwill, software, and other intangible assets	Note 11	Income Tax Expense	91
2.14	Leases	Note 12	Property and Equipment	92
2.15	Cash and cash equivalents	Note 13	Assets Held for Sale	93
2.16	Provisions	Note 14	Investment Property	93
2.17	Financial guarantee contracts	Note 15	Intangible Assets	94
2.18	Employee benefits	Note 16	Investment In Subsidiaries	94
2.19	Income taxes	Note 17	Deferred Tax Assets / Liabilities	95
2.20	Share capital	Note 18	Breakdown of Financial Assets and Liabilities	96
2.21	Assets and liabilities held for sale	Note 19	Financial Assets at Amortized Cost by Product Line	97
2.22	Related party transactions	Note 20	Financial Assets at FVOCI by Product Line	98
2.23	Revenue recognition	Note 21	Financial Assets at FVTPL by Product Line	99
2.24	Off-setting	Note 22	Portfolio Analysis by Type of Interest Rate	100
2.25	Share-based payments	Note 23	Other Receivables	101
Note 3	Management Critical Accounting Judgements and Estimates	Note 24	Cash and Cash Equivalents	101
3.1	Estimates and Assumptions used in the measurement of insurance contracts	Note 25	Share Capital	102
3.2	Methods used to measure the risk adjustment for non-financial risk			
3.3	Contractual Service Margin: Determination of coverage units			
3.4	Provision for income tax			
3.5	Deferred tax			
3.6	Impairment loss allowance on financial assets			
3.7	Impairment of property, plant and equipment and investment property			
3.8	Fair value of financial instruments			
3.9	Cost of defined benefit plans			



Note 26	Reserves	102
Note 27	Retained Earnings	103
Note 28	Investment Contract Liabilities	103
Note 29	Other Liabilities	103
Note 30	Financial Liabilities	104
Note 31	Insurance & Reinsurance Contract Assets & Liabilities	104
31.1	Breakdown of portfolios	104
31.2	Reconciliation of the liability for remaining coverage and liability for incurred claims (LIC)	105
31.3	Movement analysis of the net assets or liability for reinsurance contracts held	115
31.4	Reconciliation of the measurement component of insurance contract balances	123
31.5	Expected recognition of the contractual service margin (CSM)	127
31.6	Impacts on current period	127
31.7	The components of new business - insurance contracts issued and reinsurance contacts held	129
Note 32	Employee Benefit Obligations	130
Note 33	Share Option Plan	131
Note 34	Related Party Disclosure	132
Note 35	Contingent Liabilities	132
Note 36	Post Balance Sheet Events	133
Note 37	Audit Fees	133
Note 38	Restatements & Reclassifications	133



Statement of Total Comprehensive Income

		01/01/2025 - 31/12/2025	01/01/2024 - 31/12/2024
	Note	(€ thousands)	
Insurance revenue	5	656,463	572,515
Insurance service expenses	5	(526,006)	(654,421)
Insurance service result before reinsurance contracts held		130,457	(81,906)
Allocation of reinsurance premiums		(118,989)	(97,254)
Amounts recoverable from reinsurers for incurred claims		(6,724)	194,366
Net income/(expense) from reinsurance contracts held		(125,713)	97,112
Insurance service result		4,744	15,206
Interest revenue from financial investments not measured at FVTPL	7	53,821	49,551
Other interest and similar income	7	11,530	18,392
Net realised gains/(losses) and change in fair value of FVTPL financial investments	7	48,485	51,406
Net gains/(losses) on investments in debt securities measured at FVTOCI reclassified to profit or loss on disposal	7	(94)	2,012
Net gains/ (losses) on the derecognition of financial assets measured at AC	7	118	35
Impairment of financial assets	8	944	(27)
Interest expense on financial liabilities	7	(13,466)	(14,244)
Net result from investment contracts	7	(16,849)	(17,585)
Net investment income		84,489	89,540
Insurance finance (expense)/income for insurance contracts issued	6	(39,257)	(40,186)
Reinsurance finance (expense)/income for reinsurance contracts held	6	5,809	4,089
Net insurance finance (expense)/income		(33,448)	(36,097)
Net insurance and investment result		55,785	68,649
Other expenses	9	(38,271)	(57,353)
Other incomes	10	30,500	3,516
Profit/ (Loss) before tax		48,014	14,812
Income tax expense	11	(534)	(3,943)
Profit/ (Loss), net of tax		47,480	10,869



Statement of Total Comprehensive Income

(Continued)

		01/01/2025 - 31/12/2025	01/01/2024 - 31/12/2024
	Note	(€ thousands)	
Other comprehensive income (OCI):			
Items that may be reclassified to profit or loss in subsequent periods:			
Net gains/(losses) on investments measured at FVTOCI	7 ,26	(55.732)	1,679
Net gains/(losses) on investments in debt securities measured at FVTOCI reclassified to profit or loss on disposal	7 ,26	94	(2,012)
Insurance/ Reinsurance finance reserve	31	(47,173)	(8,739)
Other	26 ,33	(6,182)	2,124
Income tax relating to these items		22,617	2,029
Total		(86.376)	(4,919)
Items not to be reclassified to profit or loss in subsequent periods:			
Net profits/(losses) of equity instruments measured at fair value through other comprehensive income	7 ,26	-	(151)
Remeasurement of defined benefit obligations	33	2,555	(4,062)
Income tax relating to these items		(562)	894
Total		1.993	(3.319)
Other comprehensive income, net of tax		(84.383)	(8.238)
Total comprehensive income, net of tax		(36.903)	2.631
Profit /(loss), net of tax, attributable to:			
- the Company		47.480	10.869
- Non-controlling interests		-	-
Total comprehensive income, net of tax, attributable to:			
- the Company		(36.903)	2.631
- Non-controlling interests		-	-

The explanatory notes on pages 39 to 132 form an integral part of these financial statements.

Athens, 3 April 2026

The Chairman of the Board	The Chief Executive Officer	The Chief Financial Officer	The Chief Actuary	The Chief Accountant
Georgios Kotsalos ID A01948070	Dimitrios Mazarakis ID AI569932	Efstratios Petrou ID No AZ 136360	Michalis Prinarakis ID No A00088348	Georgios L. Gennimatas Class A License No. 91312



Statement Of Financial Position

		31/12/2025	31/12/2024
ASSETS	Note	(€ thousands)	
Property and equipment	12	95,798	102,340
Investment property	14	10,545	23,506
Intangible assets	15	22,121	18,411
Assets held for sale	13	28,014	18,714
Investment in subsidiaries	16	2,067	-
Financial assets	18, 19, 20, 21	3,251,360	3,370,222
Insurance contract assets	31	751	32,918
Reinsurance contract assets	31	147,452	289,146
Other receivables	23	71,437	17,426
Deferred tax assets	17	203,314	184,348
Current income tax receivables		7,423	-
Cash and cash equivalents	24	27,284	29,851
Total Assets		3,867,566	4,086,881
EQUITY AND LIABILITIES			
Shareholders' Equity			
Share capital - paid in	25	235,221	235,221
Share premium account		33,456	33,456
Reserves	26	(2,217)	80,669
Retained earnings	27	74,984	24,019
		341,444	373,365
Non-controlling interests		-	-
Total equity		341,444	373,365
Liabilities			
Insurance contract liabilities	31	2,163,377	2,327,291
Reinsurance contract liabilities	31	1,582	4,038
Investment contracts liabilities	28	1,008,973	1,030,128
Other liabilities	29	79,997	70,152
Financial liabilities	30	177,127	177,128
Income tax liabilities		-	5,138
Retirement benefit obligations	32	95,066	99,641
Total liabilities		3,526,121	3,713,516
Total Equity and Liabilities		3,867,565	4,086,881

The explanatory notes on pages 39 to 132 form an integral part of these Financial Statements.

Athens, 3 April 2026

The Chairman of the Board	The Chief Executive Officer	The Chief Financial Officer	The Chief Actuary	The Chief Accountant
Georgios Kotsalos ID No. A01948070	Dimitrios Mazarakis ID No. AI569932	Efstratios Petrou ID No. AZ136360	Michalis Prinarakis ID No. A00088348	Georgios L. Gennimatas Class A License No. 91312



Statement Of Changes In Equity

(€ thousands)

	Share capital	Share premium account	Revaluation reserve for debt securities	Insurance/ reinsurance finance reserve	Retirement benefit obligations	Other reserves	Retained earnings	Total equity
Balance at 01/01/2024	235,221	547,429	(65,819)	117,418	2,313	32,950	(448,952)	420,560
Profit, net of tax	-	-	-	-	-	-	10,870	10,870
Dividend distribution	-	-	-	-	-	-	(49,825)	(49,825)
Transfers	-	(513,973)	-	-	-	2,045	511,928	-
Other comprehensive income, net of tax	-	-	(377)	(6,818)	(3,167)	2,124	-	(8,238)
Balance at 31/12/2024	235,221	33,456	(66,196)	110,600	(854)	37,119	24,021	373,367
Profit, net of tax	-	-	-	-	-	-	47,480	47,480
Dividend distribution	-	-	-	-	-	-	-	-
Transfers	-	-	(80)	-	-	(3,406)	3,486	-
Other comprehensive income, net of tax	-	-	(43,318)	(36,795)	1,993	(1,281)	-	(79,401)
Balance at 31/12/2025	235,221	33,456	(109,594)	73,805	1,139	32,432	74,987	341,446

The explanatory notes on pages 39 to 132 form an integral part of these Financial Statements.



Statement Of Cash Flows

		01/01/2025 - 31/12/2025	01/01/2024- 31/12/2024
	Note	(€ thousands)	
Operating activities			
Insurance revenue or Premiums received		891,561	912,419
Net income/(expense) of reinsurance activities		(61,038)	(21,579)
Claims incurred		(671,595)	(704,292)
Commission expenses		(114,786)	(105,986)
Indirect taxes and fees		(109,089)	(109,816)
Other expenses		(95.401)	(110,702)
Other income		11,086	8,955
Acquisition of investment securities		(621,730)	(1,138,856)
Disposal of investment securities		738,469	1,214,126
Interest, dividends and other investment income	7	55,580	49,729
Purchase of investment property	14	(528)	-
Proceeds from sale of investment property	7, 14, 13	5,450	50,270
Income tax (paid)/ received		(2,155)	6,273
Net cash flows used in operating activities		25.823	50,541
Investing activities			
Purchase of property & equipment, intangible assets	12	(14,299)	(11,906)
Proceeds from sale of property & equipment, intangible assets	12, 10	61	363
Acquisition of subsidiary		(1,100)	(13,487)
Net cash flows used in investing activities		(15,338)	(11,543)
Financing activities			
Dividend distribution	27	-	(38,863)
Net income/(expense) for loans and interests	7, 30	(13,068)	(13,487)
Net cash flows used in financing activities		(13.068)	(52,350)
Net increase/(decrease) in cash and cash equivalents		(2,583)	(13,352)
Cash and cash equivalents at the beginning of period		28,667	42,019
Cash and cash equivalents at the end of period	24	26,084	28,667

The explanatory notes on pages 39 to 132 form an integral part of these Financial Statements.



Note 1: General Information

The “Ethniki”, Hellenic General Insurance Company S.A. (the "Company" or "Ethniki Asfalistiki") is the oldest insurance Company in Greece and has been conducting business continuously for nearly 135 years. It was established on 15 June 1891 and its headquarters are located at Syngrou Ave. 103-105, 11745, Athens (Reg. 12840/05/B/86/20), tel.: +30 210 90 99 000, www.ethnikiasfalistiki.gr. Pursuant to its Articles of Association, the purpose of the Company is to carry out insurance, reinsurance and relevant financial activities for insurance companies under the applicable Greek and EU law and operate in line with the provisions of Greek Corporate Law 4548/2018, as well as Greek Law 4364/2016 for Insurance and Reinsurance business (Solvency II) and the provisions of the legal and regulatory framework governing its operation and activities. The Company offers a full range of retail and corporate insurance services.

The Board of Directors ("BoD") on 31st December 2025 consists of the following members:

Full Name	Position on the BoD
Georgios Kotsalos	Chairman, Independent non-executive member
Dimitrios Mazarakis	Chief Executive Officer, Executive member
Georgios Georgakopoulos	Non-executive member
Theodoros Gnardellis	Non-executive member
Vasileios Koutentakis	Non-executive member
Triantafyllos Lysimachou	Independent non-executive member
Charalambos Margaritis	Non-executive member
Charalambos Mylonas	Independent non-executive member
Despina Xenaki	Independent non-executive member

At the BoD meeting No. 2377/22.12,2025, the Board examined and approved unanimously the consensual termination of three board members, including the chairman and the election of the new members.

The financial statements are subject to the approval of the Annual General Meeting of the shareholders of the Company.

These separate annual Financial Statements were approved by the Board of Directors of the Company on 03.04.2026.

Note 2: Summary of Material Accounting Principles & Policies

2.1 Basis of preparation of Financial Statements

The separate financial statements of the Company for the year ended 31 December 2025 (the “Financial Statements”) have been prepared in accordance with International Financial Reporting Standards (“IFRS”) as endorsed by the European Union (“EU”).

The financial statements have been prepared under the historical cost convention as modified to include the fair valuation of certain financial instruments, insurance and reinsurance contracts at Present Value of Fulfillment Cash Flows, plus Contractual Service Margin.

The accounting principles followed by the Company for the preparation of the annual financial statements are consistent with those described in the published financial statements for the year ended 31.12.2024.

In preparing the financial statements, the Company makes estimates and assumptions that affect the reported amounts of assets, liabilities, revenues and expenses. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Due to the inherent uncertainty involved in estimating the likelihood of future events, actual results could differ from those estimates, which could affect the future reported amounts of assets and liabilities. A description of the critical estimates and judgements applied in the annual financial statements is set out in note 3.

The Company’s presentation currency is the Euro (€) being the functional currency of the Company. Except for as indicated, financial information presented in Euro has been rounded to the nearest thousand.

2.2 Going concern

The time period that the Board of Directors has considered in evaluating the appropriateness of the going concern basis in preparing the financial statements for 2025 is a period of twelve months from the date of approval of these financial statements (‘the assessment period’).

In making the assessment, the Directors have considered a wide range of information relating to present and future conditions, including the performance of the Company’s business, solvency and liquidity, future projections of profitability, cash flows, capital requirements and capital resources together with a range of other factors such as the economic outlook for the Greek economy and the current global macroeconomic and geopolitical environment.

The matters of primary considerations by the Directors are set out below:

Capital

The Company has developed capital plans under base and stress scenarios and the Directors believe that the Company has sufficient capital to meet its regulatory capital requirements throughout the period of assessment.

Solvency and liquidity

The Directors have considered the Company's liquidity position and are satisfied that the Company continues to maintain strong solvency and liquidity positions throughout the period of assessment.



Conclusion

On the basis of the above, the Board is satisfied that the Company as a whole has adequate resources to continue operations for the next 12 months from the date of this report and meet liabilities as they fall due. No material uncertainties that may cast significant doubt on the ability of the Company to continue as a going concern have been identified. The Directors therefore consider it appropriate to continue to adopt the going concern basis in preparing the financial statements for the year ended 31 December 2025.

2.3 Adoption of International Financial Reporting Standards (IFRS)

2.3.1 New standards, amendments and interpretations to existing standards as issued by the International Accounting Standards Board (IASB), endorsed by the EU and adopted by the Company as of 1 January 2025

Amendments effective from 1st January 2025

Amendment to IAS 21: Lack of Exchangeability

Issued by IASB in August 2024. The amendments specify when a currency is exchangeable into another currency and, consequently, when it is not and how an entity determines the exchange rate to apply when a currency is not exchangeable. Additionally, the amendment requires disclosure of information that enables users of financial statements to understand the impact of a currency not being exchangeable.

The above amendment endorsed by the EU did not have a material impact on the Company's financial statements.

2.3.2 New standards and amendments and interpretations to published standards by IASB, endorsed by EU, but not yet adopted by the Company

The following new standards and amendments to existing standards, as issued by the IASB and have been endorsed by the EU, are not yet effective nor have they been early adopted by the Company.

IFRS 18 (new) – Presentation and Disclosure in Financial Statements

Issued by IASB in April 2024, the new standard aims to improve the transparency and comparability of the entities' performance reporting, it has retrospective application and will replace IAS 1 "Presentation of Financial Statements". It sets out general and specific requirements for the presentation and disclosure of information in general purpose financial statements to help ensure they provide relevant information that faithfully represents an entity's assets, liabilities, equity, income, and expense.

Amendments to IFRS 9 and IFRS 7 – Classification and Measurement of Financial Instruments

Issued by IASB in May 2024, the amendments aim to address matters identified post-implementation of the IFRS 9. In particular, the amendments (a) clarify that an entity is allowed to derecognise a financial liability (or part of it) settled before the actual settlement date under specific conditions when using an electronic payment system, (b) provides additional examples regarding the contractual terms which are consistent with a basic lending agreement and enhance the description of non-recourse features and contractually linked instruments, and (c) add new disclosures for equity instruments measured at FVOCI and financial instruments with contingent features.

Amendments to IFRS 9 and IFRS 7 – Contracts Referencing Nature-dependent Electricity

Issued by IASB in December 2024, the amendments aim to enhance the factors an entity shall take under consideration when assessing the own-use exemption of IFRS 9 to contracts to buy and take delivery of renewable electricity for which the source of electricity production is nature-dependent. The amendments further extend to hedge accounting and allow an entity. using a contract for nature-dependent renewable

electricity with specific characteristics as a hedging instrument. Moreover, the amendments introduce disclosure requirements about contracts for nature-dependent electricity with specific characteristics.

Annual Improvements

The following standards have been amended in order to address inconsistencies using paragraphs of different IFRSs, or to provide clarifications:

- IFRS 1 "Hedge accounting by a first-time adopter"
- IFRS 7 "Gain or loss on derecognition"
- IFRS 7 "Disclosure of deferred difference between fair value and transaction price"
- IFRS 7 "Introduction and credit risk disclosures"
- IFRS 9 "Lessee derecognition of lease liabilities"
- IFRS 9 "Transaction price"
- IFRS 10 "Determination of a de facto agent"
- IAS 7 "Cost method"

The above new standard, amendments to existing standards, and annual improvements are not expected to have any material impact on the Company's financial statements.

2.4 Exemption from Presenting Consolidated Financial Statements

In accordance with IFRS 10 Consolidated Financial Statements, a parent is required to present consolidated financial statements. However, the standard permits a parent that is itself a subsidiary not to present consolidated financial statements if it meets certain conditions [IFRS 10.4 (a)].

Ethniki Asfaltiki (the Company) is a subsidiary of Piraeus Bank (PB), a Company registered in Greece.

The Company meets all the conditions under IFRS 10.4 (a), and, therefore, it qualifies for the exemption available to ultimate parent entities. In particular:

- The Company is wholly owned by its parent, who has been informed and has not objected to the non preparation of consolidated financial statements.
- The Company's debt or equity instruments are not publicly traded, and it is not in the process of issuing any such instruments in a public market.
- The ultimate parent Company, PB, prepares and publishes consolidated financial statements that comply with IFRS, which are publicly available in accordance with the requirements of the EU Accounting Directive 2013/34/EU and N. 4308/2014. The aforementioned consolidated financial statements have been posted on the website of Piraeus Bank, at the following link:

https://www.piraeusgroup.gr/-/jssmedia/Com/2025/Files/Investors/Financials/Financial-Results/12M/Piraeus-Bank-SA_Annual-Financial-Report-2025-of-PB.pdf?sc_lang=el

Accordingly, these financial statements represent the stand-alone financial statements of the Company for the year ended 31 December 2025.

2.4.1 Investments in subsidiaries, associates and joint ventures

In the Company's Financial Statements, subsidiaries, associates and joint ventures are measured at cost less any impairment loss.



2.4.2 Impairment assessment of goodwill and investments in subsidiaries, associates and joint ventures

At each reporting date, the Company assesses whether there is any indication that an investment in a subsidiary, associate or joint venture may be impaired. If any such indication exists, the Company estimates the recoverable amount of the investment. Where the carrying amount of an investment is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount. Recoverable amount is defined as the higher of fair value less costs to sell and value in use.

An impairment loss recognized in prior years may be reversed only if there has been a change in the estimates used to determine the asset's recoverable amount. The increased carrying amount of the asset resulting from the reversal of the impairment loss should not exceed the carrying amount that would have been determined had no impairment loss been recognized.

2.5 Business combinations

2.5.1 Acquisition method

Acquisitions of businesses within the scope of IFRS 3 are accounted for using the acquisition method. The consideration transferred in a business combination is measured at fair value, which is calculated as the sum of the acquisition-date fair values of the assets transferred by the Company, liabilities assumed by the Company from the former owners of the acquiree and the equity interests issued by the Company in exchange for control of the acquiree. Acquisition-related costs are generally recognized in profit or loss as incurred.

At the acquisition date, the identifiable assets acquired, and the liabilities assumed are recognized at their fair value at such date, except that:

- deferred tax assets or liabilities and liabilities or assets related to employee benefit arrangements are recognized and measured in accordance with IAS 12 "Income Taxes" and IAS 19 "Employee Benefits" respectively,
- liabilities or equity instruments related to share-based payment arrangements of the acquiree or share-based payment arrangements of the Company entered into to replace share-based payment arrangements of the acquiree are measured in accordance with IFRS 2 "Share-based Payment" at the acquisition date ,
- assets (or disposal groups) that are classified as held for sale in accordance with IFRS 5 "Non-current Assets Held for Sale and Discontinued Operations" are measured in accordance with that standard.

2.5.2 Goodwill

Goodwill is measured as the excess of (a) the sum of the consideration transferred, the amount of any non-controlling interests in the acquiree, and the fair value of the acquirer's previously held equity interest in the acquiree (if any) over (b) the acquisition-date net amount of the identifiable assets acquired, and the liabilities assumed. If, after reassessment, the acquisition-date net amount of the identifiable assets acquired and liabilities assumed exceeds the sum of the consideration transferred, the amount of any non-controlling interests in the acquiree and the fair value of the acquirer's previously held interest in the acquiree (if any), the excess is recognized immediately in profit or loss.

2.5.3 Contingent consideration

When the consideration transferred by the Company in a business combination includes assets or liabilities resulting from a contingent consideration arrangement, the contingent consideration is measured at its acquisition-date fair value and included as part of the consideration transferred in a business combination. Changes in the fair value of the contingent consideration that qualify as measurement period adjustments are adjusted retrospectively, with corresponding adjustments against

goodwill. Measurement period adjustments are adjustments that arise from additional information obtained during the "measurement period" (which cannot exceed one year from the acquisition date) about facts and circumstances that existed at the acquisition date.

The subsequent accounting for changes in the fair value of the contingent consideration that do not qualify as measurement period adjustments depends on how the contingent consideration is classified. Contingent consideration that is classified as equity is not remeasured at subsequent reporting dates and its subsequent settlement is accounted for within equity. Other contingent consideration that is either a financial instrument within the scope of IFRS 9 or a non-financial asset or liability, is remeasured, at fair value at each subsequent reporting date and the changes in fair value are recognized in profit or loss.

2.5.4 Business combination achieved in stages

When a business combination is achieved in stages, the Company's previously held equity interest in the acquiree is remeasured to fair value at the acquisition date (i.e. the date when the Company obtains control) and the resulting gain or loss, if any, is recognized in profit or loss. Amounts arising from interests in the acquiree prior to the acquisition date that have previously been recognized in other comprehensive income are reclassified to the profit or loss where such treatment would be appropriate if that interest were disposed of.

2.5.5 Provisional Accounting

If the initial accounting for a business combination is incomplete by the end of the reporting period in which the combination occurs, the Company reports provisional amounts for the items for which the accounting is incomplete. Those provisional amounts are adjusted during the measurement period (see Note 2.5.3 above), or additional assets or liabilities are recognized, to reflect new information obtained about facts and circumstances that existed at the acquisition date that, if known, would have affected the amounts recognized at that date.

2.6 Foreign currency translations

Items included in the Financial Statements of the Company are measured using the currency that best reflects the economic substance of the underlying events and circumstances relevant to that entity ("the functional currency"). The Financial Statements of the Company are presented in thousands of Euro (€), which is the functional currency of the Company.

Foreign currency transactions are translated into the functional currency at the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation of monetary assets and liabilities denominated in foreign currencies are recognized in profit or loss, except when deferred to other comprehensive income as gains or losses from qualifying cash flow or net investment hedging instruments. Translation differences on debt securities and other monetary financial assets re-measured at fair value are included in line item "Other income/(expenses)" within statement of comprehensive income. Translation differences on non-monetary financial assets are a component of the change in their fair value and are recognized in the profit or loss for equity securities held for trading, or in other comprehensive income for equity securities measured at fair value through other comprehensive income. Non-monetary items that are measured in terms of historical cost in a foreign currency shall be translated using the exchange rate at the date of the transaction.

When preparing the Financial Statements, assets and liabilities of foreign entities are translated at the exchange rates prevailing at the reporting date, while income and expense items are translated at average rates for the period. Differences resulting from the use of closing and average exchange rates and from revaluing a foreign entity's opening net asset balance at closing rate are recognized directly in line item "Currency translation differences" within other comprehensive income (OCI). Cumulative translation adjustments are reclassified from OCI to net income upon disposal of foreign subsidiaries.



When a monetary item forms part of a reporting entity's net investment in a foreign operation and is denominated in a currency other than the functional currency of either the reporting entity or the foreign operation, the exchange differences that arise in the separate financial statements of both companies are reclassified to other comprehensive income upon consolidation. When a foreign entity is sold, such translation differences are recognized in profit or loss as part of the gain or loss on disposal.

Goodwill and fair value adjustments arising on the acquisition of a foreign entity are treated as assets and liabilities of the foreign entity and translated at the closing rate.

2.7 Financial instruments

2.7.1 Recognition and derecognition

Initial recognition of financial assets and liabilities is on the trade date, which is the date on which the Company becomes a party to the contractual provisions of the instrument. A financial asset or a financial liability is initially measured at fair value plus transactions costs that are directly attributable to the acquisition or issue, for a financial asset or financial liability measured at amortised cost or FVOCI. On the other hand, transaction costs directly attributable to the acquisition of a financial asset or financial liability measured at FVTPL are recognized immediately in profit or loss.

Financial assets are derecognized only when the contractual rights to the cash flows from the asset expire. The Company derecognizes a financial liability when its contractual obligations expire or are discharged or cancelled. The Company also derecognizes a financial asset or a financial liability when its terms are modified and the cash flows of the modified financial instrument are substantially different, in which case a new financial asset or liability is recognized at fair value plus eligible transaction costs based on the modified terms.

On derecognition of a financial asset or financial liability, the difference between the carrying amount at the date of derecognition and the consideration received (including any new asset obtained less any new liability received) is recognized in profit or loss.

2.7.2 Classification of financial assets

The classification of financial assets reflects the basis on which those assets are subsequently measured in the statement of financial position and how gains and losses generated by those assets are reported. The classification of financial assets is assessed at initial recognition and cannot be modified afterwards, unless if, in rare circumstances, the business model in which those financial assets are held changes.

The subsequent measurement of financial assets is driven by the contractual cash flow characteristics and the business model within which these assets are held. The contractual characteristics test aims at identifying those assets with cash flows consistent with a basic lending arrangement, i.e., which are solely payments of principal and interest (SPPI). The business model assessment refers to how the Company manages its financial assets with the objective of generating cash flows.

The combined effect of these two criteria determines whether financial assets are classified as measured at amortised cost, fair value through other comprehensive income (FVOCI) or fair value through profit or loss (FVTPL).

Business model assessment

The objective of the business model assessment is to classify financial assets based on how the Company manages them to generate cash flows - by collecting contractual cash flows (held-to-collect), selling financial assets or both (held-to-collect and sell). If neither of these is applicable - for instance, financial assets are held for trading purposes - the business model is 'other' and the financial asset is measured at

FVTPL. What is more, the business model does not constitute a choice (i.e. it's not a voluntary designation), but instead it is a matter of fact that can be observed by the way the Company is managed and information is provided to management.

The business model assessment is neither carried out on an instrument-by-instrument basis (i.e. it does not depend on management's intention for an individual instrument) nor at a reporting entity level. The Company's business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. Moreover, in some circumstances it may be appropriate to separate a portfolio of financial assets into sub-portfolios in order to reflect the way in which the Company manages those assets.

The Company primarily holds financial assets to fund insurance liabilities. In particular, for the life insurance business, the Company holds a portfolio of debt instruments to fund the life insurance contract obligations toward policyholders. The portfolio comprises mainly highly rated government debt securities as well as investment grade corporate bonds with the aim of matching the duration of financial assets with its insurance contract obligations. Consistent with its investment policy, the Company also monitors the yield on the debt securities portfolio to earn a targeted yield. The Company therefore assesses its life insurance portfolio to determine the optimal mix to achieve the targeted duration match and yield. Hence, the objective of the business model is to hold some financial assets within the portfolio for the collection of contractual cash flows and to sell others to achieve a targeted yield and a better duration match.

Furthermore, in order to manage the dynamic profile of its non-life business, the Company holds highly liquid assets that can be sold in a timely manner to respond to changes in the liquidity risk profiles of the Company. That is, financial assets are sold and purchased to rebalance the portfolio to match the risk profile or exposure desired by the Company. Besides, unexpected or rapid changes in market conditions may necessitate more frequent or significant rebalancing of debt securities. In this regard, the asset portfolio needs to (a) retain sufficient liquidity to meet policyholder obligations when they become due, and (b) generate sufficient investment income to contribute to the overall profitability of the Company. As a consequence, the financial assets backing non-life insurance contract liabilities are managed in the business model that is held to collect contractual cash flows and for sale.

What is more, certain debt securities are held in separate portfolios for longer-term yield. These include high quality, long-dated government and corporate bonds backing (a) life investment contracts with a guaranteed return to the policyholder, and (b) DAF guaranteed contracts with both a fixed maturity and technical rate to the policyholder. Accordingly, the Company follows a buy-and-hold strategy for the associated debt securities portfolio consistent with the notion of a hold-to-collect business model.

In addition, the Company manages and evaluates certain debt securities on a fair value basis following the implementation of the Company's strategic asset allocation. This sub-portfolio comprises highly rated corporate debt securities from both the life and non-life business with the objective of disposing of these securities in the near future, thus being held within an 'other' business model.

Contractual cash flow characteristics assessment (SPPI)

Financial assets which are held within the held-to-collect and held-to-collect and sell business model are assessed in order to determine whether their contractual cash flows are solely payments of principal and interest (the so-called SPPI test). If they meet the SPPI criterion, then they are eligible for being measured at either amortised cost or FVOCI depending on the business model within which they are held. Where the contractual terms introduce exposure to risk or variability of cash flows incompatible with the SPPI criterion, then they fail the test, and, as a result, they are mandatorily classified as measured at FVTPL.

The Company applies the SPPI assessment to its debt security and lending portfolios. In assessing whether the contractual cash flows of debt securities and loans are SPPI, the Company considers whether their contractual terms are consistent with a basic lending arrangement. In such a basic lending-type



relationship, the holder or lender of the financial asset is looking to earn a return that compensates them for the passage of time and for credit risk, since consideration for the time value of money (TVM) and credit risk are typically the primary components of interest.

Whilst the consideration for the TVM and credit risk are typically the most significant elements of interest, the description of interest can include also consideration for liquidity risk and the entity's funding costs, as well as compensation for servicing costs and a profit margin, because if this were not the case, almost all financial assets would fail the SPPI condition and be classified at FVTPL.

In contrast, elements that introduce exposure to risks unrelated to a simple lending relationship (for example, exposure to movements in equity prices) could create variability in cash flows which is incompatible with the SPPI criterion.

In carrying out the SPPI assessment, the Company evaluates whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows in a way that could not meet the SPPI condition. Such terms that the Company considers include, amongst other, prepayment and extension features, deferred interest-free payments, ESG features, bail-in clauses, equity conversion options, features that modify the consideration for the TVM (e.g. periodic reset of interest rates) and any other feature that may introduce leverage to the lending arrangement.

The Company applies the *de minimis* provision, according to which the degree of cash variability must have the ability to have more than a "de minimis" (that is negligible or insignificant) effect on the contractual cash flows. As a result, the Company does not need to take into consideration any contractual cash flow characteristics that do not represent SPPI if they could only have a de minimis effect on the contractual cash flows of the financial asset.

The SPPI assessment is performed by the Company on initial recognition and is not subsequently reconsidered. For example, if a debt instrument contains a non-SPPI feature at origination, but the feature subsequently expires, the instrument is not reassessed or reclassified unless its terms are modified. In case the debt instrument is subsequently renegotiated or otherwise modified and the renegotiation or modification to the contractual cash flows is substantial enough to have resulted in the derecognition of the original instrument, then the SPPI test must be re-performed based on the modified terms. In this case, the result of the initial assessment might as well change with the modified instrument being classified into a different category from the original one.

The Company performs a quantitative assessment on whether a feature has a de-minimis effect on the contractual cash flows of the financial asset in each reporting period and cumulatively over the life of the financial asset. In the event that the impact of a cash flow characteristic is assessed to be de minimis, then the contractual feature is disregarded when assessing SPPI.

The Company carries out the SPPI assessment on an individual basis for its debt securities portfolio and collectively for its lending portfolio.

The SPPI assessment overrides the business model assessment in that a debt instrument that is held to collect contractual cash flows, but does not pass the SPPI test, cannot be classified as measured at amortised cost. Instead, it is mandatorily classified as measured at FVTPL due to its non SPPI cash flows.

As a result of the above, the assessment in the end will screen out structured financial instruments where the relevant objective is not to provide consideration for just the passage of time and credit-related risks. In this case, amortised cost accounting is not appropriate for measuring contractual cash flows that are not solely payments of principal and interest, but instead those cash flows require a valuation overlay to contractual cash flows (i.e., fair value) to ensure that the reported financial information is relevant and useful.

2.7.3 Measurement of financial assets

Initial measurement

Financial assets are measured initially at fair value plus eligible transaction costs for assets held at amortised cost or FVOCI. In addition, on initial recognition the Company may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortised cost or FVOCI as measured at FVTPL if doing so eliminates or significantly reduces an accounting mismatch. The election is made on instrument-by-instrument basis. What is more, on initial recognition of an equity investment that is not held for trading, the Company may irrevocably elect to present subsequent changes in fair value in OCI. The election is made on an instrument-by-instrument basis.

Subsequent measurement

The measurement of a financial asset after initial recognition is based on the business model assessment and whether the contractual cash flows associated with the asset meet the SPPI criterion.

The Company measures debt instruments at **amortised cost** if (a) its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding (i.e. it passes the SPPI test), (b) it is held within a business model whose objective is to hold assets to collect contractual cash flows, and (c) it is not irrevocably designated on initial recognition as measured at FVTPL. Such instruments comprise debt securities backing life investment and DAF contracts with a guaranteed return, collateralized loans, short-term deposits, and other financial receivables. For debt securities, interest income using the effective interest method (including any amortisation of premiums earned or discounts incurred) and credit impairment losses are recognized in profit or loss. Any gain or loss on derecognition is also recognized in profit or loss. Interest income on loans and term deposits is recognized on an accrual basis, which, together with credit impairment losses, are recorded in the income statement. Foreign exchange gains and losses are recognized in profit or loss.

A debt instrument is measured at **FVOCI** if (a) it passes the SPPI test, (b) is held within a business model whose objective is achieved by both collecting contractual cash flows and selling assets, and (c) it is not irrevocably designated on initial recognition as measured at FVTPL. Such instruments include debt securities backing life insurance and non-life insurance contract liabilities, investments for unit linked contracts, and a small portion of equity instruments not held for trading for which the Company has made use of the option to present changes in fair value in OCI. Interest income calculated using the effective interest method (including any amortisation of premiums earned or discounts incurred), foreign exchange gains and losses and credit impairment losses are recognized in profit or loss. The cumulative unrealized gains or losses net of ECL losses are recorded in other comprehensive income. Upon derecognition, the gains and losses accumulated in OCI are reclassified to profit or loss as net capital gains or losses on debt securities.

For equity instruments that the Company has elected at initial recognition to classify at FVOCI, any subsequent changes in fair value are recognized in OCI and are not recycled to profit or loss. Instead, the related cumulative gains or losses are transferred to retained earnings upon derecognition. Dividend income from these investments is recognized in profit or loss, while changes in fair value attributable to fluctuations in the exchange rate between the foreign currency and the functional currency are, together with all other fair value changes, recognized entirely in other comprehensive income.

The Company measures financial assets at **FVTPL**, if they do not meet the SPPI criterion, or if they are held within a business model where they are managed and evaluated on a fair value basis. Such assets include debt securities either being managed on a fair value basis or being non-SPPI, equity securities, fund investments, investments in mutual funds that do not meet the SPPI criterion, investments held for unit-linked contracts, and derivative financial assets which by default have non SPPI cash flows. All changes in

fair value together with realized gains or losses are recognized as investment income in the income statement. Interest income and dividend income are recognized in profit or loss within other interest and similar income. Changes in fair value attributable to changes in the exchange rate between the foreign currency and the functional currency are recognized with other changes in fair value in profit or loss.

Further details on the classification and measurement of the Company's financial investments are presented in notes 18, 19, 20 and 21.

2.7.4 Impairment of Amortised Cost and FVOCI financial assets

The Company recognizes allowance for expected credit losses (ECL) that reflects changes in credit quality since initial recognition to financial assets that are measured at amortised cost or FVOCI. The impairment applies to debt securities, loans, term deposits and other receivables measured at amortised cost. No ECLs are recognized on equity investments.

ECL is an unbiased, probability-weighted estimate of credit losses that reflects the time value of money. It considers all reasonable and supportable information, including forward-looking economic assumptions and a range of possible outcomes. ECL represents the difference between the contractual cash flows of a financial asset and those that the Company expects to receive, discounted at the effective interest rate. The amount of ECL is updated at each reporting date to reflect changes in credit risk since the initial recognition of the financial asset.

Expected credit losses are calculated on either a 12-month or lifetime basis depending on the extent to which credit risk has increased significantly since initial recognition, except where the Company uses the simplified approach to apply lifetime ECLs to other receivables that do not contain a significant financing component.

The Company records a loss allowance equal to:

- 12-month ECL resulting from default events that are possible within the 12 months after the reporting date for financial assets for which the credit risk has not increased significantly since initial recognition; or
- lifetime ECL arising from all possible default events over the expected life of the financial assets that have experienced a significant increase in credit risk since initial recognition, as well as for financial assets for which a credit event has occurred since their initial recognition.

Significant increase in credit risk

An assessment of whether credit risk has increased significantly since initial recognition considers the change in the risk of default occurring over the remaining expected life of the financial instrument. In determining whether there has been a significant increase in credit risk (SICR), the Company uses quantitative criteria based on relative probability of default (PD) movements by utilizing Bloomberg's ratings together with qualitative indicators such as historical delinquency, legal bankruptcy, legal default, or distressed restructuring.

Movements between stages

The Company classifies debt instruments into stages with the following characteristics.

Stage 1. These debt instruments are unimpaired and without significant increase in credit risk on which a 12-month allowance for ECL is recognized.

Stage 2. A significant increase in credit risk has been experienced on these debt instruments since initial recognition for which a lifetime ECL is recognized.

Stage 3. There is objective evidence of impairment, and the debt instruments are therefore considered to be in default or otherwise credit impaired on which a lifetime ECL is recognized.

Debt instruments can be transferred between the different stages depending on their relative increase in credit risk since initial recognition.

At purchase or origination date, the Company classifies debt instruments at stage 1 and assesses changes in the instrument's risk of default on a quantitative basis by comparing the PD of the instrument determined at two different dates:

- at the reporting date, and
- at inception of the instrument.

If, based on the Company's quantitative comparison criteria, an increase exceeds the set threshold, a significant increase in credit risk is deemed to have occurred and the instrument is transferred to stage 2 with lifetime ECL recognized. The threshold applied is based on Bloomberg's rating system, which converts calculated probabilities of default into multiple different credit ratings. The SICR assessment based on PD changes is made for each new purchase. The quantitative comparison assesses default risk by looking at whether an instrument's lifetime PD has doubled and increased by at least 0.2%.

Irrespective of the SICR assessment based on default probabilities, all financial assets are deemed to have suffered a significant increase in credit risk when they are 30 days past due, in which case the asset is allocated into stage 2.

Debt instruments are transferred to Stage 3 when they have been assessed to be distressed. The quantitative analysis is based on Bloomberg's ratings assigned to instruments based on the Bloomberg's PD calculator. Distressed securities are defined as instruments issued by corporate issuers with a one-year PD of greater than 10% or sovereign issuers with a one-year PD of greater than 8.5%.

What is more, debt instruments are transferred to Stage 3 when they have defaulted or are otherwise considered to be credit-impaired. Default is considered to have occurred when contractual payments of either principal or interest are past due for more than 90 days.

Debt instruments are transferred out of stage 2 if their credit risk is no longer considered to be significantly increased since initial recognition based on the assessment described above.

Debt instruments are transferred out of stage 3 when they no longer exhibit any evidence of credit impairment as described above.

Defaulted and credit-impaired financial assets

The Company considers a financial asset as defaulted when one or a combination of events with detrimental impact on the future estimated cash flows has occurred. The Company considers the following as constituting an event of default for credit risk management purposes, as historical experience indicates that financial assets that meet either of the following criteria are generally not recoverable:

- When there is a breach of financial covenants by the issuer or borrower
- Information developed internally or obtained from external sources indicates that the debtor is unlikely to pay its creditors in full.

Regardless of the afore-mentioned factors, the Company considers that default occurs when a financial asset is past due more than 90 days.

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



- The issuer or borrower faces a significant difficulty in meeting their financial obligations
- There has been a breach of contract such as default or past due event
- It is becoming probable that the borrower will enter bankruptcy or other financial re-organization
- The issuer or borrower has become insolvent.

Measurement of expected credit losses

The measurement of ECL is an unbiased probability-weighted estimate of credit losses incorporating all available information that is relevant to the assessment including information about past events, current conditions and reasonable and supportable forecasts of future events and economic conditions at the reporting date. In addition, the estimation of ECL should take into account the time value of money.

The Company calculates ECL using three main components: a probability of default (PD), a loss given default (LGD) and the exposure at default (EAD). The 12-month ECL is calculated by multiplying the 12-month PD, LGD and EAD discounted by the appropriate rate. Lifetime ECL is calculated using the lifetime PD instead.

The 12-month and lifetime PDs represent the likelihood of an issuer or borrower defaulting on their financial obligation, assessed on the prevailing economic conditions at the reporting date, and adjusted to take into account estimates of future economic conditions that are likely to impact the risk of default either over the next 12 months for stage 1 financial assets, or over the remaining lifetime for stage 2 and 3 financial assets.

The EAD represents the expected balance at default, taking into account the repayment of principal and interest from the balance sheet date to default event.

The LGD represents expected losses on the EAD given the event of default, taking into account among other attributes, the mitigating effect of collateral value at the time expected to be realized and the time value of money. The LGD varies per counterparty, type and seniority of asset and is expressed as a percentage loss per unit of EAD.

For debt securities measured at amortised cost or FVOCI, the Company utilizes the IFRS 9 ECL Bloomberg tool in the estimation of the expected credit losses by obtaining high quality risk data for current and historical PDs, LGDs, EADs and other credit risk data per position or lot level.

Simplified approach for other receivables

The Company has adopted a simplified approach to other receivables measured at amortised cost. This allows measurement of lifetime ECLs only, thereby removing the need to identify SICR. For these balances, the Company makes use of provision matrices in order to calculate such lifetime ECLs. This is a practical expedient allowed by IFRS 9 whereby historical credit loss experience and fixed loss rates are applied to outstanding balances.

Write-off financial assets

Where the Company has no reasonable expectations of recovering a financial asset either in its entirety or a portion of it, the gross carrying amount of that asset is reduced directly, partially or in full against the ECL allowance. This is the case when the issuer or borrower has been placed into liquidation or has entered into bankruptcy proceedings (without, however, releasing the counterparty from its contractual obligation). Financial assets written off may still be subject to enforcement activities in accordance with the Company's recovery procedures. Any recoveries made are recognized in profit or loss.

Presentation of ECL allowance

At each reporting date, the Company recognizes an impairment allowance as follows:

- For financial assets measured at amortised cost, the ECL allowance reduces the gross carrying amount of the asset in the statement of financial position with a corresponding expense recognized in the income statement within the line net credit impairment losses;
- For debt securities measured at FVOCI, the ECL allowance does not reduce the carrying amount of the securities in the statement of financial position which remains at their fair value. Instead, an amount equal to the ECL allowance and its subsequent changes is reclassified from OCI to the income statement within the line net credit impairment losses.

Further details on ECL allowance of the Company's financial assets are presented in note 8.

2.7.5 Financial Liabilities

Classification of financial liabilities

The classification of financial liabilities reflects the basis on which those liabilities are subsequently measured in the statement of financial position. The Company classifies and subsequently measures financial liabilities at amortised cost or fair value though profit or loss.

Financial liabilities are further assessed on whether they contain any embedded derivatives. In particular, the Company carries out the following assessment in order to:

- identify any embedded derivatives;
- determine whether the host contract (the non-derivative component) is a debt or equity instrument;
- evaluate whether the economic characteristics and risks of any identified embedded derivative are closely related to those of the host contract; and
- decide whether the embedded derivative shall be separated from the host contract.

In case the contract contains an embedded derivative, which is assessed to be separated from the host contract, then it is measured at fair value though profit or loss.

The Company's financial liabilities include borrowings from financial institutions, investment contracts, and contingent liabilities that fall within the scope of IFRS 9.

Borrowings comprising subordinated debt issued by the Company with fixed or determinable payments are recognized initially at fair value, net of transaction costs that are directly attributable to the contract. Borrowings are subsequently measured at amortised cost. The difference between the net proceeds and the redemption value is recognized in the income statement over the borrowing period using the effective interest.

Investment contract liabilities comprise products with both single and regular premiums having a guaranteed return in the form of fixed interest at maturity, as well as certain DAF products with a guaranteed return. They have been assessed not to carry significant insurance risk and therefore are accounted for as investment products in accordance with IFRS 9. They are recognized initially at fair value or the amount deposited by the contract holder, net of transaction costs that are directly attributable to the contract. The vast majority of Investment contract liabilities are subsequently measured at amortised cost using the effective interest method, while a small portion is measured at FVTPL.



2.8 Fair value of financial instruments

The Company measures the fair value of its financial instruments based on a framework for measuring fair value that categorizes financial instruments based on a three-level hierarchy of the inputs to the valuation technique, as discussed below.

Level 1: Unadjusted quoted prices in active markets for identical assets or liabilities. Level 1 assets and liabilities include debt and equity securities and derivative contracts that are traded in an active market.

An active market is a market in which transactions for assets or liabilities take place with sufficient frequency and volume to provide pricing information on an ongoing basis and are characterized with low bid/ask spreads.

Level 2: Observable inputs other than Level 1 quoted prices, such as quoted prices for similar assets or liabilities, quoted prices in markets that are not active, or other inputs that are observable or can be corroborated by observable market data (for example derived from prices) for substantially the full term of the assets or liabilities.

Level 2 assets and liabilities include debt securities with quoted prices that are traded less frequently than exchange-traded instruments, as well as debt securities without quoted prices and certain derivative contracts whose values are determined using pricing models, discounted cash flow methodologies, or similar techniques with inputs that are observable in the market or can be derived principally from or corroborated by observable market data. This category generally includes government and corporate debt securities with prices in markets that are not active and certain over-the-counter ("OTC") derivative contracts.

Level 3: Unobservable inputs that are supported by little or no market activity and that are significant to the fair value of the assets or liabilities. If a fair value measurement uses observable inputs that require significant adjustment based on unobservable inputs, that measurement is a Level 3 measurement. Level 3 assets and liabilities include financial instruments whose value is determined using pricing models, discounted cash flow methodologies, or similar techniques, as well as instruments for which the determination of fair value requires significant management judgment or estimation.

The level in the fair value hierarchy within which the fair value measurement is categorized in its entirety, is determined on the basis of the lowest level input that is significant to the fair value measurement in its entirety. For this purpose, the significance of an input is assessed against the fair value measurement in its entirety.

2.9 Insurance contracts (IFRS 17)

The Insurance contracts, reinsurance contracts held and investment contracts with discretionary participation features are accounted for under the insurance accounting provisions of IFRS 17. Investment contracts without discretionary participation features are accounted for as financial instruments in accordance with IFRS 9.

IFRS 17 is a comprehensive standard for insurance contracts ('1 insurance contract 11): a contract in which one party (the issuer) accepts significant insurance risk from the other party (the policyholder) by agreeing to indemnify the policyholder in the event of a specified uncertain future event (the insured event) that adversely affects the policyholder).

IFRS 17 sets forth the principles for recognition, measurement, presentation and disclosure of insurance contracts issued, reinsurance contracts held and investment contracts with discretionary participation features. A reinsurance contract is an insurance contract issued by an entity (the reinsurer) for the purpose of indemnifying another entity for claims arising out of one or more insurance contracts issued by that other entity (underlying contracts).

Insurance contracts are classified as direct participating contracts or contracts without direct participation features. The classification of insurance contracts forms the basis for the measurement model applied.

Under each measurement model, insurance contract liabilities are measured as the sum of the liability for remaining coverage (LRC) and the liability for incurred claims (LIC). The LRC represents the obligation under the insurance contract for insured events that have not yet occurred i.e., the obligation that relates to the unexpired portion of the coverage period, including the contractual service margin (CSM). The LIC reflects the obligation to investigate and pay valid claims for insured events that have already occurred, including events that have already occurred but for which claims have not been reported.

IFRS 17 recognizes and measures groups of insurance contracts mainly at a risk-adjusted probability-weighted present value of future cash flows (the fulfilment cash flows) that incorporates all available information within the boundary of the contract in a way that is consistent with observable market information, plus an amount representing the unearned profit in the group of contracts (the Contractual Service Margin or CSM). This represents the General Measurement Model (GMM) which is the default IFRS 17 measurement model of insurance contract assets and liabilities.

The premium allocation approach is an optional simplified form of measuring an eligible group of insurance contracts issued or reinsurance contracts held. Eligibility is assessed for each group of insurance contracts and the election is made for each eligible group. The premium allocation approach is permitted if, and only if, at the inception of the group of contracts, one of the following conditions are met:

- The entity reasonably expects that such simplification would produce a measurement of the liability for remaining coverage for the group that would not differ materially from the measurement that would be produced applying the requirements for the general model (i.e., the fulfilment cash flows related to future service plus the contractual service margin).
- The coverage period of each contract in the group (including insurance contract services arising from all premiums within the contract boundary determined at that date) is one year or less.

The second condition means that all contracts with a one-year coverage period or less qualify for the premium allocation approach, regardless of whether the first condition is met.

The first criterion above is not met if, at the inception of the group of contracts, an entity expects significant variability in the fulfilment cash flows that would affect the measurement of the liability for the remaining coverage during the period before a claim is incurred. Variability in the fulfilment cash flows increases with, for example:

- The extent of future cash flows related to any derivatives embedded in the contracts
- The length of the coverage period of the group of contracts

The simplified measurement model applies to the measurement of the Liability for Remaining Coverage (LRC), which does not need to be measured with fulfilment cash flows and CSM but is essentially similar to the Company's previous accounting treatment of "unearned premium approach and unearned acquisition costs". The measurement of the liability for incurred claims under PAA (previously claims outstanding and incurred-but-not-reported (IBNR)) is determined on a discounted probability-weighted expected value basis and includes an explicit risk adjustment for non-financial risk. It is applied to all of the Company's non-life insurance and reinsurance contracts as well as Group and Individual Life annually renewable contracts.

The third measurement model is the Variable Fee Approach (VFA) which is applied to contracts with direct participation features with regard to the policyholder's participation in the financial results from a specified pool of underlying items. VFA is an alternative model to GMM, which provides for a different treatment of changes in cash flows linked to financial variables whose impact is recorded in CSM in contrast to the GMM.



Reinsurance contracts held are not eligible for VFA application.

The classification and measurement of insurance and reinsurance contracts is explained in Note 31.

2.9.1 Presentation and Disclosure

For presentation in the statement of financial position, the Company aggregates insurance and reinsurance contracts issued, and reinsurance contracts held and presents separately:

- Portfolios of insurance and reinsurance contracts issued that are assets
- Portfolios of insurance contracts and reinsurance contracts issued that are liabilities
- Portfolios of reinsurance contracts held that are assets
- Portfolios of reinsurance contracts held that are liabilities

The portfolios referred to above are those established at initial recognition in accordance with the IFRS 17 requirements.

IFRS 17 requires separate presentation of:

- Insurance revenue
- Insurance service expense
- Insurance finance income or expense, disaggregated between profit or loss and other comprehensive income, if applicable
- Income or expenses from reinsurance contracts held

The Company provides disaggregated qualitative and quantitative information in the notes to the financial statements about:

- The amounts recognized in its financial statements from insurance contracts issued and reinsurance contracts held
- Significant judgements and changes in those judgements made when applying the standard

2.9.2 Separating components from insurance and reinsurance contracts

The Company assesses its insurance and reinsurance contracts to determine whether they contain distinct components which must be accounted for under another IFRS rather than IFRS 17. After separating any distinct components, an entity must apply IFRS 17 to all remaining components of the (host) insurance contract.

More specifically, IFRS 17 requires the separation of embedded derivatives, investment components, and performance obligations to provide non-insurance goods and services at inception of a contract, if certain conditions are met. The separated components need to be accounted for separately in accordance with IFRS 9 (embedded derivatives, investment components) or IFRS 15 (non-insurance goods and services).

IFRS 17 defines as non-distinct investment components, the amounts that an insurance contract requires the entity to repay to a policyholder in all circumstances, regardless of whether an insured event occurs (i.e., investment components) that are not highly inter-related with the insurance components and for which contracts with equivalent terms are sold, or could be sold, separately in the same market or the same jurisdiction.

The Company identifies the investment component of a contract by determining the amount that it would be required to repay to the policyholder in all scenarios with commercial substance. These include circumstances in which an insured event occurs, or the contract matures, or is terminated without an insured event occurring. Rights to withdraw, which may include items that are investment components,

are amounts payable to policyholders that do not represent an additional benefit payable when an insured event occurs.

The Company's insurance and reinsurance contracts do not contain any distinct embedded derivatives or investment components which must be separated and accounted for under IFRS 9.

Non-distinct investment components and rights to withdraw are not separated from the host insurance contract but are excluded from insurance revenue and insurance service expenses in the income statement. For most common life insurance products, the Company has identified the cash surrender value as the non-distinct investment component.

After separating any financial instrument components (distinct embedded derivatives and investment components), the Company separates any promises to transfer to policyholders' distinct goods or services other than insurance coverage and investment services and accounts for them as separate contracts with customers by applying IFRS 15.

Currently, the Company's products do not include any good or service components that require separation.

2.9.3 Level of Aggregation

IFRS 17 requires an entity to determine the level of aggregation for applying its requirements. The level of aggregation for the Company is determined firstly by dividing the business written into portfolios, including contracts with similar risks and which are managed together. Portfolios comprise of groups of contracts based on their profitability and annual cohorts. The groups are established at initial recognition and their composition is not reassessed subsequently.

The contract in each portfolio are divided on initial recognition into the following groups:

- Groups of contracts that are onerous at initial recognition;
- Groups of contracts that at initial recognition have no significant possibility of becoming onerous subsequently; and
- Groups of the remaining contracts in the portfolio.

The above groups of insurance contracts cannot include contracts issued more than one year apart in the same group (hereinafter referred to as "Annual Cohorts"). The Company has selected to apply annual cohorts in the determination of groups of insurance contracts. Therefore, the Company has decided to align the cohort to the financial reporting period i.e. 1st January to 31st December for both Life and Non-Life. The Company has not identified the existence of any "mutualised business" for contracts with direct participation features and therefore, does not elect the option (i.e. carve-out option) to not apply the requirement for annual cohorts, for groups of insurance contracts measured under VFA.

The Company divides portfolios of reinsurance contracts held by applying the same principles set out above, except that the references to onerous contracts refer to reinsurance contracts held for which there is a net gain at initial recognition. For some groups of reinsurance contracts held, a group can comprise a single contract.

For the determination of the unit of account, the Company identified the following steps:

- Separation of insurance components (interdependency, lapse experience, sales process, market considerations)
- Portfolios identification (similar risks - managed together)
- Cohorts
- Profitability assessment



The Company considers the legal form of the host/rider combinations in its entirety as the lowest unit of account for all its insurance contracts. If relevant, the Company may override the legal contract unit of account presumption, by separating components of a single contract subject to significant judgement and careful consideration of all facts and circumstances.

For reinsurance contracts held, the Company determined that no separation/unbundling can be performed in its reinsurance portfolio. Consequently, the lowest unit of account for reinsurance treaties is the Company's reinsurance treaty itself. The same treatment applies to facultative reinsurance agreements.

Portfolios Identification

The Company's interpretation of the "similar risk" criterion for non-Life business, was based on the allocation of the existing accounting Lines of Business into four major segments (Motor, Fire, GTPL, Other non-Life). For the 'common management' criterion, the Company considers the distribution channels through which insurance products are sold and also monitors their performance and profitability.

For the determination of IFRS 17 Portfolios in Life business, the Company considered the following additional dimensions in order to assess the "similar risks" requirement:

- Product Segmentation (e.g. Life Risk, Life Savings etc); and
- Frequency of the premium payment

2.9.4 Recognition, De-Recognition and Modifications

Insurance Contracts

The Company recognises groups of insurance contracts that it issues from the earliest of the following:

- The beginning of the coverage period of the group of contracts
- The date when the first payment from a policyholder in the group is due, or when the first payment is received if there is no due date
- For a group of onerous contracts, as soon as facts and circumstances indicate that the group is onerous

An insurance contract acquired in a transfer of contracts, or a business combination, is recognized on the date of acquisition.

When the contract is recognized, it is added to an existing group of contracts or, if the contract does not qualify for inclusion in an existing group, it forms a new group to which future contracts are added.

The Company derecognizes an insurance contract when, and only when:

- It is extinguished, i.e. when the obligation specified in the insurance contract expires or is discharged or cancelled;
- any of the conditions listed below are met, as a result of modifications to the insurance contract:

(a) if the modified terms had been included at contract inception, they would have given rise to the following accounting cases:

- the modified contract would have been excluded from the scope of IFRS 17;
- the Company would have separated the different components from the host insurance contract, resulting in a different insurance contract to which IFRS 17 would have applied;
- the modified contract would have had a substantially different contract boundary;

- the original contract met the definition of an insurance contract with direct participation features, but the modified contract no longer meets that definition, or vice versa;

(b) the original contract met the definition of an insurance contract with direct participation features, but the modified contract no longer meets that definition, or vice versa;

(c) the Company applied the Premium Allocation Approach to the original contract, but the modifications mean that the contract no longer meets the eligibility criteria for that approach.

In the event that a contract modification meets none of its above conditions, the Company treats changes in cash flows caused by the modification as changes in estimates of fulfilment cash flow.

Reinsurance contracts

The Company recognises a group of reinsurance contracts it has entered into, from the earlier of the following:

- The beginning of the coverage period of the group of reinsurance contracts held. The Company, however, delays the recognition of a group of reinsurance contracts held that provide proportionate coverage until the date any underlying insurance contract is initially recognized, if that date is later than the beginning of the coverage period of the group of reinsurance contracts held; and
- The date the Company recognises an onerous group of underlying insurance contracts if the Company entered into the related reinsurance contract held at or before that date.

The Company adds new contracts to the group in the reporting period in which that contract meets one of the criteria set out above.

For any reinsurance contracts acquired by the Company, initial recognition date coincides with the date of acquisition.

2.9.5 Measurement Models

According to the specific features of each insurance contract one of the following measurement approaches are prescribed by IFRS 17:

- General Measurement Model (GMM): it should be applied to all insurance contracts, unless they have direct participation features, and the contract is in the scope of the Variable Fee Approach, or the contract is eligible for the Premium Allocation Approach
- Premium Allocation Approach (PAA): it is an optional simplification for the measurement of the liability for remaining coverage for insurance contracts with short-term coverage
- Variable Fee Approach (VFA): it should be applied to insurance contracts with direct participation features i.e., contracts under which the entity provides investment-related services and is compensated for the services by a fee that is determined by reference to the underlying items.

The same measurement models, except for VFA, are also applicable to reinsurance contracts held as to insurance contracts issued.

The three measurement models apply to Company’s business as follows:

Model	Model Applicable Business	IFRS 17 segment
GMM	Whole and term life insurance contracts ¹ Deferred Annuities ¹ Endowment contracts in scope of IFRS 17 ¹ Guaranteed Unit – Linked contracts ¹	Life Risk & Savings
	Longer duration non-life insurance contracts that do not meet PAA eligibility criteria Reinsurance contracts held which do not meet PAA eligibility assessment	Motor & Other non Life ³
VFA	Non-guaranteed Unit Linked contracts	Direct Participating contracts
PAA	Short duration individual health and accident contracts ² Short duration group life and health contracts ²	Life & Health
	Short duration non-life insurance contracts Longer duration non-life insurance contracts that meet PAA eligibility criteria Reinsurance contracts held which meet PAA eligibility assessment	Motor & Other non Life ³

¹ including Health Riders, where applicable

² Annually renewable

³ includes all non life segments, other than motor

When GMM is applied for reinsurance contracts held, the Company applies the same accounting policies to the measurement of a group of reinsurance contracts held as to insurance contracts issued without direct participation features, taking into consideration that:

- the estimates of the present value of future cash flows are measured using assumptions that are consistent with those used to measure the estimates of the present value of future cash flows for the underlying insurance contracts, with an adjustment for any risk of non-performance by the reinsurer, and
- the effect of the non-performance risk of the reinsurer is assessed at each reporting date and the effect of changes in the non-performance risk is recognized in the income statement.

When PAA and VFA are not applied, the entity is required to apply the General Measurement Model. The classification of insurance contracts forms the basis for the measurement model applied. Insurance contracts that are classified as direct participating contracts are measured under VFA, whereas contracts without direct participation features are measured under GMM or PAA.

General Measurement Model (GMM)

The GMM represents the standard measurement model and applies to all contracts without direct participation features, to the extent that the alternative simplified measurement of PAA cannot be applied.

In Life business, pure risk and traditional saving policies (i.e. long-term Life & Health Business) are measured under GMM.

For Non-Life Business GMM is not applied since for all portfolios the coverage period is one year or less and thus, PAA is elected to measure such portfolios.

Variable Fee Approach (VFA)

The VFA is the mandatory measurement model to be applied for contracts with direct participation features. Direct participating contracts are contracts for which, at inception:

- The contractual terms specify that the policyholder participates in a share of a clearly identified pool of underlying items;
- The Company expects to pay the policyholder an amount equal to a substantial share of the fair value returns on the underlying items; and
- The Company expects a substantial proportion of any change in the amounts to be paid to the policyholder to vary with the change in fair value of the underlying items.

The term "substantial" between (b) and (c) should be considered in the same context of the objective of insurance contracts with direct participation features. The numerical percentages of threshold of meeting the definition of "substantial" in both criteria need not to be in a consistent manner as they are driven by different components. The Company considers as substantial sharing percentages of more than 50%.

Direct participating contracts include significant investment-related services. Assessment for the existence of insurance contracts with direct participation features is based on qualitative and quantitative criteria in order to appropriately reflect the individual contract specifics. The assessment of whether an insurance contract meets the VFA eligibility criteria is made at the contract's inception and not revised later, except in case of a substantial modification of the contract.

The Company applies the VFA to insurance portfolio of Unit-Linked contracts with no guarantees.

Premium Allocation Approach (PAA)

The Company applies the PAA for measuring insurance contracts with a coverage period of one year or less and for groups of contracts with more than one year coverage period, where it is reasonably expected that the measurement of the Liability for Remaining Coverage (LRC) does not differ materially from the one that would be produced by applying the GMM. Under the Premium Allocation Approach, the Liability for Remaining Coverage is equal to the premiums received at initial recognition less any insurance acquisition cash flows and any amounts recognized as insurance revenue at the closing date. The GMM remains applicable for the measurement of the Liability for Incurred Claims.

For all the contracts applying PAA, the measurement of the LIC aligns to the GMM, with an explicit risk adjustment for non-financial risk, and discounting applied to expected cash-flows.

The vast majority of the Company's direct non-life and yearly renewable life & health business has a duration of one year or less and is automatically eligible for the PAA model. For the remainder business the value of the LRC is measured under GMM and PAA. Where the LRC does not materially differ between the two measurement models (over the duration of the contract and in a range of reasonably foreseeable scenarios) the contract group is PAA eligible. The Company has multiple non-life reinsurance contracts which are greater than one year in or are risk-attaching. These have been assessed for PAA eligibility using the same approach for direct business and are all PAA eligible.



The Company measures its reinsurance assets for a group of reinsurance contracts that it holds on the same basis as insurance contracts that it issues. However, they are adapted to reflect the features of reinsurance contracts held that differ from insurance contracts issued, for example the generation of expenses or reduction in expenses rather than revenue. More specifically, for reinsurance contracts held, on initial recognition, the Company measures the remaining coverage at the amount of ceding premiums paid, plus broker fees paid to a party other than the reinsurer and any amounts arising from the derecognition of any other relevant pre-recognition cash flows

Where the Company recognises a loss on initial recognition of an onerous group of underlying insurance contracts or when further onerous underlying insurance contracts are added to a group, the Company establishes a loss-recovery component of the asset for remaining coverage for a group of reinsurance contracts held depicting the recovery of losses.

2.9.6 Contracts not measured under the PAA

The carrying amount of a group of insurance contracts at each reporting date is the sum of the liability for remaining coverage and the liability for incurred claims. The Liability for Remaining Coverage (LRC) comprises (a) the fulfilment cash flows that relate to services that will be provided under the contracts in future periods and (b) the Contractual Service Margin (CSM) at that date. The liability for incurred claims includes the fulfilment cash flows for incurred claims and expenses that have not yet been paid, including claims that have been incurred but not yet reported.

The fulfilment cash flows of groups of insurance contracts are measured at the reporting date using current estimates of future cash flows, current discount rates and current estimates of the risk adjustment for non-financial risk. Changes in fulfilment cash flows are recognized as follows:

- Changes relating to future services: Adjusted against the CSM as long as they do not create or affect the loss component (when the group of contract becomes or is onerous). Changes related to future services include:
 - i. adjustments to experience arising from premiums received in the period related to future service, and related future cash flows such as insurance acquisition cash flows and premium-based taxes.
 - ii. changes in estimates of the present value of future cash flows relative to the Liability for remaining coverage using discount rates determined at the date of initial recognition the group of contracts, when measured under GMM. Also, unlike the VFA, when GMM is applied, any changes in the impact of the time value of money and changes in the lifetime value of money, and the impact of financial risk and changes in financial risk, are not part of the changes in fulfilment cash flows affecting the CSM.
- Increases in fulfilment cash flow that exceed the carrying amount of the contractual service margin, or decreases in fulfilment cash flows are allocated to the loss component of the liability for remaining coverage (i.e. they result in a loss if the group of contracts is onerous or not from the reduction of the loss component), are recognized in the insurance services result (insurance service expenses).
- Changes relating to current or past services: Recognized in the insurance service result in profit or loss
- Changes in the effects of the time value of money, financial risk and changes therein on estimated future cash flows: Recognized as insurance finance income or expenses under GMM, whereas under VFA they adjust the CSM for changes that do not arise from the underlying items as well as for the amount of the group's share of fair value of the underlying items.

Fulfilment cash flows comprise unbiased and probability-weighted estimates of future cash flows, discounted to present value to reflect the time value of money and financial risks, plus a risk adjustment for non-financial risk.

The risk adjustment for non-financial risk for a group of insurance contracts (RA), determined separately from the other estimates, is the compensation required for bearing uncertainty about the amount and timing of the cash flows that arises from non-financial risk.

Expected Future Cash Flows

Expected future cash flows are the first component of fulfilment cash flows and represents the future cash flows within the contract boundary.

The Company's objective in estimating future cash flows is to determine the expected value, or the probability-weighted mean, of the full range of possible outcomes, considering all reasonable and supportable information available at the reporting date without undue cost or effort. The Company estimates future cash flows considering a range of scenarios which have commercial substance and give a good representation of possible outcomes. The cash flows from each scenario are probability-weighted and discounted using current assumptions.

Cash flows within the boundary of a contract relate directly to the fulfilment of the contract, including those for which the Company has discretion over the amount or timing.

These include premiums from policyholders, payments to (or on behalf of) policyholders, insurance acquisition cash flows, and other costs incurred in fulfilling the contracts.

Insurance acquisition cash flows arise from the activities of selling, underwriting and starting a group of contracts that are directly attributable to the portfolio of contracts to which the group belongs.

Depending on the type of services provided, other costs that are incurred in fulfilling the contracts include:

- claims handling, maintenance and administration costs;
- recurring commissions payable on instalment premiums receivable within the contract boundary;
- costs that the Company will incur in providing investment services;
- costs that the Company will incur in performing investment activities to the extent that that the Company performs them to enhance benefits from insurance coverage for policyholders by generating an investment return from which policyholders will benefit if an insured event occurs; and
- income tax and other costs are specifically chargeable to the policyholders under the terms of the contracts.

Discounting

IFRS 17 requires adjusting the estimates of expected cash flows to reflect the time value of money and the financial risks associated with those cash flows to the extent that the financial risks are not already included in the cash flow estimates.

An entity should use observable market data based on a risk-free base curve and portfolio-specific adjustments to reflect the illiquidity of insurance obligations in determining the interest rate curves.

For groups of contracts under GMM and PAA, the Company has determined discount rates using the bottom-up approach. Insurance contract liabilities are calculated by discounting expected future cash flows at a risk-free rate, as published by EIOPA, plus an illiquidity premium (ILP). A constant illiquidity premium across the risk-yield curve is used which is derived from a combination of Company's own investment portfolio and reference portfolios. Additionally, the ILP adjustment factor, based on own portfolio is applied to the calculation of illiquidity premium to address the duration mismatches.

For groups of contracts under VFA, Ethniki uses the risk-free discounting curve as it is provided by EIOPA, in alignment with IFRS 17 proposed approach methodologies.



Risk Adjustment (RA)

Risk adjustment is the second component of fulfilment cash flows and reflects the compensation an entity would require for bearing the uncertainty on the amount and timing of cash flows from non-financial risks, i.e., the uncertainty of cash flows that arise from insurance contracts, other than the uncertainty arising from financial risks. Such non-financial risks include insurance risks, lapse and expense risk. IFRS 17 does not prescribe a specific approach for determining the risk adjustment.

The method of Value at Risk calibrated using the Sli Standard Formula is the one chosen by the Company for the calculation of the IFRS 17 risk adjustment for non-financial risk, since it represents the most appropriate methodology to combine both compliance to the Standard and a lower complexity in terms of application.

The Company concluded that the RA corresponds to a confidence level of 80% and that this is reflective of its risk appetite and relevant PVFCF probability distribution.

The Company has not elected to disaggregate the change in the risk adjustment for non-financial risk between the insurance service result and insurance finance income or expenses.

Contractual Service Margin (CSM)

The Contractual Service Margin (CSM) is a component of the asset or liability for the group of insurance contracts that represents the unearned profit the Company will recognise as it provides services in the future, under the insurance contracts in the group.

The Company measures the CSM on initial recognition at an amount that, unless the group of contracts is onerous, results in no income or expenses arising from:

- the initial recognition of the fulfilment cash flows;
- any cash flows arising from the contracts in the group at that date;
- the derecognition at the date of initial recognition of:
 - any asset recognized for insurance acquisition cash flows; and
 - any other asset or liability previously recognized for cash flows related to the group of contracts.

For groups of reinsurance contracts held, any net gain or loss at initial recognition is recognized as the CSM unless the net cost of purchasing reinsurance relates to past events, in which case the Company recognises the net cost immediately in profit or loss.

For reinsurance contracts held, the CSM represents a deferred gain or loss that the Company will recognise as a reinsurance expense as it receives insurance contract services from the reinsurer in the future and is calculated as the sum of:

- a. the initial recognition of the FCF; and
- b. cash flows arising from the contracts in the group at that date;
- c. the amount derecognized at the date of initial recognition of any asset or liability previously recognized for cash flows related to the group of reinsurance contracts held (other pre-recognition cash flows); and
- d. any income recognized in profit or loss when the entity recognises a loss on initial recognition of an onerous group of underlying insurance contracts or on addition of onerous underlying insurance contracts to that group.

For groups of contracts acquired in a transfer of contracts or a business combination, the consideration received for the contracts is included in the fulfilment cash flows as a proxy for the premiums received at the date of acquisition. In a business combination, the consideration received is the fair value of the contracts at that date.

For groups of contracts assessed as onerous, the Company recognises a loss in the income statement for the net outflow, resulting in the carrying amount of the liability for the group being equal to the fulfilment cash flows and the CSM of the group being zero. A loss component is established for the liability for remaining coverage for an onerous group depicting the losses recognized which determines the amounts that are subsequently presented in the income statement as reversals of losses on onerous contracts and are excluded from insurance revenue.

Subsequently, the contractual service margin is adjusted depending on whether the GMM or the VFA is applied.

As described previously, under both measurement models, CSM gets adjusted for changes in cash flows related to future services. Under GMM, CSM is also adjusted for the interest accretion at interest rates locked-in at initial recognition of the group of contracts. For insurance contracts with direct participation features (measured under VFA), no explicit interest accretion is required since the CSM is effectively remeasured when it is adjusted for changes in financial risks, including the changes in the amount of the entity's share of the fair value of the underlying items.

Following all adjustments in CSM, a release from the CSM is recognized in profit or loss each period to reflect the services provided in that period based on 11 coverage units". The number of coverage units in a group is the quantity of coverage provided by the contracts in the group, which is determined by considering the quantity of the benefits provided and the expected coverage duration. The total coverage units of each group of insurance contracts are reassessed at the end of each reporting period to adjust for the reduction of remaining coverage for claims paid, expectations of lapses and cancellation of contracts in the period. The Company has defined either straight-line allocation over the passage of time (but reflecting the number of contracts in a group), or the maximum contractual cover in each period or the amounts the entity expected the policyholder to be entitled to receive as the default approach to determine these coverage units. If multiple services are provided in one contract, weighting either based on amounts of premiums in each period or based on expected outflows is applied, which is determined by the respective features of the contract. The Company has selected not to apply discounting in the determination of coverage units.

Under VFA, if certain criteria are met, an entity may apply the so-called risk mitigation option when it uses a derivative, a non-derivative financial instrument measured at fair value through profit or loss, or a reinsurance contract held to mitigate financial risk. The entity may then choose to exclude from the CSM some or all of the changes in the effect of the time value of money and financial risk on the amount of the entity's share of the underlying items. The Company does not apply risk mitigation for business measured under the VFA.

In case of groups of reinsurance contracts held and measured under GMM, the contractual service margin at the end of the reporting period shall be measured at the carrying amount determined at the beginning of the reporting period, adjusted for:

- the effect of any new contracts added to the group.
- interest accreted on the carrying amount of the contractual service margin, measured at discount rates determined at the date of initial recognition of a group of contracts.
- revenue recognized in profit or loss in the reporting period when an entity recognises a loss at initial recognition of an onerous group of underlying policies or when adding onerous underlying group of contracts that adjusts the contractual service margin of the group of reinsurance contracts held.
- reversals of a loss recovery component recognized at initial recognition, to the extent that such reversals do not constitute changes in the fulfilment cash flows of the group of reinsurance contracts held



- changes in fulfilment cash flows, measured at discount rates determined at the date of initial recognition of a group of contracts, to the extent that such change relates to a future service, unless:
 - i. the change is due to a change in the fulfilment cash flows allocated to a group of underlying contracts that does not result in an adjustment of the contractual service margin relative to the group of underlying contracts, or
 - ii. the change is due to a change in fulfilment cash flows allocated to a group of underlying insurance contracts (relating to onerous contracts), which group is measured under Premium Allocation Approach.
- the effect of any exchange currency differences arising on the contractual service margin, and
- the amount recognized in profit or loss for services received during the relevant period, determined by allocating the contractual service margin remaining at the end of the reporting period (before any allocation) to the current and remaining coverage periods of the group of reinsurance contracts held, based on certain 'coverage units'.

Recognition of Loss Component

For groups of contracts that are onerous at initial recognition or subsequently, the Company performs additional analysis to determine if a net outflow is expected from the contract. Such onerous contracts are separately grouped from other contracts and the liability for remaining coverage is determined by the fulfilment cash flows.

After an entity recognises a loss in an onerous group of insurance contracts, a loss component allocates (loss component systematic allocation):

- A.** in a systematic manner subsequent changes in fulfilment cash flows (for the liability of remaining coverage), between
 - i. the loss components of the liability of remaining coverage, and
 - ii. the obligation for the liability of remaining coverage, excluding the loss component.
- B.** exclusively to the loss component, until that component is zeroed:
 - i. any subsequent reduction, related to future service, in the fulfilment cash flows allocated to the group resulting from changes in estimates of future cash flows and from the adjustment of non-financial risk; and
 - ii. any subsequent increases in the amount of the entity's fair value share of the underlying assets

When reductions in the cash flow of onerous groups of contracts related to future services exceed the loss component, the Company adjusts the contractual service margin only for the part of the reduction that exceeds the amount allocated to the loss component.

The subsequent changes in the fulfilment cash flows to meet the liability for remaining coverage to be allocated as mentioned above are as follows:

- a. estimates of the present value of future cash flows for claims and expenses that are exempt from liability for remaining coverage due to insurance services costs incurred;
- b. changes in the adjustment of non-financial risk recognized in profit or loss due to the risk waiver; and
- c. financial or insurance expenses

The systematic allocation applied results in the total amounts allocated to the loss component, as mentioned above, being equal to zero at the end of the coverage period of a group of contracts.

2.9.7 Contracts measured under the PAA

The Company measures the carrying amount of the liability for remaining coverage as the premiums received, minus any insurance acquisition cash flows paid, and any amounts recognized as insurance revenue on a pro-rata basis.

The Company has chosen to defer the incurred insurance acquisition cash flows and not to expense them. Insurance acquisition cash flows are allocated on a straight-line basis as a portion of premium in the income statement (through insurance revenue and insurance service expenses).

Correspondingly, for reinsurance contracts held, the Company measures the carrying amount of Asset for Remaining Coverage as the reinsurance premiums paid, less any ceding commissions that were cleared.

Ceding commissions relating to reinsurance premiums held are recorded in the profit and loss statement as a reduction in reinsurance costs linearly and in relation to the recognition of reinsurance charges.

The Company has not elected to adjust the liability for remaining coverage for the time value of money (interest accretion), as premiums are received within one year of the coverage period or no significant financing component exists.

Recognition of Loss Component

If facts and circumstances (e.g., an expected combined ratio in excess of 100%) indicate that a group of insurance contracts measured under the PAA is onerous at initial recognition or subsequently becomes onerous, the Company performs further analysis to determine whether a net outflow is expected from the contract. In such cases, it increases the carrying amount of the LRC to reflect the fulfilment cash flows determined under the GMM, with the amount of the increase recognized in insurance service expenses, and a loss component is established for the amount of the loss recognized. Thereafter, the loss component is remeasured at each reporting date as the difference between the fulfilment cash flows determined under the GMM relating to future service and the carrying amount of the LRC excluding the loss component.

Liability for Incurred Claims

The Company estimates the liability for incurred claims as the fulfilment cash flows related to incurred claims. The fulfilment cash flows incorporate, in an unbiased way, all reasonable and supportable information available without undue cost or effort about the amount, timing and uncertainty of those future cash flows, they reflect current estimates from the perspective of the entity and include an explicit adjustment for non-financial risk (the risk adjustment as mentioned in Note 2.9.6). The Company adjusts the future cash flows for the time value of money and the effect of financial risk for the measurement of liability for incurred claims.

2.9.8 Insurance acquisition cash flow (IACF) asset

Insurance acquisition cash flows arise from the costs of selling, underwriting and starting a group of insurance contracts (issued or expected to be issued) that are directly attributable to the portfolio of insurance contracts to which the group belongs.

Insurance acquisition cash flows are not expensed as incurred but deferred over the coverage period for all measurement models for contracts already recognized and those not yet recognized. Any acquisition cash flows paid in advance (i.e. before the coverage starts) or unconditionally paid and related to renewals, are considered out of contract boundaries and are recognized as an asset.

The IACF asset is allocated on a systematic basis on the group of insurance contracts to which they belong to. Therefore, the allocated amount of IACF asset is recognized as part of the fulfilment cash flows and reduces the CSM of the related group of contracts under GMM and VFA or is recognized as part of the liability for remaining coverage for contracts measured under PAA.



Upon relevant allocation of insurance acquisition cash flows, the asset for insurance acquisition cash flow is derecognized from the statement of financial position. Ethniki performs an assessment regarding the recoverability of the asset for IACF, if facts and circumstances indicate potential impairment.

The recoverability assessment is performed in two steps, as follows:

- an impairment loss is recognized to the extent that the carrying amount of each asset for insurance acquisition cash flows exceeds the expected net cash inflow as determined by the fulfilment cash flows as at initial recognition for the related group of insurance contracts;
- in addition, when insurance acquisition cash flows directly attributable to a group of contracts are allocated to groups that include expected contract renewals, such insurance acquisition cash flows should not exceed the expected net cash inflow from the expected renewals as determined by the fulfilment cash flows as at initial recognition for the expected renewals; an impairment loss is recognized for the excess to the extent not recognized in the above step.

2.9.9 Reinsurance Contracts held

The Company measures portfolios of reinsurance contracts held applying the same principles set out above, for insurance contracts issued, except that the references to onerous contracts refer to reinsurance contracts held on which there is a net gain on initial recognition, and that VFA is not applicable for reinsurance contract held. The Company's portfolios of reinsurance contracts held are measured under PAA.

Recognition of Loss Recovery Component

For groups of reinsurance contracts held, that cover onerous underlying insurance contracts, a loss-recovery component needs to be established, within the asset for remaining coverage for reinsurance contracts held, for the amount of income recognized in profit or loss when the Company recognises a loss on initial recognition of an onerous group of underlying insurance contracts or on addition of onerous underlying insurance contracts to that group. Any loss-recovery component is determined with reference to the loss component recognized on underlying contracts and the recovery expected on such claims from reinsurance contracts held. The Company uses a systematic and rational method to determine the portion of losses recognized on the group of insurance contracts covered by the group of reinsurance contracts held where some contracts in the underlying group are not covered by the group of reinsurance contracts held.

Subsequently, the loss-recovery component is adjusted to reflect changes in the loss component of an onerous group of underlying insurance contracts. The loss-recovery component is further adjusted, if required, to ensure that it does not exceed the portion of the carrying amount of the loss component of the onerous group of underlying insurance contracts that the Company expects to recover from the group of reinsurance contracts held.

The loss-recovery component determines the amounts that are presented as a reduction of incurred claims recovery from reinsurance contracts held and are consequently excluded from the reinsurance income determination.

2.9.10 Contract Boundary

The Company includes in the measurement of a group of contracts all the future cash flows within the boundary of each contract in the group.

Insurance Contracts

Cash flows are within the boundary of an insurance contract if they arise from substantive rights and obligations that exist during the reporting period in which the Company can compel the policyholder to pay the premiums, or in which the Company has a substantive obligation to provide the policyholder with services. Contract boundary is considered as linked to the entity's ability to fully reprice a contract.

More specifically, a substantive obligation to provide services ends when the Company has the practical ability to reassess the risks and set a price or level of benefits that fully reflects those reassessed risks for either the particular policyholder or the portfolio that contains the contract. With regards to the latter, the pricing of the premiums up to the date when the risks are reassessed does not take into account the risks that relate to periods after the reassessment date.

Riders, representing add-on provisions to a basic insurance policy that provide additional benefits to the policyholder at additional cost, issued together with the main insurance contracts form part of a single insurance contract with all of the cash flows within its boundary.

Accordingly, the contract boundaries will be set considering the insurance contract as a whole and not considering each single cover in the contract separately, leading to differences compared to the current approach under Solvency II, especially for multi-risk contracts, where different covers may have different contract boundaries.

Cash flows are within the contract boundary of a reinsurance contract held if they arise from substantive rights and obligations that exist during the reporting period in which the Company is compelled to pay amounts to the reinsurer or has a substantive right to receive services from the reinsurer.

The contract boundary is reassessed at each reporting date to include the effect of changes in circumstances on the Company's substantive rights and obligations and, therefore, may change over time. Cash flows outside the contract boundary relate to future insurance contracts and are recognized when those contracts meet the recognition criteria.

2.9.11 Insurance Revenue from insurance contracts issued or from reinsurance contracts held

Contracts Measured under the PAA

The insurance revenue for the period is the amount of expected premium receipts (excluding any investment component) allocated to the period. The Company allocates the expected premium receipts to each period of coverage on the basis of the passage of time; but if the expected pattern of release of risk during the coverage period differs significantly from the passage of time, then on the basis of the expected timing of incurred insurance service expenses.

The Company changes the basis of allocation between the two methods above as necessary, if facts and circumstances change. The change is accounted for prospectively as a change in accounting estimate.

With regard to reinsurance contracts held, the Company presents separately in the Statement of Profit or Loss the income from reinsurance contracts held. Accordingly, this line item includes amounts of losses recoverable from the reinsurer, including reinsurance commissions that relate to claims.

Contracts not measured under the PAA

The Company recognizes insurance revenue as it provides services under groups of insurance contracts. For contracts measured under the GMM or VFA, the insurance revenue relating to services provided for each reporting period represents the total of the changes in the LRC that relate to services for which the Company expects to receive consideration, and comprises of the following items:



- A release of the CSM, measured based on coverage units provided.
- Changes in the risk adjustment for non-financial risk relating to current services.
- Claims and other insurance service expenses incurred in the year, generally measured at the amounts expected at the beginning of the year, excluding amounts allocated to a potential loss component, repayments of investment components, insurance acquisition expenses, and amounts that relate to transaction-based taxes collected on behalf of third parties.
- Other amounts, including experience adjustments for premium receipts for current or past services.

With regard to reinsurance contracts held, this item includes the amounts recovered from the reinsurer, including also the amount of losses recovered on insurance contracts and changes in fulfilment cash flow for recoverable amounts, resulting from changes in the risk of non-performance of the reinsurer.

2.9.12 Insurance Service Expenses from insurance contract issued or from reinsurance contracts held

Insurance service expenses arising from insurance contracts are recognized in the income statement generally as they are incurred. They exclude repayments of investment components and comprise of the following items:

- Incurred claims and other insurance service expenses
- Amortisation of insurance acquisition cash flows on a straight-line basis over the coverage period of the group of contracts.
- Losses on onerous contracts and reversals of such losses
- Adjustments to the liabilities for incurred claims that do not arise from the effects of the time value of money, financial risk and changes therein.
- Impairment losses on assets for insurance acquisition cash flows and reversals of such impairment losses.

With reference to reinsurance contracts held measured under the PAA, the Company separately presents expenses for the period, which are represented by the allocation of the premiums paid in the period, net of any not contingent on claims ceding commissions. For reinsurance contracts held measured under the GMM, the line item of insurance service expenses includes:

- A release of the net gain or net cost from purchasing reinsurance, measured based on coverage units provided.
- Changes in the risk adjustment for non-financial risk relating to current services.
- Claims and other insurance service expenses recovered in the year, generally measured at the amounts expected at the beginning of the year. Other amounts, including experience adjustments for premiums paid for current or past services.
- Changes in fulfilment cash flow resulting from changes in the risk of non-performance of the reinsurer are not related to future service and do adjust the contractual service margin.

2.9.13 Net Finance Income or Expense from insurance contracts issued and reinsurance contracts held

Net finance income or expenses comprise of the change in the carrying amount of the group of insurance contracts and reinsurance contracts held arising from:

- The effect of the time value of money and changes in the time value of money; and
- The effect of financial risk and changes in financial risk.

Such changes for groups of direct participating contracts are allocated to a loss component and included in insurance service expenses, as well.

With reference to finance income or expenses arising from reinsurance contracts held, this also includes value adjustments connected with the expected losses arising from the risk of default by the reinsurer.

The Company has elected to disaggregate (re)insurance finance income or expenses between profit or loss and other comprehensive income (OCI) for the majority of its portfolios measured under GMM and PAA, with the resulting impact of changes in market interest rates on the value of the insurance and related reinsurance assets and liabilities being reflected in OCI. The OCI option is also applied to portfolios of reinsurance contracts held.

For contracts measured under VFA the OCI option was not elected since underlying items are measured under Fair Value through Profit or Loss.

For portfolios of insurance contracts for which disaggregation option is elected, the method for allocation insurance finance income or expenses is determined as follows:

- For groups of insurance contracts accounted for under the GMM, the systematic allocation for the finance income or expenses is determined using the discount rates by which estimated future cash flows have been discounted on initial recognition, i.e., the "locked-in" interest rate.
- For groups of insurance contracts accounted for under the PAA, the systematic allocation for the finance income or expenses is determined using the discount rates at the date of the incurred claim, i.e., the "locked-in" interest rate based on accident year.

2.10 Sale and repurchase agreements

Securities sold subject to a commitment to repurchase them at a predetermined price ('Repos') are retained on the statement of financial position and the counterparty liability is included in amounts due to banks, due to customers or other deposits, as appropriate.

2.11 Property and equipment, including right of use assets (ROU).

Property and equipment include land and buildings, leasehold improvements and transportation and other equipment, held by the Company for use in the supply of services or for administrative purposes. Property and equipment are initially recorded at cost, which includes all costs necessary to bring an asset into operating condition. ROU assets are presented together with property and equipment in the statement of financial position.

Subsequent to initial recognition, property and equipment are measured at cost less accumulated depreciation and accumulated impairment losses. Costs incurred subsequent to the acquisition of an asset which is classified as property and equipment are capitalised only when it is probable that they will result in future economic benefits to the Company beyond those originally anticipated for the asset, otherwise they are expensed as incurred.

Depreciation of an item of property and equipment begins when the asset is available for use and ceases only when the asset is derecognized. Therefore, the depreciation of an asset that is retired from active use does not cease unless it is fully depreciated, but its useful life is reassessed. Property and equipment are depreciated on a straight-line basis over their estimated useful lives as follows:

Land	No depreciation
Buildings (own-used)	Not exceeding 50 years
Buildings (investment)	Not exceeding 50 years
Leasehold improvements	Residual lease term, not exceeding 12 years
Furniture and related equipment	Not exceeding 12 years
Motor vehicles	Not exceeding 10 years
Hardware and other equipment	Not exceeding 5 years
ROU assets	On a straight-line basis over the lease term

At each reporting date the Company assesses whether there is any indication that an item of property and equipment and right of use assets may be impaired. If any such indication exists, the Company estimates the recoverable amount of the asset. Where the carrying amount of an asset exceeds its estimated recoverable amount, it is written down to its recoverable amount. Gains and losses on disposal of property and equipment are determined by reference to their carrying amount and are taken into account in determining profit or loss before tax.

2.12 Investment property

Investment property includes land and buildings owned by the Company (or held through a finance lease agreement) with the intention of earning rent or for capital appreciation or both, and is initially recorded at cost, which includes transaction costs.

Subsequent to initial recognition, investment property is measured at cost less accumulated depreciation and any accumulated impairment losses.

Investment property is depreciated on a straight-line basis over its estimated useful life, which approximates the useful life of similar assets included in property and equipment. Investment property is reviewed for impairment when there is an indication of impairment or at least on an annual basis.

2.13 Goodwill, software, and other intangible assets

2.13.1 Goodwill

Subsequent to initial recognition, goodwill is stated at cost, as established at the date of acquisition (see Note 2.5.2 “Business combinations - Goodwill”) less accumulated impairment losses.

Goodwill is allocated to cash-generating units (“CGUs”) for the purpose of impairment testing. The allocation is made to those cash-generating units that are expected to benefit from the business combination in which the goodwill arose.

The Company assesses goodwill for possible impairment annually or more frequently if there are indications for impairment. The assessment involves estimating whether the carrying amount of the goodwill remains fully recoverable. When making this assessment the Company compares the carrying value of the CGU to which the goodwill is allocated against its recoverable amount, which is the higher of fair value less cost to sell and value in use. Fair value is estimated by reference to market value, if available, or is determined by a qualified valuer or pricing model. If the recoverable amount is less than the carrying amount, an irreversible impairment loss is recognized, and the goodwill is written down by the excess of the carrying amount of the unit over its recoverable amount.

2.13.2 Software

Software includes costs that are directly associated with identifiable and unique software products controlled by the Company that are anticipated to generate future economic benefits exceeding costs beyond one year. Expenditure, which enhances or extends the performance of computer software programs beyond their original specifications is recognized as a capital improvement and added to the original cost of the software.

Software is amortised using the straight-line method over the useful life, not exceeding a period of 5 years.

In particular, **for internally generated software**, the amount initially recognized is the sum of the expenditure incurred from the date when the intangible asset first meets the recognition criteria. Where no internally generated intangible asset can be recognized, development expenditure is charged to profit or loss in the period in which it is incurred.

Research costs are expensed as incurred. An internally generated software arising from development expenditure incurred on an individual project is recognized only when the Company can demonstrate:

- the technical feasibility of completing the internally generated software so that it will be available for use;
- its intention to complete and use the asset;
- the ability to use the asset;
- how the asset will generate future economic benefits;
- the ability of adequate technical, financial and other resources to complete the development and use the asset and
- the ability to measure reliably the expenditure during development.

Following the initial recognition of the development expenditure, the cost model is applied requiring the asset to be carried at cost less any accumulated amortization and impairment losses.

Expenditure on starting up an operation or branch, training personnel, advertising and promotion and relocating or reorganizing part or the entire Company is recognized as an expense when it is incurred.

2.13.3 Impairment

At each reporting date, management reviews intangible assets and assesses whether there is any indication of impairment. If such indications exist an analysis is performed to assess whether the carrying amount of intangible assets is fully recoverable. A write-down is made if the carrying amount exceeds the recoverable amount.

2.14 Leases

The Company, at the inception of a contract, assesses whether the contract is or contains a lease by examining whether the Company has the right to control the use of an identified asset for a period of time obtaining substantially all the economic benefits from the use of the asset in exchange for a consideration.



2.14.1 The Company is the lessee

The Company applies a single recognition and measurement approach for all leases, except for short-term leases and leases of low-value assets for which lease payments are recognized as operating expenses on a straight-line basis over the lease term.

At the commencement date of the lease, the Company:

1. Recognises a right of use ("RoU") asset representing the Company's right to use the underlying asset in the statement of financial position.
2. Recognises a lease liability that represents the present value of the Company's obligation to make lease payments over the lease terms in the statement of financial position.
3. Recognises depreciation on the RoU asset.
4. Reviews the RoU assets for impairment whenever events or circumstances indicate that the carrying amount may not be recoverable over the remaining life. Any impairments are charged to the profit or loss.
5. Recognises interest expense on the lease liabilities in the profit or loss.
6. Separates the total amount of cash paid into the principal portion presented within financing activities and the accrued interest expense portion presented within operating activities in the cash flow statement.

2.14.2 Right of Use assets (RoU)

As stated above, the Company recognizes RoU assets at the commencement date of the lease (i.e. the date the underlying asset is available for use). RoU assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any re-measurement of lease liabilities. The cost of RoU assets includes the amount of lease liabilities recognized, initial direct costs incurred, restoration costs and lease payments made at or before the commencement date less any lease incentives received. RoU assets are depreciated on a straight-line basis over the lease term.

RoU assets are presented in "Property & Equipment".

2.14.3 Lease liabilities

At the commencement date of the lease, the Company recognises lease liabilities measured at the present value of the future lease payments, discounted using the rate implicit in the lease or, if this rate cannot be readily determined, the lessee's incremental borrowing rate (IBR). The IBR is the rate of interest that the Company would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the RoU asset, in a similar economic environment

The lease payments include fixed payments (less any lease incentives receivable), variable lease payments that depend on an index or a rate, and amounts expected to be paid under residual value guarantees. The lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Company and payments of penalties for terminating the lease, if the lease term reflects exercising the option to terminate. Variable lease payments that do not depend on an index or a rate are recognized as expenses in the period in which the event or condition that triggers the payment occurs. The lease liability is remeasured when there is a change in future lease payments arising from a change in an index or a rate, if there is a change in the Company's estimate of the amounts expected to be payable under a residual value guarantee, or if the Company changes its assessment of whether it will exercise a purchase, extension or termination option. When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the RoU asset, or is recorded in profit or loss if the carrying amount of the RoU asset has been reduced to zero.

2.14.4 Short-term leases and leases of low-value assets

The Company has elected not to recognize RoU assets and lease liabilities for short-term leases that have a lease term of 12 months or less and leases of low-value assets (less than €5,000). The Company recognizes the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

2.14.5 The Company is the lessor

Finance lease: When assets are leased out under a finance lease, the present value of the minimum lease payments is recognized as a receivable. Lease income is recognized over the term of the lease using the net investment method (before tax), which reflects a constant periodic rate of return. Finance lease receivables are included in loans and advances to customers.

Operating lease: Non-financial assets leased out under operating leases are included in the statement of financial position based on the nature of the asset. They are depreciated over their useful lives on a basis consistent with similar owned property. Rental income (net of any incentives given to lessees) is recognized on a straight-line basis over the lease term.

2.15 Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents include cash on hand, unrestricted balances held with central banks, amounts due from other banks and highly liquid financial assets with original maturities of less than three months from the date of acquisition, such as treasury bills and other eligible bills and investment securities, which are subject to insignificant risk of changes to fair value and are used by the Company in the management of its short-term commitments.

2.16 Provisions

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

The amount recognized as a provision shall be the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. The best estimate of the expenditure required to settle the present obligation is the amount that an entity would rationally pay to settle the obligation at the end of the reporting period or to transfer it to a third party at that time.

2.17 Financial guarantee contracts

A financial guarantee contract is a contract that requires the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument.

A financial guarantee contract, other than those assessed as insurance contracts, is recognized initially at their fair value and subsequently measured at the higher of (a) the unamortized balance of the related fees received and deferred, and (b) the best estimate of the amount required to settle the guarantee at the reporting date.

2.18 Employee benefits

The Company operates post-employment benefit plans, which are classified as defined benefit and defined contribution plans.



2.18.1 Defined benefit plans

A defined benefit plan is a post-employment benefit plan that defines an amount of benefit to be provided, determined using a number of financial and demographic assumptions. The most significant assumptions are the discount rate, inflation, expected salary increases and life expectancy. For defined benefit plans, the liability is the present value of the defined benefit obligation as at the reporting date.

The defined benefit obligation and the related costs are calculated by independent actuaries on an annual basis at the end of each annual reporting period, using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high quality corporate bonds or government bonds that are denominated in the currency in which the benefits will be paid and, which have terms to maturity approximating the terms of the related liability, or for currencies for which there is no deep market in such high quality corporate bonds, the market yields (at the end of the reporting period) on government bonds denominated in that currency shall be used. Net interest is calculated by applying the discount rate at the beginning of the period to the net defined liability/(asset).

Retirement benefits are attributed only to periods in which the obligation to provide post-employment benefits arises.

Service cost (current service cost, past service cost (including the effect of curtailments) and gains or losses on settlements) and net interest on the net defined benefit liability/(asset) are charged to profit or loss and are included in staff costs. The defined benefit obligation is recorded on the statement of financial position, with changes resulting from re-measurements (comprising actuarial gains and losses recognized immediately in other comprehensive income net of tax, with no subsequent recycling to profit or loss, in order to fully reflect the full value of the plan deficit or surplus.

2.18.2 Defined contribution plans

A defined contribution plan is a post-employment benefit plan under which the Company pays fixed contributions and has no legal or constructive obligations to pay further contributions. The aforementioned contributions are charged in the Income Statement in the year to which they relate and are reported within personnel costs.

2.18.3 Termination benefits

Termination benefits are employment benefits provided in exchange for the termination of an employee's employment as a result of either (a) an entity's decision to terminate an employee's employment before the normal retirement date, or (b) an employee's decision to accept an offer of benefits in exchange for the termination of employment (including the voluntary exit schemes offered by the Company to its personnel).

As far as the recognition of the termination benefits is concerned, the Company recognises a liability and an expense at the earlier of the following dates:

- (a) when it can no longer withdraw the offer of those benefits; and
- (b) when it recognises costs for a restructuring that involves the payment of termination benefits.

In the case of an offer made to encourage voluntary redundancy, the termination benefits are measured based on the number of employees expected to accept the offer. Termination benefits falling

2.19 Income taxes

Income tax on profits is determined in accordance with tax laws currently in force and is recognized as an expense in the period in which taxable profits arise.

Deferred tax is measured, using the liability method, on all temporary differences arising between the carrying amounts of assets and liabilities included in the Financial Statements and their respective tax basis amounts.

The principal temporary differences arise from revaluation of certain financial instruments, including securities and derivatives, insurance reserves, provisions for defined benefit obligations and other post-retirement benefits and property and equipment. Deferred tax assets relating to unused tax losses carried forward are recognized to the extent that it is probable that sufficient taxable profits will be available in the future against which these deductible temporary differences can be utilised.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realised or the liability is settled, based on laws that have been enacted or substantially enacted at the reporting date.

Deferred tax assets and liabilities are not recognized if the temporary differences arise from the initial recognition of goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profits nor the accounting profits.

Recognition of deferred tax assets is based on management's belief that it is probable that the tax benefits associated with certain temporary differences, such as tax losses carried forward and tax credits, will be realized, based on all available evidence. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. In making such determination, the Company considers all available positive and negative evidence, including future reversals of existing taxable temporary differences, projected future taxable income and recent financial results. In the event the Company were to determine that it would be able to realize their deferred tax assets in the future in excess of their recorded amount, it would make an adjustment to increase the carrying amount of deferred tax assets.

Current and deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current income tax advances against current income tax liabilities and when they relate to income taxes levied by the same taxation authority and the management intends to settle its current tax assets and liabilities on a net basis.

Deferred income tax is recognized for temporary differences arising from investments in subsidiaries, associates and joint ventures, except where the timing of the reversal of the temporary difference can be controlled by the Company and it is probable that the difference will not reverse in the foreseeable future.

Deferred tax assets or liabilities related to:

- changes in the fair value of financial instruments classified at Fair Value through Other Comprehensive Income (FVOCI) under IFRS 9,
- the effect of changes in market interest rates on the value of insurance and related reinsurance assets and liabilities recognized in OCI under IFRS 17, and
- actuarial gains and losses for Defined Employee Benefits,

are also recognized in Other Comprehensive Income (OCI), either as a charge or credit, and are recognized in profit or loss when the related gains or losses are transferred to profit or loss, where this is permitted or required by the relevant accounting standard.



2.20 Share capital

Equity: Financial instruments issued by Group companies to obtain funding are classified as equity when, based on the substance of the transaction, the Group does not undertake a contractual obligation to deliver cash or another financial asset or to exchange financial instruments under conditions that are potentially unfavorable to the issuer.

Share issue costs: Incremental external costs directly attributable to the issue of shares and other equity items, other than on a business combination, are deducted from equity after measuring the corresponding income tax.

Dividends on ordinary shares: Dividends on ordinary shares are recognized as a liability in the period in which they are approved by the Company's Shareholders at the Annual General Meeting.

Share premium: It includes the difference between the nominal value of the shares and the consideration received in the case of a share capital increase.

2.21 Assets and liabilities held for sale

Non-current assets and disposal groups are classified as held for sale if their carrying amount will be recovered principally through a sale transaction rather than through continuing use.

This condition is regarded as met only when the sale is highly probable and the asset (or disposal group) is available for immediate sale in its present condition.

Management must be committed to the sale, which should be expected to qualify for recognition as a completed sale within one year from the date of classification except as permitted by IFRS 5, and actions required to complete the plan should indicate that it is unlikely that significant changes to the plan will be made or that the plan will be withdrawn.

Non-current assets held for sale on initial classification are measured at their lower of carrying amount and fair value less costs to sell. Assets and liabilities of disposal groups classified as held for sale and non-current assets classified as held for sale are shown separately on the face of the statement of financial position.

Impairment losses on initial classification as held for sale are included in profit or loss, even when there is a revaluation. The same applies to gains and losses on subsequent re-measurement.

If the Company has classified an asset (or disposal group) as held for sale, but the criteria for classification as such are no longer met, the Company ceases to classify the asset (or disposal group) as held for sale.

The Company measures a non-current asset (or disposal group) that ceases to be classified as held for sale (or ceases to be included in a disposal group classified as held for sale) at the lower of:

(a) its carrying amount before the asset (or disposal group) was classified as held for sale, adjusted for any depreciation or amortization that would have been recognized had the asset (or disposal group) not been classified as held for sale, and

(b) its recoverable amount at the date of the subsequent decision not to sell.

2.22 Related party transactions

Related parties include the following:

- The Company's subsidiaries and associates
- The Company's joint ventures and their subsidiaries
- The Company's immediate parent, intermediate parent, ultimate parent, their subsidiaries and associates
- The Company's Key Management Personnel, being the members of the Company's Board of Directors and Executive Committee, the Company's Chief Compliance and Corporate Governance Officer, and the CEOs of the Company's subsidiaries, immediate, intermediate and ultimate parents
- Close family members of the Company's Key Management Personnel
- Entities having transactions with the Company, that are controlled or jointly controlled by the Key management Personnel and their close family members.

2.23 Revenue recognition

Revenues are accounted for to the extent that it is probable that the economic benefits related to the transaction will flow to the Company, and based on their nature are recognized as follows:

Insurance contracts - Revenue from insurance contracts is recognized as described in note 2.9.11

Interest - Interest income is recognized as interest accrues using the effective interest rate.

Dividends - Dividend income is recognized when the right to receive payment is established by the shareholders, i.e. following approval by the Annual General Meeting.

Rental income - Rental income from investment property is recognized on a systematic basis throughout the lease period.

2.24 Off - setting

Financial assets and liabilities are offset and the net amount is reported in the statement of financial position when, and only when there is a legally enforceable right to offset the recognized amounts and there is an intention to realize the asset and settle the liability simultaneously or on a net basis.

2.25 Share-based payments

The Company applies IFRS 2 Share-based Payments in accounting for employee remuneration in the form of shares. The Company operates equity-settled compensation plans. Employee incentives include awards in the form of shares and share options.

The fair value of the employee share options and other equity settled share-based payments is calculated at the grant date and recognized as an expense over the vesting period. The number of shares and options expected to vest takes into account the likelihood that performance and service conditions included in the terms of the awards will be met.

At each balance sheet date, the Company revises its estimates of the number of shares and awards that are expected to vest. It recognises the impact of the revision of original estimates, if any, in the income statement and a corresponding adjustment to equity over the remaining vesting period.

The fair value of shares is the market price ruling on the grant date. The fair value of options granted is determined using option pricing models to estimate the numbers of shares likely to vest. These take into account the exercise price of the option, the current share price, the risk-free interest rate, the expected volatility of the share price over the life of the option and other relevant factors.



Note 3: Management Critical Accounting Judgements and Estimates

The preparation of Financial Statements in accordance with IFRS requires the use of estimates and assumptions that may affect the reported amount of assets liabilities, income and expense in the Company’s Financial Statements as well as disclosures on contingent assets and liabilities. The use of available information and the application of judgement are inherent in the formation of estimates in the following areas: valuation of securities not traded in regulated markets, post-retirement benefits, insurance and reinsurance liabilities/assets, impairment of receivables, unaudited tax years and pending litigation. The results of the actual future events may differ materially from the above estimates. The management of the Company is certain that the estimates and the assumptions that have been carried out for the preparation of the Company’s Financial Statements reflect fully the events and the conditions as of 31 December 2025 Significant accounting estimates and related uncertainty: The Company performs the key estimates and assumptions related to implementation of the IFRS on the below important cases:

Significant accounting estimates and related uncertainty:

The Company performs the key estimates and assumptions related to implementation of the IFRS on the below important cases:

3.1 Estimates and Assumptions used in the measurement of insurance contracts

The Company primarily uses approved actuarial methods that include assumptions about future investment yields, mortality, lapsation, expenses, options and guarantees, morbidity and terminations. Insurance contract liabilities are estimated based on facts existing at the contract issue date. Deviation from such estimates are anticipated within a margin of safety.

Moreover, a number of statistical techniques are used for the estimation of the ultimate cost of claims incurred and the calculation of the corresponding reserves. These techniques are based on historical data for determining the ultimate cost and on assumptions related to average claim cost, future inflation and changes in the underlying legal framework.

More specifically, in applying IFRS 17 measurement requirements, the following inputs and methods were used that include significant estimates:

Discount rates

Insurance liabilities and reinsurance contracts held, measured under GMM and PAA are calculated by discounting expected future cash flows at a risk-free rate, plus an illiquidity premium where applicable.

The discount rates applied for the discounting of future cash flows are presented in the table below. For further analysis regarding the discount rate assumptions, reference is made to Note 2.9.6

		Portfolio duration									
		1 year		3 years		5 years		10 years		20 years	
		2025	2024	2025	2024	2025	2024	2025	2024	2025	2024
GMM	EUR	2.44%	2.61%	2.54%	2.52%	2.64%	2.51%	2.86%	2.55%	3.16%	2.61%
PAA	EUR	2.48%	3.00%	2.57%	2.91%	2.68%	2.90%	2.90%	2.94%	3.20%	3.00%
VFA	EUR	2.08%	2.24%	2.17%	2.14%	2.28%	2.14%	2.50%	2.18%	2.80%	2.24%

Estimates of future cash flows to fulfil insurance contracts

Included in the measurement of each group of contracts within the scope of IFRS 17 are all of the future cash flows within the boundary of each group of contracts (contract boundary is presented in Note 2.9.10). The estimates of these future cash flows are based on probability-weighted expected future cash flows. The Company estimates which cash flows are expected and the probability that they will occur as at the measurement date. In making these expectations, the Company uses information about past events, current conditions and forecasts of future conditions. The Company estimate of future cash flows is the mean of a range of scenarios that reflect the full range of possible outcomes. Each scenario specifies the amount, timing and probability of cash flows. The probability-weighted average of the future cash flows is calculated using a deterministic scenario representing the probability-weighted mean of a range of scenarios.

Where estimates of expenses-related cash flows are determined at the portfolio level or higher, they are allocated to groups of contracts on a systematic basis, such as activity-based costing method. The Company has determined that this method results in a systematic and rational allocation. Similar methods are consistently applied to allocate expenses of a similar nature. Expenses of an administrative policy maintenance nature are allocated to groups of contracts based on the number of contracts in force within groups.

Acquisition cash flows and claims management expenses are typically allocated to groups of contracts using systematic and rational methods (eg gross written premiums, number of claims etc).

For the Life Risk and Savings contracts, uncertainty in the estimation of future claims and benefit payments and premium receipts arises primarily from the unpredictability of long-term changes in the mortality rates, the variability in policyholder behavior, and uncertainties regarding future inflation rates and expenses growth.

For Non-Life contracts, uncertainty in the estimation of future claims and benefit payments arises primarily from the severity and frequency of claims and uncertainties regarding future inflation rates leading to claims and claims-handling expenses growth.

Assumptions used to develop estimates about future cash flows are reassessed at each reporting date and adjusted where required.

Additional information for estimates and judgements used in the determination of future cash flows, including acquisition costs, are presented in Note 2.9.

Significant methods and assumptions used are discussed below.

Long-Term Life Portfolios of insurance contracts

This category includes life risk & savings portfolios measured under General Measurement Model and participating portfolios measured under Variable Fee Approach. Insurance Contract liability for life insurance operations (long-duration contracts) are estimated using approved actuarial methods that include assumptions about future investment yields, mortality, lapsation, expenses, options and guarantees, morbidity and terminations. Insurance contract liabilities are estimated based on facts existing at the contract issue date. Deviation from such estimates are anticipated within a margin of safety. Subsequent valuations at each reporting date determine whether the reserves are adequate in the light of the current estimates. The management of the Company observes on a continuing basis the estimates of the outstanding claims in order to reflect the current economic conditions.



Short-Term Life & Health and Non-Life Insurance

In addition to the case-by-case procedure, a number of statistical techniques are used for the estimation of the ultimate cost of claims incurred and the calculation of the corresponding reserves. These techniques are based on historical data for determining the ultimate cost and on assumptions related to average claim cost, future inflation and changes in the underlying legal framework. The process includes the calculation of the provision for claims that have not been reported to the Company until the estimation date.

3.2 Methods used to measure the risk adjustment for non-financial risk

The risk adjustment for non-financial risk is the compensation that is required for bearing the uncertainty about the amount and timing of cash flows that arises from non-financial risk as the insurance contract is fulfilled. Because the risk adjustment represents compensation for uncertainty, estimates are made on the degree of diversification benefits and expected favourable and unfavourable outcomes in a way that reflects the Company’s degree of risk aversion.

Additional information for estimates and judgements used in the determination of future cash flows, relevant confidence level, are presented in Note 2.9.6.

3.3 Contractual Service Margin: Determination of coverage units

The amount of CSM recognized in profit and loss to reflect services provided each year is determined by considering for each group of contracts coverage units that reflect the quantity of benefits provided in each period and the expected coverage period. The coverage units are reviewed and updated at each reporting period.

The coverage units used by major product lines are:

Product description	Insurance Element		
	Traditional	Unit Linked	Medical Rider (if applicable)
Deferred Annuity products with Premium Refund in case of death	Surrender value	-	Average severity
Pure Endowment with premium refund in case of death	max between surrender value and death benefit	-	Average severity
Unit Linked with guaranteed benefits at maturity	Additional sum assured (if applicable)	Unit Fund before maturity and guaranteed benefit at maturity date	Average severity
Unit Linked without guarantees	-	max between surrender value and death benefit	-
Protection Plans, Whole Life & Term Assurance	max between fixed death benefit and surrender Value	-	Average severity

Additional analysis on the methodology adopted is described in Note 2.9.6

3.4 Provision for income tax

In accordance with IAS 12, the income tax provision is determined by estimating the tax to be paid to the tax authorities and includes an estimation of current income tax for each year and a provision for additional taxes that may arise in the event of any tax audit. The settlement of income taxes may differ from the corresponding amount recognized in the Financial Statements.

3.5 Deferred tax

Deferred tax assets on deductible temporary differences and carried forward tax losses are recognized to the extent that future taxable profit will be adequate to set off the aforementioned tax losses and deductible temporary differences. Judgement is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and level of future taxable profits, together with future tax-planning strategies.

The management of the Company considers that the recovery of the recognized deferred tax assets on December 31, 2025, is highly probable. The aforementioned estimation that future taxable profits will offset any increase of the deferred tax asset is based on the approved by the Board of Directors business plan. The assessment was carried out based on existing prevailing tax legislation at the balance sheet date.

3.6 Impairment loss allowance on financial assets

The calculation of ECL allowance under IFRS 9 for debt instruments measured at amortized cost and FVOCI requires the Group to make a number of judgements and estimates. The most significant are set out below:

- Establishing the criteria for a significant increase in credit risk (SICR) since initial recognition such that a loss allowance for lifetime rather than 12-month ECL is required. In doing so, the Group uses both quantitative and qualitative criteria.
- Estimation of forward-looking modelled parameters (PD, LGD and EAD).
- Determining an appropriate definition of default against which a probability of default, exposure at default and loss given default parameter can be evaluated.

Further information on the calculation of ECL allowances is set out in note 2.7.4.

3.7 Impairment of property, plant and equipment and investment property

At the end of each period, the Company assesses evidence of impairment for their property, comparing the carrying value of their assets with their fair value, as determined by certified independent valuers. The fair value is calculated on the basis of the value of similar property in the same area and of future income from active lease contracts for the specific property. A decline in the fair value below its cost is considered to be evidence of impairment. In the event of investment or vacant property, its carrying value should be adjusted to the fair value, which is considered to be recoverable. With regard to property used by the Company itself, the recoverable amount is determined on the basis of the value in use for the Company, while an impairment loss is recognized only if the recoverable amount is less than the carrying amount.



3.8 Fair value of financial instruments

The fair values of financial instruments that are not quoted in active markets are determined by using valuation methods.

The Company measures its investments in Private Equity Funds at their fair value, based on the most recent financial statements of each fund, which are prepared in accordance with IFRS.

Although a significant degree of judgment is, in some cases, required in establishing fair values, management believes the fair values recorded in the statement of financial position and the changes in fair values recorded in the income statement are prudent and reflective of the underlying economics, based on the controls and procedural safeguards employed.

3.9 Cost of defined benefit plans

The net cost of defined benefit plans is actuarially determined using assumed discount rates, rates of compensation increase, and staff turnover. The discount rate is based on yields of high-quality corporate bonds taking account of the maturities of the defined benefit obligations. The compensation increase is determined by reviewing the Company's salary increases each year, whereas the staff turnover assumption is based on historical experience of employee turnover rates, adjusted for any future expectations taking into account factors such as employee length of service and economic conditions.

Note 4: Insurance And Financial Risk Management

4.1 Risk management framework

The Company considers an effective risk management framework to be a key factor in mitigating its exposure to risk and protecting shareholders and customers.

To this end, the Company adopts risk management practices and methodologies, taking into account all relevant guidelines and requirements set by the Regulatory Authority - Bank of Greece - and the competent authorities supervising the Company's entities.

The risks covered by the risk management framework at a minimum are as follows:

- Insurance risk, including reinsurance (4.2)
- Credit risk (4.3)
- Liquidity risk (4.4)
- Market risk (4.5)

- Concentration risk (4.6)
- Operational risk (4.7)
- Strategic risk (4.8)
- Reputation risk (4.9)
- Capital management (4.10)
- Sustainability risk (4.11)

Risk management procedures include risk identification, measurement, monitoring, control and reporting. The Company measures risks, taking also into account the provisions of the Solvency II regulatory framework.

In this context, a Board Risk Committee, an Asset - Liability Committee and a Risk Management Division have been established.

The risk management framework is complemented by other specialized Divisions, such as the Compliance and Corporate Governance Division, the Actuarial Division and the Internal Audit Division, which report directly to the Board through the Audit Committee and review the risk management framework.

4.1.1 Board Risk Committee

The Committee consists of at three (3) non-executive Board Members, two (2) of whom are independent non-executive Members. An independent non-executive Member is appointed Chair of the Committee. The Chair and the Members of the Committee are appointed by the BoD and possess adequate knowledge and experience in risk management.

Key Committee objectives include:

1. the development of a comprehensive risk appetite and capital management strategy, which will cover all risk types, aligned with the Company's business strategy, and corresponding to the adequacy of available technical and human resources;
2. the development of an appropriate risk management framework that will encompass strategies, policies, procedures, methods, systems, and reports, and will ensure that efficient mechanisms are in place to identify, assess and effectively manage risks of any type that result from the operations Company and its subsidiaries;
3. the cultivation of a risk management culture across the Company and its subsidiaries.
4. aligning and coordinating all Subsidiaries with the requirements of the Company's risk management framework.

The following responsibilities are indicatively mentioned:

- The Committee reviews and recommends to the BoD for approval the risk appetite and risk management strategy, along with the relevant risk management Policies, in alignment with the business objectives and the own risk and solvency assessment (ORSA).
- The Committee annually reviews the aforementioned strategy along with the policies/charters overseen by the Risk Management Division and the Actuarial Division and recommends their revision if deemed necessary. It monitors their implementation and recommends to the BoD modifications to the risk management framework whenever deemed necessary.
- The Committee regularly monitors and assesses the Company's risk profile, ensuring that all risks have been adequately identified and assessed and that the Company's risk profile is in line with the risk appetite.

4.1.2 Risk Management Division

The risk Management Division supports the BRC and Management in developing and effectively operating the risk management framework. Specifically, it aims at:

- Supporting the Board of Directors in the setup and operation of an effective risk management framework.
- Assessing, monitoring, controlling, and reporting all material risks, taking into account the risk appetite.
- Proposing risk management policies and their revision, if deemed necessary.
- Proposing, along with other Units, mitigation measures for the adjustment of risks undertaken within acceptable levels, in line with the risk appetite.

4.1.3 Asset – Liability Management

The asset/ liability management policy aims at shaping the balance sheet in such a way so as to mitigate liquidity risk and reduce the exposure to interest rate and other market risks.

In this context, an Assets-Liabilities Committee ("ALCO") has been established, authorized by the Board of Directors of the Company, in order to implement the Group's strategy and policy in terms of structure and management of Assets and Liabilities (Asset Liability Management), taking into account the current financial conditions in the markets, the defined risk limits set and the regulatory framework.

The Committee consists of at least 6 members and meets once every two months or whenever deemed necessary by its Chairman.

Asset and liability management is performed by the Investment Management & Real Estate Division.

4.2 Insurance risk

Insurance contracts issued by the Company are subject by nature to insurance risk. Insurance risk arises from contractual obligations of the Company to pay claims under insurance policies. Insurance risk includes uncertainties related to claim frequency, severity and timing of insured events.

Insurance risk is identified in the underwriting of insurance risk, as well as in the creation of insurance technical provisions. The main sources of insurance risk are considered to be deviations from the expected levels of claims, expenses, concentration (geographical, risk, product, etc.), from insufficient pricing. Depending on the insurance product, this risk is influenced by changes in macroeconomic factors, such as interest rates, inflation, unemployment, and other factors such as changes in customers' behavior, changes in biometric parameters of mortality, disability and morbidity, pandemics and catastrophic events such as earthquakes, industrial disasters, fires, riots or terrorism.

Insurance risk exposures are mitigated by the diversification of the insurance portfolio across different Lines of Business and a large number of insurance contracts and insureds. Mitigation is further enhanced with the careful selection and implementation of the Company's underwriting policy and reinsurance strategy and internal guidelines, within the overall risk management framework, principles and predefined procedures for the calculation of technical provision that take into account the appropriate accounting and actuarial standards in force, as well as best practices. Pricing is based on assumptions and statistics and the Company's empirical data, taking into consideration current trends and market conditions and past experience.

Reinsurance arrangements include facultative, treaty (proportional or other) and catastrophe coverage.

4.2.1 Life insurance contracts

Life insurance contracts written by the Company include whole life, endowment, term assurance with survival benefit, pension, Unit-Linked and rider benefits attached to insurance contracts.

The main risks that the Company is exposed to under Life insurance contracts are the following:

- **Mortality risk:** risk of loss arising due to policyholder actual death experience being different than expected.
- **Longevity risk:** risk of loss arising due to the annuitant living longer than expected.
- **Expense risk:** risk of loss arising from expense experience being different than expected.
- **Lapse/Surrender risk:** risk of loss arising due to policyholder behavior (lapses and surrenders) being different than expected.
- **Morbidity/Disability risk:** the risk arising from differences between estimated and actual experience.
- **Catastrophe risk: risk of loss arising from catastrophic events, such as pandemics.**

The Company has also significant exposure to contracts with guaranteed return on lapse or on maturity

Key assumptions

- Life insurance policy estimates are initially made at inception of the policy, when the Company's determines the key assumptions applicable to the type of life insurance policy, such as future deaths, voluntary terminations, investment returns and administration expenses in the context of onerosity test and determination of Contractual Service Margin (CSM).
- Subsequently, new estimates are developed at each reporting date to determine the Fulfilment cash flows (FCF) as well as the revised CSM.
- The key assumptions to which the estimation of FCF is particularly sensitive are the following:
- **Mortality:** Assumptions are based on appropriate standard industry and national tables, according to the type of contract written, reflecting the recent historical experience of the Company and thus reflecting the best estimate for that year. Assumptions are differentiated by sex and type of insurance plan.
- **Attributable Expenses:** Operating expenses assumptions reflect the projected costs of maintaining and servicing in-force contracts. The current level of expenses, as at 31 December 2025, is taken as an appropriate expense base, adjusted for expected expense inflation if appropriate.
- **Lapse and surrender rates:** Lapses relate to the termination of contracts due to non-payment of premiums. Surrenders relate to the voluntary termination of contracts by policyholders. Policy termination assumptions are determined using historical statistical measures based on the Company's experience and vary by product type and distribution channel.
- **Rate that option to surrender is exercised at the beginning of retirement:** The percentage of policyholders in individual insurance programs which elect for a lump-sum benefit (surrender value) instead of a monthly pension benefit, which is estimated based on the Company's past experience.
- **Disability:** Disability percentages for life riders with benefits in the event of disability of the policyholder are based mainly on the corresponding rates of reinsurance contracts currently in force
- **Morbidity rates:** Rates of hospitalization for contracts associated with health riders are derived from the historical experience.



- **Discount rate:** The Liability for Remaining Coverage is based on the estimate of future cash flows. Future cash flows are discounted using the risk-free curve, published by EIOPA, plus a spread known as illiquidity premium. The illiquidity premium is defined as the parallel shift of the risk-free curve that achieves the matching of liabilities and assets, less by the fundamental spread published by EIOPA
- **General and medical inflation:** The inflation assumptions are derived from macroeconomic indicators, historical trends, and expert assessments regarding the expected future evolution of costs. Medical inflation is monitored separately by the Company and is applied in the estimation of future medical expenses.”

Sensitivity Analysis

The sensitivity analysis of changes in key assumptions, showing the corresponding impact on the fulfilment cash flows (FCF), the contractual service margin (CSM), profit before tax and equity, is presented in the table below (all amounts are presented in € thousand). The analysis is based on a change in an assumption while holding all other assumptions constant:

Underwriting Risk variables	2025			
	(€ thousands)			
	Impact on Fulfillment Cash Flows	Impact on Contractual Service Margin	Impact on profit before tax	Impact on Equity
10% increase in Mortality	2,760	(14,144)	9,509	10,328
10% decrease in Mortality	(2,972)	15,025	(10,550)	(11,455)
10% increase in lapse	59,741	(88,641)	225	25,687
10% decrease in lapse	(73,160)	108,516	110	(31,751)
10% increase in Morbidity & Disability	288,770	(157,250)	(145,478)	(58,313)
100 bps increase of medical & general expense inflation	(72,738)	227,837	(53,552)	(103,548)
10% increase in administrative expenses	12,029	(9,144)	(7,772)	387

Underwriting Risk variables	2024			
	(€ thousands)			
	Impact on Fulfillment Cash Flows	Impact on Contractual Service Margin	Impact on profit before tax	Impact on Equity
10% increase in Mortality	3,596	(13,351)	10,702	9,177
10% decrease in Mortality	(4,019)	14,249	(11,402)	(9,550)
10% increase in lapse	56,449	(69,948)	3,271	11,834
10% decrease in lapse	(67,941)	83,109	(2,899)	(12,971)
10% increase in Morbidity & Disability	349,750	(212,041)	(125,166)	(62,842)
100 bps increase of medical & general expense inflation	(102,448)	161,353	(58,590)	(55,223)
10% increase in administrative expenses	15,378	(13,697)	(4,207)	(1,537)

4.2.2 Non-life Insurance

Non-life insurance contracts provided by the Company cover almost the full range and Lines of Business of Non-life insurance.

The main categories Non-life insurance portfolio concern the motor, fire (commercial and industrial risks) Lines of Business and general third-party liability.

For specific risks arising from an unexpected number of claims or unusually large claims, appropriate proactive practices are applied to all operating levels of the Company:

Underwriting process: The criteria for the acceptance of insurance risk are such that a geographical dispersion of risks and their diversification to different activity sectors are ensured. Furthermore, where necessary, policy limits and claim deductibles are applied in order to reduce the Company's share of the risk. In addition, in many cases insurance contracts include exclusion clauses for risks whose probability of occurrence and financial consequences are difficult to estimate (such as general third-party liability or environmental risks with discernable causing events).

Claims handling: The Company's policy for claims handling is focused on the timely settlement of claims and the prevention of fraudulent cases being accepted by the Company. This is achieved by appropriate information systems, reliable claim assessment procedures and qualified personnel with a high degree of ethical standing.

Provisions for Outstanding Claims: In addition to the claim-by-claim procedure, a number of statistical and actuarial techniques are employed for the estimation of the ultimate cost of claims incurred and the calculation of the corresponding reserves. These techniques are based on historic data for the determination of the final cost and on assumptions regarding the average claims' cost, future inflation, changes in legal framework, as well as on expert judgment. The process entails a significant degree of uncertainty that is being addressed through actuarial and statistical techniques, particularly with regards to the estimation of the incurred claims reserve for bodily injury, loss of life, legal cases and damage of property. The process includes the estimation of reserves for incidences that have not been reported to the Company at the preparation of the financial statements date.

Reinsurance Policy: The selection of the optimal reinsurance coverage varies depending on the nature of the risks involved, the Company's solvency and its capacity to absorb losses arising from extreme events. The structure of the reinsurance program ensures the protection against high frequency of claims, exceptional claims or concentration of claims. The Company places particular emphasis on the coverage of catastrophic events, arising from natural perils, such as earthquakes by selecting reinsurance programs that cover events with a small probability of incurrence.

Claims development tables

The tables below present the development of the incurred claims cost for each accident year from 2019 to 2025, along with a cumulative presentation for accident years up to 2018. In addition, cumulative paid amounts are shown to clearly illustrate the allocation of the total cost between payments already made and the provisions for future payments relating to outstanding claims. The remaining components of the Liabilities for Incurred Claims (LIC) and the Assets for Incurred Claims (AIC) have been added to the tables below for reconciliation purposes.



Gross of reinsurance - Motor insurance

31/12/2025

(€ thousands)

Accident year	before 2019	2019	2020	2021	2022	2023	2024	2025	Total
At end of accident year	-	56,526	44,838	47,814	47,485	45,758	43,616	45,025	
One year later	-	54,260	42,548	41,690	41,787	49,283	47,102	-	
Two years later	-	53,917	38,487	39,181	46,295	49,010	-	-	
Three years later	-	52,189	38,402	41,526	49,711	-	-	-	
Four years later	-	52,099	38,432	42,192	-	-	-	-	
Five years later	-	47,965	34,423	-	-	-	-	-	
Six years later	-	43,530	-	-	-	-	-	-	
Seven years later	669,224	-	-	-	-	-	-	-	
Gross estimates of the undiscounted amount of the claims	669,224	43,530	34,423	42,192	49,711	49,010	47,102	45,025	980,217
At end of accident year	-	15,387	13,977	13,675	16,114	15,401	17,364	18,058	
One year later	-	22,987	20,116	21,712	24,788	23,995	25,907	-	
Two years later	-	24,579	21,938	25,697	28,711	27,395	-	-	
Three years later	-	26,115	23,332	28,213	30,148	-	-	-	
Four years later	-	28,739	24,601	29,091	-	-	-	-	
Five years later	-	30,338	25,828	-	-	-	-	-	
Six years later	-	32,210	-	-	-	-	-	-	
Seven years later	631,306	-	-	-	-	-	-	-	
Cumulative payments to date	631,306	32,210	25,828	29,091	30,148	27,395	25,907	18,058	819,944
Gross undiscounted liabilities for incurred claims	37,919	11,320	8,595	13,100	19,563	21,615	21,195	26,966	160,273
Effect of discounting									(17,567)
Effect of the risk adjustment margin for non-financial risk									6,160
Other components of Liability for Incurred Claims (LIC)									613
Total gross liabilities for incurred claims									149,480

Motor insurance

	Note	Estimate of present value of future cashflows	Risk adjustment	Total
Total gross liabilities for incurred claims	31	535,156	18,754	553,910
Related to				
Motor insurance		142,707	6,160	148,867



Ceded reinsurance - Motor insurance

31/12/2025

(€ thousands)

Accident year	before 2019	2019	2020	2021	2022	2023	2024	2025	Total
At end of accident year	-	-	8	-	-	-	-	-	
One year later	-		367	-	-	-	-	-	
Two years later	-	230	750	-	-	-	-	-	
Three years later	-	236	412	13	21	-	-	-	
Four years later	-	93	-	-	-	-	-	-	
Five years later	-	282	244	-	-	-	-	-	
Six years later	-	264	-	-	-	-	-	-	
Seven years later	2,221	-	-	-	-	-	-	-	
Gross estimates of the undiscounted amount of the claims	2,221	264	244	-	21	-	-	-	2,750
At end of accident year	-	-	-	-	-	-	-	-	
One year later	-	-	-	-	-	-	-	-	
Two years later	-	-	-	-	-	-	-	-	
Three years later	-	-	-	-	-	-	-	-	
Four years later	-	-	-	-	-	-	-	-	
Five years later	-	-	-	-	-	-	-	-	
Six years later	-	-	-	-	-	-	-	-	
Seven years later	657	-	-	-	-	-	-	-	
Cumulative payments to date	657	-	-	-	-	-	-	-	657
Ceded undiscounted liabilities for incurred claims	1,564	264	244	-	21	-	-	-	(398)
Effect of discounting									79
Effect of the risk adjustment margin for non-financial risk									-
Other components of Asset for Incurred Claims (AIC)									2,635
Total ceded liabilities for incurred claims									2,316



Gross of reinsurance - Other non life insurance

31/12/2025

(€ thousands)									
Accident year	before 2019	2019	2020	2021	2022	2023	2024	2025	Total
At end of accident year	-	21,260	19,058	25,171	14,830	79,453	197,833	45,040	
One year later	-	20,514	14,690	18,888	90,843	73,405	167,970	-	
Two years later	-	21,948	15,297	19,505	71,930	71,562	-	-	
Three years later	-	16,832	15,618	19,854	73,722	-	-	-	
Four years later	-	15,474	37,194	19,135	-	-	-	-	
Five years later	-	18,485	36,868	-	-	-	-	-	
Six years later	-	18,303	-	-	-	-	-	-	
Seven years later	225,474	-	-	-	-	-	-	-	
Gross estimates of the undiscounted amount of the claims	225,474	18,303	36,868	19,135	73,722	71,562	167,970	45,040	658,074
At end of accident year	-	4,590	3,181	4,329	3,558	8,129	18,244	-	
One year later	-	9,760	9,533	11,775	8,178	35,268	108,335	-	
Two years later	-	10,924	10,896	13,130	49,372	54,738	-	-	
Three years later	-	11,800	11,043	14,716	64,998	-	-	-	
Four years later	-	12,158	11,872	15,030	-	-	-	-	
Five years later	-	12,436	12,414	-	-	-	-	-	
Six years later	-	14,990	-	-	-	-	-	-	
Seven years later	201,832	-	-	-	-	-	-	-	
Cumulative payments to date	201,832	14,990	12,414	15,030	64,998	54,738	108,335	-	472,337
Gross undiscounted liabilities for incurred claims	23,642	3,313	24,454	4,105	8,723	16,824	59,636	45,040	177,410
Effect of discounting									(18,968)
Effect of the risk adjustment margin for non-financial risk									10,056
Other components of Liability for Incurred Claims (LIC)									868
Total gross liabilities for incurred claims									169,365

Other non life insurance	Note	Estimates of the present value of future cash flows	Risk adjustment	Total
Total gross liabilities for incurred claims	31	535,157	18,754	553,910
Related to				
Other non life insurance		158,442	10,056	168,498



Ceded reinsurance - Other non life insurance

31/12/2025

(€ thousands)

Accident year	before 2019	2019	2020	2021	2022	2023	2024	2025	Total
At end of accident year	-	-	-	-	-	57,364	171,389	22,966	
One year later	-	-	-	-	79,380	32,558	53,698	-	
Two years later	-	-	-	3,153	18,834	12,569	-	-	
Three years later	-	-	1,828	2,010	5,151	-	-	-	
Four years later	-	793	22,681	1,065	-	-	-	-	
Five years later	-	2,813	22,258	-	-	-	-	-	
Six years later	-	337	-	-	-	-	-	-	
Seven years later	12,051	-	-	-	-	-	-	-	
Ceded estimates of the undiscounted amount of the claims	12,051	337	22,258	1,065	5,151	12,569	53,698	22,966	130,095
At end of accident year	-	-	-	-	-	-	-	-	-
One year later	-	-	-	-	-	-	-	-	
Two years later	-	-	-	-	-	-	-	-	
Three years later	-	-	-	-	-	-	-	-	
Four years later	-	-	-	-	-	-	-	-	
Five years later	-	-	-	-	-	-	-	-	
Six years later	-	-	-	-	-	-	-	-	
Seven years later	-	-	-	-	-	-	-	-	
Cumulative payments to date	-	-	-	-	-	-	-	-	-
Gross undiscounted liabilities for incurred claims	12,051	337	22,258	1,065	5,151	12,569	53,698	22,966	130,095
Effect of discounting									(13,352)
Effect of the risk adjustment margin for non-financial risk									7,446
Other components of Asset for Incurred Claims (AIC)									7,126
Total net liabilities for incurred claims									131,315



4.3 Credit Risk

Credit risk concerns the possibility of losses due to the failure of counterparties and debtors, to whom the Company is exposed to, to fulfill the agreed terms. Credit risk is amplified by concentration to single counterparties or group of connected counterparties. Maximum exposure to credit risk is reflected by the amount of each asset. The main counterparties to whom the Company is exposed are reinsurers who may be unable to cover their share of insurance claims already paid to beneficiaries and policyholders for insurance premiums due, the issuers of bonds on which the Company has invested as well as the banks in which it holds deposits. The Company's policy is to enter into transactions with counterparties who fulfil high standards of creditworthiness and to on-going monitor premiums and other due amounts in relation with established time and/or monetary limits.

Exposure to credit risk

The following tables set out the maximum exposure of the Company to credit risk by asset, as recognized in the statement of financial position (without taking into account any guarantees or/and collaterals as they are reported on the statement of financial position).

Financial assets at amortised cost	Note	31/12/2025	31/12/2024
		(€ thousands)	
Debt securities (Bonds)			
- Greek Government	19	42,094	42,249
- Foreign Government	19	820,387	823,807
- Foreign Government	19	78,261	103,797
- Greek Corporate-listed	19	42,635	40,473
- Foreign Corporate-listed	19	10,283	11,079
- Loans to staff and intermediaries	19	10,210	10,207
- Cash and cash equivalents			
- Greek banks	24	27,280	29,846
- Non Greek banks	24	-	-
- Other financial receivables	19	39,183	2,445
Financial assets at FVOCI			
- Debt securities (Bonds)			
- Greek Government	20	39,566	46,893
- Foreign Government	20	876,305	936,985
- Greek Corporate-listed	20	14,224	14,078
- Foreign Corporate-listed	20	287,414	247,446
Financial assets at FVTPL			
- Debt securities (Bonds)			
- Greek Government	21		-
- Foreign Government	21		-
- Greek Corporate-listed	21	18,232	17,608
- Foreign Corporate-listed	21	46,110	83,973
- Mutual funds			
- Greek	21	5,886	54,542
- EU	21	295,250	273,592
- Derivatives	21	-	525
- Private investment funds (private credit)	21	78,704	-
Total credit risk		2,732,024	2,739,545

The Company's maximum exposure to credit risk arising from premium receivables as at the reporting date amounts to €40,915 thousand (2024: €44,086 thousand) and is reflected within the line items 'Other Receivables' and 'Liabilities arising from insurance contracts' in the Statement of Financial Position.



The tables below present an analysis of debt securities as at 31 December 2025 and 31 December 2024 by credit rating and investment category, based on Standard and Poor's (S&P) or an equivalent rating agency in case there is no available rating provided by S&P.

31/12/2025	(€ thousands)										
Credit rating	AAA	AA	A	BBB	BB	B	CCC	CC	C	Non-rated	Total
Fair value through other comprehensive income											
- Debt securities	389,969	205,645	378,183	215,734	16,528	-	-	-	-	11,450	1,217,509
- Equities	-	-	-	-	-	-	-	-	-	3,769	3,769
- Unit-linked contracts	4,459	24,470	3,758	9,233	-	-	-	-	-	-	41,920
Fair value through profit or loss											
- Debt securities	-	3,918	19,923	22,268	-	-	224	-	-	18,008	64,341
- Equities	-	-	-	-	-	-	-	-	-	36,698	36,698
- Mutual funds	-	-	-	-	-	-	-	-	-	301,136	301,136
- Unit-linked contracts	-	-	-	-	-	-	-	-	-	466,171	466,171
- Private equity funds	-	-	-	-	-	-	-	-	-	115,945	115,945
- Derivative financial assets	-	-	-	-	-	-	-	-	-	-	-
Amortised cost											
- Debt securities	295,664	229,258	239,946	147,902	33,317	-	-	-	-	37,290	983,377
- Loans	-	-	-	-	-	-	-	-	-	20,493	20,493
- Other receivables	-	-	-	-	-	-	-	-	-	39,183	39,183
- Cash and Cash Equivalent	-	-	-	20,612	40	-	-	-	-	6,630	27,281
Reinsurance contract assets	-	60,812	85,753	37	-	-	-	-	-	850	147,452
Total credit risk	690,092	524,103	727,563	415,786	49,885	-	224	-	-	1,057,623	3,465,275



31/12/2024	(€ thousands)										
Credit rating	AAA	AA	A	BBB	BB	B	CCC	CC	C	Non-rated	Total
Fair value through other comprehensive income											
- Debt securities	411,441	303,678	284,666	226,073	-	8,405	-	-	-	11,139	1,245,402
- Equities	-	-	-	-	-	-	-	-	-	3,450	3,450
- Unit-linked contracts	21,747	29,725	3,693	9,365	-	-	-	-	-	-	64,530
Fair value through profit or loss											
- Debt securities	-	12,764	29,747	34,435	7,027	-				17,608	101,581
- Equities	-	-	-	-	-	-	-	-	-	30,624	30,624
- Mutual funds	-	-	-	-	-	-	-	-	-	328,134	328,134
- Unit-linked contracts	-	-	-	1,639	-	-	-	-	-	458,959	460,598
- Private equity funds	-	-	-	-	-	-	-	-	-	103,765	103,765
- Derivative financial assets	-	-	-	-	-	-	-	-	-	525	525
Amortised cost											
- Debt securities	270,046	387,859	99,267	133,265	69,212	-	2,095	-	-	48,582	1,010,325
- Loans	-	-	-	-	-	-	-	-	-	21,286	21,286
- Other receivables	-	-	-	-	-	-	-	-	-	2,445	2,445
- Cash and Cash Equivalent	-	-	-	-	24,486	4,274	-	-	-	1,086	29,846
Reinsurance contract assets	-	62,658	221,014	4,677	-	-	-	-	-	797	289,146
Total credit risk	703,234	796,684	638,387	409,454	100,724	12,678	2,095	-	-	1,028,402	3,691,658



4.4 Liquidity risk

Liquidity risk would arise in case the Company is not in the position to meet its obligations when these become due. Liquidity risk concerns the time matching between assets and liabilities, in order the cash equivalent and the cash inflows that arise from the insurance premiums and the liquidation of financial assets to be sufficient to cover the claims of the policyholders and other obligations of the Company.

The Company manages liquidity risk by monitoring its cash position and expected cash inflows and outflows on an ongoing basis. It calculates and monitors the expected cash flows and takes the appropriate measures to maintain sufficient buffers of cash and highly liquid assets.

The table below demonstrates the maturity analysis of undiscounted future cash flows of Liability for Remaining Coverage (LRC).

31/12/2025		(€ thousands)							
		Up to 1 year	1–2 years	2-3 years	3-4 years	4-5 years	5-10 years	>10 years	Total
Life Risk & Savings		63,099	65,400	49,367	61,374	61,071	328,289	(918,434)	(289,834)
Participating		(31,011)	(28,555)	(25,126)	(21,680)	(18,436)	319,023	310,225	504,441
Total		32,088	36,845	24,242	39,694	42,636	647,312	(608,209)	214,608

31/12/2024		(€ thousands)							
		Up to 1 year	1–2 years	2-3 years	3-4 years	4-5 years	5-10 years	>10 years	Total
Life Risk & Savings		51,881	50,241	51,982	39,763	40,315	275,377	(696,434)	(186,874)
Participating		(24,862)	(22,673)	(20,069)	(17,416)	(14,919)	263,426	214,064	377,550
Total		27,019	27,568	31,913	22,347	25,396	538,803	(482,370)	190,676

The amounts from insurance contract liabilities that are payable on demand are set out below:

31/12/2025		31/12/2024		
(€ thousands)				
	Amounts payable on demand	Carrying amount	Amounts payable on demand	Carrying amount
Life Risk & Savings	377,404	1,158,905	523,551	1,157,773
Participating	342,042	364,991	275,445	294,367
Total	719,446	1,523,896	798,995	1,452,140



The following tables provide an analysis of insurance contracts issued and reinsurance contracts held based on current and non-current status.

Insurance contracts issued		(€ thousands)					
		Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Total
Current							
2025		176,589	(70,606)	87,904	53,141	83,790	330,818
2024		398,999	46,292	82,381	47,915	148,454	724,041
		Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Total
Non current							
2025		1,113,428	464,527	9,383	124,234	120,237	1,831,809
2024		868,630	376,642	5,398	123,903	195,759	1,570,332
Reinsurance contracts held		(€ thousands)					
		Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Total
Current							
2025		(223)	-	1,009	1,187	63,844	65,817
2024		(2,764)	-	1,258	123	122,454	121,071
		Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Total
Non current							
2025		(297)	-	(153)	684	79,820	80,054
2024		182	-	134	1,637	162,084	164,037



The following table presents an analysis of the maturity of financial liabilities of the Company.

31/12/2025		(€ thousands)				
	Up to 1 year	1–3 yrs	4-8 yrs	Over 8 yrs	DAF	Total
Investment contracts liabilities	51,948	145,352	355,684	197,779	258,210	1,008,973
Financial and other liabilities	67,367	136,433	639	51,108	-	255,546
Total	119,315	281,785	356,323	248,887	258,210	1,264,519

31/12/2024		(€ thousands)				
	Up to 1 year	1–3 yrs	4-8 yrs	Over 8 yrs	DAF	Total
Investment contracts liabilities	6,644	204,057	278,959	270,889	269,580	1,030,128
Financial and other liabilities	59,895	74	135,704	50,000	-	245,673
Total	66,538	204,131	414,663	320,889	269,580	1,275,801

The table below shows the maturity of the financial assets of the Company. Unit Linked contracts cannot be categorized into short-term and long-term receivables as their liquidation depends on the policyholders who bear the risk.

31/12/2025		(€ thousands)		
	Current assets*	Non-current assets	Unit-Linked	Total assets
Financial assets	104,310	2,638,959	508,091	3,251,360
Other receivables	27,381	44,056	-	71,437
Cash and cash equivalents	27,284	-	-	27,284
Total	158,975	2,683,015	508,091	3,350,081

31/12/2024		(€ thousands)		
	Current assets*	Non-current assets	Unit-Linked	Total assets
Financial assets	77,290	2,767,803	525,128	3,370,222
Other receivables	12,015	5,411	-	17,426
Cash and cash equivalents	29,851	-	-	29,851
Total	119,156	2,773,214	525,128	3,417,499

*Expected recovery or maturity within 12 months from the reporting date of the Financial Statements.



4.5 Market Risk

Market risk concerns the possibility of losses due to changes in the level or volatility of market indicators, such as share prices, interest rates, foreign exchange rates, affecting both assets (investments, reinsurance) and liabilities (insurance and financial liabilities). The Company apply techniques to measure market risk, such as Value-at-Risk measurement, sensitivity analysis and interest rate risk analysis and diversify investments into various instruments to avoid concentration to specific types of investment and counterparties.

4.5.1 Foreign exchange risk

Foreign exchange risk is the risk that the fair value or the future cash flows of a financial asset or liability may change due to fluctuations of the exchange rate.

The Company's exposure to foreign exchange risk is limited since its commercial transactions in other currencies are not extensive. However, it is exposed to foreign exchange risk due to reinsurance contracts including a foreign currency clause, sight deposits and financial assets, as well as the operating activities of subsidiaries, but such exposure is not considered significant at Group level, due to the minor effect of the foreign currency risk in the total assets and liabilities respectively. The receivables of the Company in foreign currency consist of 0.10% of the total assets (2024:0.11%).

To manage foreign currency risk, the Company has limited the permitted currencies in which it can invest directly in its investment portfolio, as well as monitoring and reporting procedures for each exposure.

4.5.2 Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate due to changes in interest rates curves or interest rate volatility.

The Company regularly monitors the effect of interest rate risk. The policy of the Company is to maintain an investment portfolio that matches to the desired extent, the maturity and the yield of financial instruments with the insurance liabilities they cover and monitors this as part of its ALM procedures.

Sensitivity analysis for bonds and debt securities as well as insurance and reinsurance contract liabilities to a vertical change of the yield curve:

Interest Rate sensitivity analysis

2025				
(€ thousands)				
Change in interest rate	Impact on profit before tax	Impact on equity	Impact on CSM	Impact on Fulfillment Cash Flows
Insurance and reinsurance contracts				
+50 bps	328	(20,858)	9,408	9,708
-50 bps	(418)	29,484	(12,017)	(15,261)
Debt instruments				
+50 bps	(30,588)	(60,018)	-	-
-50 bps	30,607	60,068	-	-

Interest Rate sensitivity analysis

2024				
(€ thousands)				
Change in interest rate	Impact on profit before tax	Impact on equity	Impact on CSM	Impact on Fulfillment Cash Flows
Insurance and reinsurance contracts				
+50 bps	8	(16,442)	10,545	5,835
-50 bps	(13)	28,008	(13,572)	(14,356)
Debt instruments				
+50 bps	(32,532)	(62,130)	-	-
-50 bps	34,798	67,812	-	-

The table below presents the sensitivity analysis for the subordinated loan with floating rate issued by the Company, on Profit before tax from a vertical change of the yield curve +/- 25 bps.

2025	2024
(€ thousands)	
+25 bps.-Impact on Profit before tax: increase/(decrease)	(125)
-25 bps.-Impact on Profit before tax: increase/(decrease)	125



4.5.3 Equity risk

Equity risk arises from changes in the value of assets, liabilities and financial instruments due to changes in the level or volatility of market prices of equity, equity indices and derivatives thereon. The Company manages its exposure to equity risk by setting position limits, including concentration ones, through its risk management policy.

Sensitivity analysis of holdings of shares in fluctuations of prices.

2025	Change in equity prices	Impact on profit before tax	Impact on equity
		(€ thousands)	
Equity instruments	5%	1,486	153
	-5%	(1,486)	(153)
2024	Change in equity prices	Impact on profit before tax	Impact on equity
		(€ thousands)	
Equity instruments	5%	1,378	155
	-5%	(1,378)	(155)

4.5.4 Risk of guarantees

Traditional insurance contracts and some Unit-Linked Life Insurance contracts offer a guaranteed return based on a technical interest rate. The negative deviation between the guaranteed benefit/ technical interest rate and the achieved return reflects the risk of guarantees.

The ALCO systematically monitors this risk and takes measures to reduce it.

4.6 Concentration risk

Concentration risk for the Company relates mainly to financial assets (market risk concentration) as well as to insurance premium receivables, reinsurance receivables, loans and other receivables (default risk concentration). The Company manages concentration risk through the individual risk management policies, acknowledging that this risk increases the exposure levels of the various identified risks, like the market risk, the insurance risk, the credit risk, the operational risk, etc. To this end, it sets limits to effectively diversify its investment and insurance portfolio and limit exposure to individual counterparties.

The Company measures concentration risk according to the provisions of the Solvency II framework. There are no solvency capital requirements for the concentration risk at 31.12.2025 in relation to the total capital requirement (2024: 0.0%).

4.7 Operational risk

Operational risk concerns the possibility of loss arising from inadequate or inappropriate internal processes, human resources and operating systems, or from adverse external events. To effectively manage operational risk, the Company has established an operational risk management framework to detect, assess, measure, record and where possible prevent operational risk. The framework includes the detailed documentation of internal processes and controls, the segregation of responsibilities, the continuous training of employees. When the effect of operational risk is or estimated to be significant, beyond the approved risk appetite, action plans are developed to minimize operational risk and their implementation is being monitored.

4.8 Strategic risk

Strategic risk concerns the possibility of losses from changes in the business environment and ineffective response to these changes, poor business decisions, or inadequate implementation of these decisions.

The Company has developed and follows robust strategic planning processes. It constantly assesses developments in its business environment and manages the strategic risk as part of its strategic planning procedures, including risk appetite setting, capital management and ORSA processes, to ensure that it is thoroughly understood and risks to the strategy are identified and assessed properly, controlled and monitored satisfactorily.

Actual performance is regularly monitored against the budget and corrective actions are taken, if necessary. Stress tests and sensitivity analyses are carried out when necessary to examine the effect of changes in business environment parameters to the solvency and to the ability to achieve its business plans.

4.9 Reputation risk

Reputational risk concerns the possibility of losses due to the formation of negative public perception for the Company among clients, counterparties, shareholders, investors or supervisory authorities.

Reputation risk is assessed in the Company's strategy setting, risk appetite setting, capital management and ORSA processes to ensure that it is thoroughly understood and risks are identified promptly, quantified appropriately, monitored continuously and controlled/ mitigated satisfactorily.

A wide and up to date system for managing claims, complaints and requests made from clients and partners is implemented and the reputational impact of all business activities including new product initiatives, new marketing campaigns, and changes in strategy are assessed beforehand.

4.10 Capital management

The Group regularly monitors on a quarterly basis the capital requirement according to the Solvency II regulatory framework by examining the solvency capital requirements (SCR) and the minimum capital requirements (MCR) in relation with the solvency boundaries that are set internally and externally by the European and national regulatory frameworks.

The Group determines the classification of the own funds according to the provisions of the supervisory framework by examining whether they meet the criteria for each Tier of own funds and by applying the appropriate quantitative limits for the eligibility of own funds.

The following table presents the key Solvency 11 figures of the Group and the Company for the financial years 2025 and 2024:

	(€ thousands)	
Basic Solvency II Measures	31/12/2025	31/12/2024
Total eligible own funds for SCR	520,586	559,274
Solvency Capital Requirement (SCR)	294,086	296,853
Solvency Ratio (SCR coverage)	177%	188%



The Company recognizes that it is subject to sustainability risks and at the same time is committed to operate in a socially responsible manner. Sustainability risks may arise from events or circumstances in the environmental (climate change, natural disasters),or social field (human rights, labor practices), or in the Company's governance (corporate governance failures, regulatory violations) which, if materialized, could have an actual or potentially material adverse effect on the value of the assets, liabilities, the reputation and, consequently, the financial robustness of the Company.

The Company recognizes and assesses sustainability and where applicable climate change-related risks monitors the relevant regulatory developments and manages relevant exposures under its wider risk management framework integrating "ESG" aspects.

Note 5: Insurance Revenue and Expense

This note analyses the insurance revenue recognized in relation to insurance contracts issued. Insurance revenue for the years ended 31 December 2025 and 2024, comprised of:

31/12/2025	(€ thousands)					
Insurance revenue	Life Risk & Savings (incl.Health riders)	Direct Participating	Life & Health	Motor	Other non Life	Total
Amounts relating to the changes in the liability for remaining coverage						
Expected insurance service expenses incurred in the period	155,168	(838)	-	-	-	154,329
Change in risk adjustment for non-financial risk	3,324	26	-	-	-	3,350
Amount of CSM recognised in profit or loss	25,216	1,818	-	-	-	27,034
Experience adjustments for premium receipts	-	-	-	-	-	-
Amounts relating to recovery of insurance acquisition cash flows						
Allocation of the portion of premiums that relate to the recovery of insurance acquisition cash flows	8,389	1,724	-	-	-	10,113
Insurance revenue from contracts not measured under PAA	192,098	2,729	-	-	-	194,827
Insurance revenue from contracts measured under PAA	-	-	219,490	74,220	167,926	461,636
Insurance revenue from contracts measured under PAA	192,098	2,729	219,490	74,220	167,926	656,463

For the insurance contracts measured under the premium allocation approach (PAA), insurance revenue for the period is the amount of expected premium receipts allocated to the period.

31/12/2024	(€ thousands)					
Insurance revenue	Life Risk & Savings	Direct Participating	Life & Health	Motor	Other non Life	total
Amounts relating to the changes in the liability for remaining coverage						
Expected insurance service expenses incurred in the period	132,089	2,408	-	-	-	134,497
Change in risk adjustment for non-financial risk	2,720	22	-	-	-	2,742
Amount of CSM recognised in profit or loss	22,076	1,187	-	-	-	23,262
Experience adjustments for premium receipts	-	-	-	-	-	-
Amounts relating to recovery of insurance acquisition cash flows						
Allocation of the portion of premiums that relate to the recovery of insurance acquisition cash flows	7,893	1,149	-	-	-	9,042
Insurance revenue from contracts not measured under PAA	164,778	4,765	-	-	-	169,543
Insurance revenue from contracts measured under PAA	-	-	191,644	66,008	145,320	402,972
Insurance revenue from contracts measured under PAA	164,778	4,765	191,644	66,008	145,320	572,515



This note analyses the insurance service expenses in relation to insurance contracts issued:

31/12/2025		(€ thousands)				
	Life Risk & Savings	Direct Participating	Life & Health	Motor	Other non Life	Total
Incurring claims and other directly attributable expenses	(206,947)	(62)	(142,397)	(48,803)	(25,291)	(423,500)
Amortisation of insurance acquisition cash flows	(8,389)	(1,724)	(55,830)	(16,088)	(29,066)	(111,097)
Changes to liabilities for incurred claims	30,835	-	(10,530)	2,394	11,146	33,845
Losses on onerous contracts and reversals of those losses	(25,378)	2	(1)	-	122	(25,255)
Insurance service expenses	(209,880)	(1,783)	(208,757)	(62,498)	(43,089)	(526,006)

31/12/2024		(€ thousands)				
	Life Risk & Savings	Direct Participating	Life & Health	Motor	Other non Life	Total
Incurring claims and other directly attributable expenses	(162,779)	(1,279)	(149,809)	(52,296)	(213,841)	(580,004)
Amortisation of insurance acquisition cash flows	(7,893)	(1,149)	(49,091)	(13,204)	(22,391)	(93,728)
Changes to liabilities for incurred claims	(11,847)	(916)	14,868	9,806	3,156	15,067
Losses on onerous contracts and reversals of those losses	4,466	(97)	(1)	-	(124)	4,244
Insurance service expenses	(178,053)	(3,441)	(184,033)	(55,694)	(233,199)	(654,421)

Insurance expenses for 2025 recorded a notable decrease, amounting to €526 million compared with €654 million in 2024.

This decrease largely reflects that the exceptional fire-related claims which had characterised the prior year were not present in 2025. It is worth noting that those claims did not impact the Company's net retention, as they pertained to fronting arrangements.



Note 6: Net Financial Result

The table below presents an analysis of total investment income and insurance finance results recognized in the Statement of Total Comprehensive Income:

31/12/2025		(€ thousands)					
Investment income	Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Non-Insurance related	Total
Amounts recognised in profit or loss							
Interest revenue calculated using the effective interest method	18,119	-	9,530	5,009	1,924	19,239	53,821
Other interest and similar income	1,915	-	6,107	1,231	626	1,650	11,530
Net gains/(losses) on financial assets at FVTPL	8,064	23,847	10,412	1,886	505	3,770	48,485
Net gains/(losses) on derecognition of financial assets measured at FVOCI	783	-	(930)	6	11	36	(94)
Impairment loss on financial assets at amortised cost	-	-	-	-	-	848	848
Impairment loss on financial assets at FVOCI	62	-	20	10	4	-	96
Net gains/(losses) on derecognition of financial assets measured at AC	-	-	-	-	-	118	118
Total amounts recognised in the profit or loss	28,943	23,847	25,139	8,142	3,071	25,662	114,803
Amounts recognised in OCI	(55,638)	-	-	-	-	-	(55,638)
Total investment income	(26,695)	23,847	25,139	8,142	3,071	25,662	59,165
Changes in fair value of underlying assets of contracts measured under the VFA	-	(23,835)	-	-	-	-	(23,835)
Interest accreted to insurance contracts using locked-in rate	(7,526)	-	(849)	(1,656)	(5,033)	-	(15,065)
Due to changes in interest rates and other financial assumptions	(45,272)	-	(19)	(1,990)	(3,565)	-	(50,847)
Total insurance finance income / (expenses) from insurance contracts issued	(52,798)	(23,835)	(868)	(3,646)	(8,599)	-	(89,746)
Represented by:							
Amounts recognised in profit or loss	(7,884)	(23,835)	(849)	(1,656)	(5,033)	-	(39,257)
Amounts recognised in OCI	(44,914)	-	(19)	(1,990)	(3,565)	-	(50,489)



(Continued)

31/12/2025

(€ thousands)

Insurance finance income / (expenses) from insurance contracts issued	Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Non-Insurance related	Total
Reinsurance finance income / (expenses) from reinsurance contracts held							
Interest accreted to reinsurance contracts	(20)	-	(34)	(35)	5,899	-	5,809
Due to changes in interest rates and other financial assumptions	(6)	-	4	6	3,312	-	3,316
Total reinsurance finance income / (expenses) from reinsurance contracts held	(27)	-	(30)	(29)	9,211	-	9,125
Represented by:							
Amounts recognised in profit or loss	(20)	-	(34)	(35)	5,899	-	5,809
Amounts recognised in OCI	(6)	-	4	6	3,312	-	3,316
Total insurance finance expenses and reinsurance finance income	(52,825)	(23,835)	(899)	(3,676)	613	-	(80,622)
Represented by:							
Amounts recognised in profit or loss	(7,905)	(23,835)	(883)	(1,691)	865	-	(33,449)
Amounts recognised in OCI	(44,920)	-	(16)	(1,984)	(253)	-	(47,173)



31/12/2024	(€ thousands)						
Investment income	Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Non-Insurance related	Total
Amounts recognised in profit or loss							
Interest revenue calculated using the effective interest method	17,231	-	9,113	3,513	994	18,700	49,551
Other interest and similar income	4,669	-	5,770	478	124	7,352	18,392
Net gains/(losses) on financial assets at FVPL	6,101	26,992	9,198	2,276	513	6,326	51,406
Net gains/(losses) on derecognition of financial assets measured at FVOCI	3,850	-	(2,005)	-	-	167	2,012
Impairment loss on financial assets at amortised cost	-	-	-	-	-	577	577
Impairment loss on financial assets at FVOCI	(267)	-	(232)	(65)	(25)	(15)	(604)
Net gains/(losses) on derecognition of financial assets measured at AC	-	-	-	-	-	35	35
Total amounts recognised in the profit or loss	31,584	26,992	21,843	6,203	1,606	33,142	121,369
Amounts recognised in OCI	(484)	-	-	-	-	-	(484)
Total investment income	31,100	26,992	21,843	6,203	1,606	33,142	120,885
Insurance finance income / (expenses) from insurance contracts issued							
Changes in fair value of underlying assets of contracts measured under the VFA	-	(26,988)	-	-	-	-	(26,988)
Group's share of changes in fair value of underlying items or FCF that do not adjust CSM	-	-	-	-	-	-	-
Interest accreted to insurance contracts using current financial assumptions	-	-	-	-	-	-	-
Interest accreted to insurance contracts using locked-in rate	(6,195)	-	(908)	(1,327)	(3,892)	-	(12,322)
Due to changes in interest rates and other financial assumptions	(12,044)	-	(25)	1,107	6,756	-	(4,206)
Total insurance finance income / (expenses) from insurance contracts issued	(18,239)	(26,988)	(933)	(220)	2,865	-	(43,516)
Represented by:							
Amounts recognised in profit or loss	(7,072)	(26,988)	(908)	(1,327)	(3,891)	-	(40,186)
Amounts recognised in OCI	(11,167)	-	(25)	1,107	6,756	-	(3,329)



(Continued)

31/12/2024

(€ thousands)

Insurance finance income / (expenses) from insurance contracts issued	Life Risk & Savings	Participating	Life & Health	Motor	Other non Life	Non-Insurance related	Total
Reinsurance finance income / (expenses) from reinsurance contracts held							
Interest accreted to reinsurance contracts	(22)	-	(45)	(45)	4,201	-	4,089
Due to changes in interest rates and other financial assumptions	1	-	27	(22)	(5,415)	-	(5,410)
Total reinsurance finance income / (expenses) from reinsurance contracts held	(21)	-	(18)	(67)	(1,214)	-	(1,321)
Represented by:							
Amounts recognised in profit or loss	(22)	-	(45)	(45)	4,201	-	4,089
Amounts recognised in OCI	1	-	27	(22)	(5,415)	-	(5,410)
Total insurance finance income/ (expenses) and reinsurance finance income/ (expenses)	(18,260)	(26,988)	(951)	(287)	1,650	-	(44,836)
Represented by:							
Amounts recognised in profit or loss	(7,094)	(26,988)	(953)	(1,372)	310	-	(36,097)
Amounts recognised in OCI	(11,166)	-	2	1,085	1,341	-	(8,739)



The table below represents the composition and fair values of underlying items for insurance contracts with direct participation features, measured under the VFA. These are insurance contracts that are substantially investment-related service contracts under which an entity promises an investment return based on underlying items.

	31/12/2025	31/12/2024
	(€ thousands)	
	Participating	
Underlying assets		
Cash and cash equivalents	20,986	92,079
Mutual Funds	370,016	299,405
Total investment assets and cash and cash equivalents	391,002	391,483

The reconciliation of cumulative amounts of the fair value reserve within OCI, for financial assets measured at FVOCI, related to the groups of insurance contracts, to which the Company applied the fair value approach at the transition date, is provided in the table below:

	2025	2024
	(€ thousands)	
Cumulative other comprehensive income, opening balance	(29,576)	(29,858)
Transition effect	-	-
Gains or losses recognised in other comprehensive income in the period	(10,755)	2,959
Amounts recognised in profit or loss during the period	(1,035)	(2,597)
Income tax relating to these items	2,594	(80)
Cumulative other comprehensive income, closing balance	(38,771)	(29,576)

Note 7: Net Investment Income

The Company earns an investment return from holdings in financial assets and property investments, held to either back insurance and investment contracts on behalf of policyholders or to deliver returns on Company capital.

This note analyses the Company’s net investment result, which is broken down into the following components:

- (a) interest income recognised in profit or loss as it accrues from investments classified as measured at amortised cost and FVOCI;
- (b) investment appreciation and depreciation (realised and unrealised gains and losses) recognised in profit or loss on investments mandatorily classified or designated as FVTPL;
- (c) Other interest and similar income recognised in profit or loss comprising investment income from equity investments measured at FVTPL, interest on debt securities measured at FVTPL¹ as well as rental income from investment properties;
- (d) Movements recognised in OCI in unrealised appreciation or depreciation of debt securities classified as measured at FVOCI;
- (e) Realised gains and losses on disposal of FVOCI debt securities being “recycled” (reclassified) to profit or loss;
- (f) Impairment gains or losses arising from movements in ECL allowance on financial assets measured at amortised cost and FVOCI, which are recognised in profit or loss; and
- (g) Interest expense on subordinated debt held by the Company that is measured at amortised cost as well as interest expense on investment contract liabilities.

An analysis of net investment income broken down by class of financial instruments and IFRS 9 classification category namely, amortised cost, FVOCI and FVTPL is presented in the below table. The table also shows what amounts were recognised in profit or loss or OCI.

¹ As a matter of accounting policy choice, the Company does not present interest income on financial assets measured at fair value through profit or loss as an additional line item on the face of the profit or loss, but instead it discloses it in this note.



	Financial Assets			Other investments		Financial liabilities		Total
	AC	FVOCI	FVTPL			AC	FVTPL	
Interest revenue from financial assets not measured at FVTPL								
Debt securities	17,556	33,109	-	-	-	-	-	50,664
Investments for unit-linked contracts	-	1,815	-	-	-	-	-	1,815
Cash and cash equivalents	343	-	-	-	-	-	-	343
Loans and other financial receivables	999	-	-	-	-	-	-	999
Total	18,898	34,923	-	-	-	-	-	53,821
Net realised gains/(losses) and change in fair value of FVTPL financial assets								
Debt securities	-	-	257	-	-	-	-	257
Equity securities	-	-	13,056	-	-	-	-	13,056
Mutual funds	-	-	7,811	-	-	-	-	7,811
Investments for unit-linked contracts	-	-	27,178	-	-	-	-	27,178
Private investment funds	-	-	106	-	-	-	-	106
Derivatives	-	-	77	-	-	-	-	77
Total	-	-	48,485	-	-	-	-	48,485
Other interest and similar income								
Dividend income from equity investments	-	135	7,235	-	-	-	-	7,370
Interest revenue from financial assets at FVTPL	-	-	1,747	-	-	-	-	1,747
Rental income from investment properties	-	-	-	1,612	-	-	-	1,612
Disposals of investment properties	-	-	-	801	-	-	-	801
Total	-	135	8,981	2,413	-	-	-	11,530
Net gains/(losses) from the derecognition of financial assets measured at AC	118	-	-	-	-	-	-	118
Net gains/(losses) on investments in debt securities measured at FVTOCI reclassified to profit or loss on disposal	-	(94)	-	-	-	-	-	(94)
Net credit impairment losses								
Debt securities	143	(1)	-	-	-	-	-	142
Investments for unit-linked contracts	-	13	-	-	-	-	-	13
Loans and other financial receivables	-	775	-	-	-	-	-	775
Term deposits	-	14	-	-	-	-	-	14
Total	143	801	-	-	-	-	-	944



(Continued)

31/12/2025

(€ thousands)							
	Financial Assets			Other investments	Financial liabilities		Total
	AC	FVOCI	FVTPL		AC	FVTPL	
Net gains/(losses) on financial assets measured at FVOCI							
Debt securities	-	(53,919)	-	-	-	-	(53,919)
Equity securities	-	995	-	-	-	-	995
Investments for unit-linked contracts	-	(2,808)	-	-	-	-	(2,808)
Net foreign exchange gains/(losses) on financial assets not held at FVTPL	-	94	-	-	-	-	94
Total	-	(55,638)	-	-	-	-	(55,638)
Total interest revenue and investment income (a)	19,159	(19,872)	57,467	2,413	-	-	59,166
Interest expense on subordinated loans	-	-	-	-	(13,466)	-	(13,466)
Interest expense on investment contracts	-	-	-	-	(16,849)	-	(16,849)
Total interest expense on financial liabilities (b)	-	-	-	-	(30,315)	-	(30,315)
Net investment income (a)+(b)	19,159	(19,872)	57,467	2,413	(30,315)	-	28,852
Amounts recognised in profit or loss	19,159	35,766	57,467	2,413	(30,315)	-	84,490
Amounts recognised in OCI	-	(55,638)	-	-	-	-	(55,638)
Total interest revenue and investment income	19,159	(19,872)	57,467	2,413	(30,315)	-	28,852



	Financial Assets			Other investments		Financial liabilities		Total
	AC	FVOCI	FVTPL			AC	FVTPL	
Interest revenue from financial assets not measured at FVTPL								
Debt securities	17,631	27,827	-	-	-	-	-	45,458
Investments for unit-linked contracts	-	2,454	-	-	-	-	-	2,454
Cash and cash equivalents	440	-	-	-	-	-	-	440
Loans and other financial receivables	1,198	-	-	-	-	-	-	1,198
Total	19,269	30,282	-	-	-	-	-	49,551
Net realised gains/(losses) and change in fair value of FVTPL financial assets								
Debt securities	-	-	1,384	-	-	-	-	1,384
Equity securities	-	-	4,557	-	-	-	-	4,557
Mutual funds	-	-	13,860	-	-	-	-	13,860
Investments for unit-linked contracts	-	-	31,005	-	-	-	-	31,005
Private investment funds	-	-	432	-	-	-	-	432
Derivatives	-	-	167	-	-	-	-	167
Total	-	-	51,406	-	-	-	-	51,406
Other interest and similar income								
Dividend income from equity investments	-	99	4,681	-	-	-	-	4,780
Interest revenue from financial assets at FVTPL	-	-	3,489	-	-	-	-	3,489
Rental income from investment properties	-	-	-	3,068	-	-	-	3,068
Disposals of investment properties	-	-	-	7,055	-	-	-	7,055
Total	-	99	8,169	10,123	-	-	-	18,392
Net gains/(losses) from the derecognition of financial assets measured at AC	35	-	-	-	-	-	-	35
Net gains/(losses) on investments in debt securities measured at FVTOCI reclassified to profit or loss on disposal	-	2,012	-	-	-	-	-	2,012
Net credit impairment losses								
Debt securities	180	(592)	-	-	-	-	-	(412)
Investments for unit-linked contracts	-	(11)	-	-	-	-	-	(11)
Loans and other financial receivables	406	-	-	-	-	-	-	406
Term deposits	(10)	-	-	-	-	-	-	(10)
Total	576	(603)	-	-	-	-	-	(27)



(Continued)

31/12/2024

(€ thousands)							
	Financial Assets			Other investments	Financial liabilities		Total
	AC	FVOCI	FVTPL		AC	FVTPL	
Net gains/(losses) on financial assets measured at FVOCI							
Debt securities	-	1,193	-	-	-	-	1,193
Equity securities	-	(151)	-	-	-	-	(151)
Investments for unit-linked contracts	-	486	-	-	-	-	486
Net foreign exchange gains/(losses) on financial assets not held at FVTPL	-	-	-	-	-	-	-
Net gains/(losses) reclassified to profit or loss on disposal	-	(2,012)	-	-	-	-	(2,012)
Total	-	(484)	-	-	-	-	(484)
Total interest revenue and investment income (a)	19,880	31,306	59,575	10,123	-	-	120,884
Interest expense on subordinated loans	-	-	-	-	(14,244)	-	(14,244)
Interest expense on investment contracts	-	-	-	-	(17,585)	-	(17,585)
Total interest expense on financial liabilities (b)	-	-	-	-	(31,829)	-	(31,829)
Net investment income (a)+(b)	19,880	31,306	59,575	10,123	(31,829)	-	89,055
Amounts recognised in profit or loss	19,880	31,790	59,575	10,123	(31,829)	-	89,539
Amounts recognised in OCI	-	(484)	-	-	-	-	(484)
Total interest revenue and investment income	19,880	31,306	59,575	10,123	(31,829)	-	89,055



Note 8: Change In Impairment Of Financial Assets

This note explains the change in loss allowance by stage of the Company's portfolio of financial assets subject to the impairment requirements of IFRS 9. The financial assets recorded in each stage have the following characteristics:

- **Stage 1:** These assets are unimpaired and without significant increase in credit risk on which a 12-month allowance for ECL is recognised
- **Stage 2:** A significant increase in credit risk has been experienced on these assets since initial recognition for which a lifetime ECL is recognised
- **Stage 3:** There is objective evidence of impairment and the assets are therefore considered to be in default or otherwise credit impaired on which a lifetime ECL is recognised.

a) Change in ECL allowance of financial assets measured at amortised cost

The following table provides a reconciliation by stage of the Company's gross carrying amount and allowances for debt instruments, loans and term deposits measured at amortised cost.

Movements are calculated on a quarterly basis and therefore fully capture stage movements between quarters. If movements were calculated on a year-to-date basis, they would only reflect the opening and closing position of the financial instrument.

Changes in 'new financial investments originated or purchased' and 'investments matured or sold' represent the impact from volume movements within the Company's financial investments portfolio

	Stage 1		Stage 2		Stage 3		Total	
Balance as at 1 January 2025	Carrying amount	ECL allowance	Carrying amount	ECL allowance	Carrying amount	ECL allowance	Carrying amount	ECL allowance
Debt securities	1,011,223	(898)	-	-	-	-	1,011,223	(898)
Term deposits	18,185	(16)	-	-	-	-	18,185	(16)
Loans	8,035	(3)	1,515	(4)	1,881	(345)	11,431	(352)
Total (a)	1,037,444	(917)	1,515	(4)	1,881	(345)	1,040,839	(1,266)
Transfer to Stage 1								
Debt securities	-	-	-	-	-	-	-	-
Term deposits	-	-	-	-	-	-	-	-
Loans	(511)	(26)	(15)	-	(247)	-	(772)	(26)
Transfer to Stage 2								
Loans	(1,685)	1	1,535	(6)	(1)	-	(151)	(5)
Transfer to Stage 3								
Loans	(152)	-	(60)	-	215	(5)	3	(5)
Total (b)	(2,347)	(25)	1,460	(6)	(33)	(5)	(921)	(36)
Originated or purchased								
Debt securities	29,483	(20)	-	-	-	-	29,483	(20)
Term deposits	13,910	(2)	-	-	-	-	13,910	(2)
Loans	1,367	-	33	-	-	-	1,400	-
Total (c)	44,761	(22)	33	-	-	-	44,794	(22)
Matured or sold								
Debt securities	(56,455)	15	-	-	-	-	(56,455)	15
Term deposits	(18,185)	16	-	-	-	-	(18,185)	16
Loans	(1,003)	-	(20)	-	(342)	126	(1,365)	126
Total (d)	(75,643)	31	(20)	-	(342)	126	(76,006)	157
Remeasurements								
Debt securities	(127)	156	-	-	-	-	(127)	156
Term deposits	-	-	-	-	-	-	-	-
Loans	-	-	-	-	-	-	-	-
Total (e)	(127)	156	-	-	-	-	(127)	156
Total impairment charge for the period (f=b+c+d+e)	-	140	-	(6)	-	121	-	255
Balance as at 31 December 2025	1,004,087	(7776)	2,988	(10)	1,505	(224)	1,008,580	(1,011)



As shown in the above table, the allowance for ECL for financial investments measured at amortized cost decreased by €255 thousands during the period from €1,266 thousands at 31 December 2024 to €1,011 as at 31 December 2025.

This decrease was driven by:

- Changes in volumes due to maturities and early repayments amounting to €157 thousand;
- Credit risk movements (improvement) and the impact from transfers across the three stages, totalling €98 thousand.

	Stage 1		Stage 2		Stage 3		Total	
Balance as at 1 January 2025	Carrying amount	ECL allowance	Carrying amount	ECL allowance	Carrying amount	ECL allowance	Carrying amount	ECL allowance
Debt securities	1,236,004	(1,196)	9,603	(13)	-	-	1,245,607	(1,209)
Investments for unit-linked contracts	64,530	(38)	-	-	-	-	64,530	(38)
Total (a)	1,300,534	(1,235)	9,603	(13)	-	-	1,310,137	(1,247)
Originated or purchased								
Debt securities	124,908	(120)	-	-	-	-	124,908	(120)
Investments for unit-linked contracts	-	-	-	-	-	-	-	-
Total (b)	124,908	(120)	-	-	-	-	124,908	(120)
Matured or sold								
Debt securities	(102,604)	50	-	-	-	-	(102,604)	50
Investments for unit-linked contracts	(19,700)	6	-	-	-	-	(19,700)	6
Total (c)	(122,304)	56	-	-	-	-	(122,304)	56
Remeasurements								
Debt securities	(50,180)	154	(18)	(8)	-	-	(50,198)	146
Investments for unit-linked contracts	(2,910)	7	-	-	-	-	(2,910)	7
Total (d)	(53,090)	161	(18)	(8)	-	-	(53,108)	153
Total impairment charge for the period (e=b+c+d)	-	97	-	(8)	-	-	-	89
Balance as at 31 December 2025	1,250,049	(1,138)	9,585	(21)	-	-	1,259,633	(1,158)

As shown in the table above, the impairment allowance for investments in financial assets measured at fair value through other comprehensive income recorded an overall decrease of €89 thousand during the year, from €1,247 thousand as at 31 December 2024 to €1,158 thousand as at 31 December 2025. The decrease was driven by:

- Changes in volumes due to maturities and early repayments amounting to €56 thousand.
- Credit risk movements (improvement) and the impact from transfers across the three stages, amounting to €153 thousand.

b) Change in ECL allowance of financial investments measured at FVOCI

The following table provides a reconciliation by stage of the Company's gross carrying amount and allowances for debt instruments and unit-linked assets measured at FVOCI.

Movements are calculated on a quarterly basis and therefore fully capture stage movements between quarters. If movements were calculated on a year-to-date basis, they would only reflect the opening and closing position of the financial instrument.

Changes in 'new financial investments originated or purchased' and 'investments matured or sold' represent the impact from volume movements within the Company's financial investments portfolio.

The above movements were partially offset by:

- Changes in volumes, including movements arising from new placements, amounting to €120 thousand; and



Note 9: Other Expenses

The below table analyses the operating expenses for the years ended 2025 and 2024:

	31/12/2025				31/12/2024			
	(€ thousands)							
	Expenses attributed to insurance acquisition cash flows	Other directly attributable expenses	Other operating expenses	Total	Expenses attributed to insurance acquisition cash flows	Other directly attributable expenses	Other operating expenses	Total
Personnel costs	(8,707)	(29,604)	(13,828)	(52,139)	(8,561)	(29,360)	(26,197)	(64,119)
Third party fees	(3,687)	(5,389)	(12,281)	(21,357)	(2,353)	(5,252)	(16,999)	(24,604)
Telecommunications-Postage	(1,775)	(2,078)	(1,687)	(5,540)	(1,037)	(1,853)	(388)	(3,278)
Rentals	(44)	(87)	(33)	(163)	(39)	(94)	(40)	(172)
Insurance premiums	(149)	(297)	(161)	(607)	(198)	(457)	(255)	(911)
Repairs and maintenance	(701)	(1,623)	(740)	(3,064)	(597)	(1,016)	(588)	(2,201)
Taxes / duties	(186)	(576)	(438)	(1,200)	(49)	(1,437)	(547)	(2,034)
Transport and travel expenses	(79)	(240)	(684)	(1,003)	(104)	(269)	(992)	(1,365)
Advertising and promotion	(4,186)	(736)	(1,418)	(6,340)	(21)	(1,770)	(2,852)	(4,643)
Stationery	(102)	(217)	(67)	(385)	(112)	(254)	(78)	(445)
Depreciation & impairment of assets	(1,601)	(4,446)	(3,800)	(9,847)	(1,509)	(4,582)	(3,528)	(9,618)
Provision for litigation	8	1	(495)	(486)	-	(1,411)	(481)	(1,893)
Other	(2,403)	(4,517)	(2,640)	(9,560)	(1,282)	(4,543)	(4,408)	(10,232)
Total	(23,612)	(49,809)	(38,271)	(111,691)	(15,863)	(52,298)	(57,353)	(125,514)

Personnel costs are analyzed as follows:

	31/12/2025	31/12/2024
	(€ thousands)	
Wages and salaries	(36,818)	(39,324)
Obligatory social security contributions	(9,147)	(8,854)
Defined benefit plan	(2,947)	(12,793)
Premiums of Company's employees DAF contracts	(3,227)	(3,148)
Total personnel costs	(52,140)	(64,119)

Line item "Premiums of Company's employees DAF contracts" includes contributions of the Company for 2025 of €1,2m {€1,2m for 2024), relating to the group policy of the personnel's defined contribution.

During 2025, the Company had an average of 665 employees (2024: 673 employees for the Company).

The decrease in line item "Personnel costs" is primarily due to the cost of the Voluntary Exit Scheme implemented in 2024, given that no similar scheme was carried out in 2025, as well as the capitalisation of payroll expenditure related to specific project teams within the Technology and Strategic Transformation Divisions, which meet the recognition criteria for capitalisation as capital expenditure in accordance with the relevant requirements of IAS 38 *Intangible Assets*.

The decrease in line item "Third party fees" is attributed to better negotiations and reduced consulting expenses incurred in 2025.

The increase in line 'Telecommunications–Postage" expense is mainly related to the temporary enhancement of the Company's information system within the context of the ongoing transformation.

"Advertising and promotion" expenses increased due the strengthened market presence and the enhanced promotional initiatives implemented during the reporting period.

The line item "Provision for litigation" includes provisions for legal claims against the Company. The decrease is mainly due to release in 2025 of provisions recorded in prior years.



Note 10: Other Income

	31/12/2025	31/12/2024
	(€ thousands)	
Gains/(Losses) on foreign exchange differences	(381)	(393)
Unit-Linked fees	35	1,782
Other fees from third parties	-	5
Gains/(Losses) on disposal of fixed assets	(13)	(5)
Gains/ (Losses) from the disposal of subsidiaries	26,327	-
Other	4,532	2,128
Total other income	30,500	3,516

On 11 April 2025, the Company announced that it had entered into a binding agreement with Bank of Cyprus Holdings Public Limited Company (“Bank of Cyprus”) for the transfer of 100% of the shares of its subsidiary, Ethniki Insurance (Cyprus) Limited (the “Transaction”).

The total consideration for the Transaction amounted to €32.1 million. The completion of the Transaction, which was subject to obtaining approvals from the competent supervisory authorities, took place in July 2025. The transaction was initially executed between the Company and its parent entity, Ethniki Holdings S.à r.l., at the agreed consideration. The parent entity subsequently completed the disposal to Bank of Cyprus. The resulting gain of €26.3 million is presented under the line item “Gains from disposal of subsidiaries” in the table above.

Note 11: Income Tax Expense

	31/12/2025	31/12/2024
	(€ thousands)	
Current tax - current year	-	-
Current tax - previous years	2,554	(598)
Deferred tax	(3,088)	(3,345)
Total income tax	(534)	(3,943)

	31/12/2025	31/12/2024
	(€ thousands)	
Profit before tax	48,014	14,812
Tax calculated based on the current tax rate	(10,563)	(3,259)
Effect of tax rate change in Greece	-	-
Effect of different tax rates in other countries	-	-
Income/expenses not subject to taxation	7,649	4,542
Non tax - deductible expenses	(169)	(4,505)
Dividend distribution of prior year income	-	-
Previous years' income tax	2,549	(721)
Other differences	-	-
Tax calculated based on the effective tax rate	(534)	(3,943)
Tax calculated based on the effective tax rate	22%	22%
Effective tax rate	1%	27%

The unaudited tax years per Group Company are set out in the table below:

Company	COUNTRY OF OPERATIONS	UNAUDITED TAX YEARS
ETHNIKI HELLENIC GENERAL INSURANCE S.A.	GREECE	2019 - 2025
ELYZE ANONYMI ETAIREIA ASFALISTIKON PRAKTORON KAI SYNTONISTON ASFALISTIKON PRAKTORON S.A	GREECE	2010-2025
ELYZE MESITES S.A.	GREECE	2019-2025



Note 12: Property And Equipment

(€ thousands)							
	Land	Buildings	Right of use assets	Vehicles & equipment	Leasehold improvements	Assets under construction	Total
Cost							
Balance at 1/1/2024	52,386	94,922	4,275	29,929	927	1,712	184,151
Additions	-	973	1,264	1,474	24	438	4,173
Transfers	-	51	-	-	-	(1,703)	(1,652)
Disposals & write offs	-	-	(335)	(893)	(44)	(66)	(1,338)
Balance at 31/12/2024	52,386	95,946	5,204	30,510	907	381	185,334
Accumulated depreciation and impairment							
Balance at 1/1/2024	(10)	(48,597)	(2,987)	(26,778)	(923)	-	(79,295)
Disposals & write offs	-	-	174	709	44	-	927
Transfers' Depreciation charge	-	(2,575)	(788)	(1,251)	(12)	-	(4,626)
Depreciation charge	-	-	-	-	-	-	-
Balance at 31/12/2024	(10)	(51,172)	(3,601)	(27,320)	(891)	-	(82,994)
Net book value at 31/12/2024	52,376	44,774	1,603	3,190	16	381	102,340
Cost							
Balance at 1/1/2025	52,386	95,946	5,204	30,510	907	381	185,334
Additions	-	120	1,013	1,247	24	3,854	6,258
Transfers	(5,261)	(13,618)	-	-	-	(544)	(19,423)
Disposals & write offs	-	-	(21)	(227)	-	-	(248)
Balance at 31/12/2025	47,125	82,448	6,196	31,530	931	3,691	171,921
Accumulated depreciation and impairment							
Balance at 1/1/2025	(10)	(51,172)	(3,601)	(27,320)	(891)	-	(82,994)
Disposals & write offs	-	-	19	94	-	-	113
Depreciation charge	-	(2,510)	(765)	(1,245)	(11)	-	(4,531)
Transfers' Depreciation charge	9	11,280	-	-	-	-	11,289
Balance at 31/12/2025	(1)	(42,402)	(4,347)	(28,471)	(902)	-	(76,123)
Net book value at 31/12/2025	47,124	40,046	1,849	3,059	29	3,691	95,798

Depreciation and impairment charges are recognised under "Other expenses" in the statement of total comprehensive income.

The Company’s Management engaged certified independent valuers to assess the fair value of its owner-occupied properties. As at 31 December 2025, their fair value was determined at €108,639 thousand.



Note 13: Assets Held for Sale

	31/12/2025	31/12/2024
	(€ thousands)	
Property		
Plot of Elliniko - 35th str.	6,120	6,120
Kouklia VILAGE HA POTAMI No 19 Pafou, Cyprus	-	423
Fragkolagada - Argolida (field)	5	5
Stifogianni - Almiros Magnisia (field)	5	5
6 Ethn. Antistaseos str. - Arta (7 Vlachoutsh str.)	150	150
144 Vas. Olgas str. - Thessaloniki (residence)	260	260
62 Athinas str - Athens	-	4,225
19 Leonidou str. - Athens (plot)	170	170
36 Kolokinthous & Iasonos str. (plot)	430	430
2 Voulkoudi str. & 26 Giota Gonou str. - Giannitsa	71	71
121 Ethn. Antistaseos str. - Thessaloniki	651	651
1 Evpolidos - Apellou Str. Likourgou, Athens	1,400	-
8th Karagiorgi Servias Str., Athens	7,944	-
58 Athinas str - Athens	3,607	-
1 Skouleniou str - Athens	1,363	-
135 Siggrou Ave. & Kratitos Str.- Athens	5,838	-
Subtotal	28,014	12,510
Investment in subsidiaries		
SOCIETATE COMERCIALA GARANTA ASIGURARI S.A.	-	500
ETHNIKI INSURANCE (CYPRUS) LTD	-	5,704
Subtotal	-	6,204
Total assets held for sale	28,014	18,714

The fair value of the assets held for sale as at 31 December 2025 amounted to €52,688 thousand. The valuation was primarily based on the proposed selling price, while for certain properties updated appraisals were taken into account, as available at the reporting date. For the property located in the Municipality of Elliniko, fair value was determined with reference to the Preliminary Real Estate Transfer Agreement No. 31.365/20.06.2017.

Among the aforementioned assets, a preliminary transfer agreement for the property “Elliniko Plot – 35th Street” was signed on 20 June 2017 with Ktiriakes Ypodomes S.A. The agreement provided for the gradual settlement of the Company’s related receivable (€6,120 thousand plus accrued interest) through instalment payments. This receivable was fully settled during the fiscal year of 2019.

Note 14: Investment Property

	(€ thousands)			
	Land	Buildings	Assets under construction	Total
Cost				
Balance at 1/1/2024	12,212	44,286	-	56,498
Transfers	-	-	-	-
Disposals	-	-	-	-
Additions	-	-	-	-
Balance at 31/12/2024	12,212	44,286	-	56,498
Accumulated depreciation and impairment				
Balance at 1/1/2024	(222)	(31,570)	-	(31,792)
Depreciation charge	-	(1,200)	-	(1,200)
Transfers	-	-	-	-
Disposals	-	-	-	-
Impairment charge	-	-	-	-
Balance at 31/12/2024	(222)	(32,770)	-	(32,992)
Net book value at 31/12/2024	11,990	11,516	-	23,506
Cost				
Balance at 1/1/2025	12,212	44,286	-	56,498
Transfers	(9,721)	(27,848)	-	(37,569)
Balance at 31/12/2025	2,491	16,438	-	18,929
Accumulated depreciation and impairment				
Balance at 1/1/2025	(222)	(32,770)	-	(32,992)
Depreciation charge	-	(944)	-	(944)
Transfers	3	25,549	-	25,552
Balance at 31/12/2025	(219)	(8,165)	-	(8,384)
Net book value at 31/12/2025	2,272	8,273	-	10,545

Depreciation and impairment charges are recognised within the line "Other expenses" in the statement of total comprehensive income.

Rental income for the Company for the year ended 31 December 2025 amounted to €1,612 thousand. In the year 2024, rental income for the Company amounted to €3,068 thousand (see Note 7).

The fair value of investment property as at 31 December 2025 amounted to €14,809 thousand, as determined based on available market data and relevant valuations performed by independent professional valuers.



Note 15: Intangible Assets

	(€ thousands)	
	Software	Total
Cost		
Balance at 1/1/2024	64,687	64,687
Additions	7,733	7,733
Transfers	-	-
Balance at 31/12/2024	72,420	72,420
Accumulated amortization and impairment		
Balance at 1/1/2024	(50,216)	(50,216)
Amortization charge	(3,793)	(3,793)
Transfers	-	-
Balance at 31/12/2024	(54,009)	(54,009)
Net book value at 31/12/2024	18,411	18,411
Cost		
Balance at 1/1/2025	72,420	72,420
Additions	8,569	8,569
Disposals & write offs	(521)	(521)
Balance at 31/12/2025	80,468	80,468
Accumulated amortization and impairment		
Balance at 1/1/2025	(54,009)	(54,009)
Amortization charge	(4,371)	(4,371)
Disposals & write offs	33	33
Balance at 31/12/2024	(58,347)	(58,347)
Net book value at 31/12/2024	22,121	22,121

Amortisation charges for the period are recognised under "Other expenses" in the statement of total comprehensive income.

The software additions concern expenses incurred for the improvement and upgrading of the Company’s information systems functionality.

Note 16: Investment In Subsidiaries

	31/12/2025			31/12/2024	
	(€ thousands)				
Participation	Country	% of ownership	Carrying value	% of ownership	Carrying value
Company					
ELYZE ANONYMI ETAIREIA ASFALISTIKON PRAKTORON KAI SYNTONISTON ASFALISTIKON PRAKTORON S.A.	Greece	55.00%	1,607	-	-
ELYZE MESITES S.A	Greece	55.00%	460	-	-
Total investments in subsidiaries			2,067		-

New subsidiaries

In September 2025, Ethniki Asfalistiki entered into an agreement with the Syngelidis Group for the acquisition of a majority stake (55%) in the insurance broker companies Elysee Insurance Agent & Coordinator S.A. and Elysee Insurance Brokers S.A., which operate across all insurance lines in Greece.

The transaction aims to expand the Company’s product distribution channels, create new growth opportunities, and diversify its sources of revenue, while delivering even greater value to its customers.

The consideration for the transaction includes an upfront cash payment of €1,100 thousand, as well as a contingent consideration with a maximum amount of €1,100 thousand, which will be payable based on the achievement of predefined performance targets by the acquired companies during the three-year period following the acquisition. As a result, the total consideration could amount up to €2,200 thousand by the end of the three-year period.

The contingent consideration, as assessed on 31.12.2025, was determined to meet the IFRS 9 classification criteria for a financial liability. Its valuation was carried out by discounting the estimated future cash flows, resulting in a fair value of €967 thousand. Accordingly, the fair value of the total consideration at initial recognition amounted to €2,067 million.

Sale of subsidiaries

a) Ethniki Insurance (Cyprus) Ltd.

The Company announced on 11.04.2025 that it entered into a binding agreement with the Bank of Cyprus Holdings Public Limited Company (“Bank of Cyprus”) for the transfer of the entire (100%) shareholding of its subsidiary, National Insurance (Cyprus) Limited (the “Transaction”).

Subsequently, on 22 July 2025, as part of an internal reorganisation, it was agreed between the Company and Bank of Cyprus that the 100% shareholding in Ethniki Insurance (Cyprus) Limited would be transferred to the Company’s parent entity, ETHNIKI HOLDINGS S.À R.L.

The total consideration for the Transaction amounted to €32,053 thousand, while its completion, which was subject to the required approvals by the competent supervisory authorities, took place in July 2025.

b) Garanta Asigurari S.A. (Romania)

On 1 November 2024, a new strategic agreement was signed by Ethniki Asfalistiki for the sale of the 96.74% stake it holds in Garanta Asigurari S.A. in Romania to Signal Iduna Asigurare Reasigurare S.A., a subsidiary of the Signal Iduna Group.

The transaction that was subject to approval by the relevant regulatory authorities, was completed in September 2025.



Note 17: Deferred Tax Assets / Liabilities

	(€ thousands)							
	Balance at 31/12/2023	IFRS9 transition	Recognized in profit or loss	Recognized in equity	Balance at 31/12/2024	Recognized in profit or loss	Recognized in equity	Balance at 31/12/2025
Intangible assets	25	-	18	-	43	(5)	-	38
Carried forward tax losses	26,830	-	9,993	-	36,823	5,100	-	41,923
Post retirement benefits	(1,041)	-	272	894	125	(142)	(562)	(580)
Provision for non-performing receivables	1,943	-	378	-	2,321	(54)	-	2,267
Investment property	(4,358)	-	2,201	-	(2,157)	333	-	(1,824)
Property & equipment	(4,449)	-	337	-	(4,112)	421	-	(3,691)
Financial assets	30,531	-	(6,941)	106	23,696	(3,087)	12,239	32,847
PSI loss (Law 4046/12)	48,955	-	(2,720)	-	46,235	(2,720)	-	43,515
Other provisions	3,422	-	(1,381)	-	2,041	439	-	2,480
Insurance liabilities	82,913	-	(5,502)	1,922	79,333	(3,372)	10,378	86,339
Deferred tax assets	184,771	-	(3,345)	2,922	184,348	(3,088)	22,055	203,314

Based on the Company’s accounting policies and projected future taxable profits, the deferred tax assets arising from deductible temporary differences are assessed as fully recoverable.

Deferred tax relating to insurance liabilities reflects the difference between the tax and accounting bases following the adoption of IFRS 17. The deferred tax asset on carried-forward tax losses totals €41,923 thousand and is allocated as follows: €9,012 thousand for 2022, €17,690 thousand for 2023, €10,116 thousand for 2024 and €5,105 thousand for 2025. These amounts are expected to be utilised by 2026, 2027, 2028 and 2029, respectively.

The assumptions underpinning Management's assessment of the recoverability of the deferred tax asset are presented in Note 3.5.

The debit difference arising under Law 4046/2012 in connection with the exchange of Greek Government Bonds is treated as a tax-deductible expense and is amortised over 30 equal annual instalments. As at 31 December 2025, the unamortised balance stood at €197,799 thousand and is expected to be fully amortised by 2041.

The Company has offset its deferred tax assets and liabilities, as the applicable tax framework permits the netting of income tax positions at the legal-entity level, provided that the deferred tax balances arise from the same tax authority.



Note 18: Breakdown of Financial Assets and Liabilities

The following table provides an analysis of the Company’s financial assets and financial liabilities by type and classification category in accordance with IFRS 9, namely investments measured at amortized cost (AC), fair value through other comprehensive income (FVOCI) and fair value through profit or loss (FVTPL), showing separately the carrying value of those (i) mandatorily classified and (ii) those designated at initial recognition.

31/12/2025

(€ thousands)

	AC	FVOCI		FVTPL		Total
		Designated	Mandatory	Designated	Mandatory	
Financial assets						
Debt securities	983,377	-	1,217,510	64,117	224	2,265,228
Equity securities	-	3,769	-	-	36,698	40,467
Mutual funds	-	-	-	-	301,136	301,136
Private investment funds	-	-	-	-	115,945	115,945
Unit-linked	-	41,920	-	-	466,171	508,091
Loans & Direct Private Credit	20,493	-	-	-	-	20,493
Derivative financial assets	-	-	-	-	-	-
Total financial assets	1,003,870	45,689	1,217,510	64,117	920,174	3,251,360
Other financial receivables	39,183	-	-	-	-	39,183
Cash and cash equivalents	27,284	-	-	-	-	27,284
Financial Liabilities						
Investment contract liabilities	988,383	-	-	-	20,589	1,008,973
Subordinated debt	177,127	-	-	-	-	177,127
Total financial liabilities	1,165,510	-	-	-	20,589	1,186,100

31/12/2024

(€ thousands)

	AC	FVOCI		FVTPL		Total
		Designated	Mandatory	Designated	Mandatory	
Financial assets						
Debt securities	1,010,326	-	1,245,402	-	101,581	2,357,309
Equity securities	-	3,450	-	-	30,624	34,074
Mutual funds	-	-	-	-	328,134	328,134
Private investment funds	-	-	-	-	103,765	103,765
Unit-linked	-	64,530	-	460,598	-	525,128
Loans & Direct Private Credit	21,286	-	-	-	-	21,286
Derivative financial assets	-	-	-	-	525	525
Total financial assets	1,031,612	67,980	1,245,402	460,598	564,629	3,370,222
Other financial receivables	2,445	-	-	-	-	2,445
Cash and cash equivalents	29,851	-	-	-	-	29,851
Financial Liabilities						
Investment contract liabilities	1,006,595	-	-	-	23,533	1,030,128
Subordinated debt	177,128	-	-	-	-	177,128
Total financial liabilities	1,183,723	-	-	-	23,533	1,207,256

Comparative information has been restated to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits. Further information is provided in Note 38.



Note 19: Financial Assets at Amortised Cost by Product Line

The table below presents the composition of the Company’s financial assets classified as measured at amortised cost with the debt instruments portfolio being further broken into by type of issuer and listing status and loans being presented by type of borrower.

	31/12/2025	31/12/2024
	(€ thousands)	
	Carrying amount	
1. Debt securities		
A. Government bonds		
- Greek Government	42,094	42,249
- Foreign Government	820,387	823,807
B. Corporate bonds		
- Listed	120,896	144,270
- Unlisted	-	-
Total debt securities	983,377	1,010,325
2. Direct Private Credit	10,210	10,207
3. Loans		
A. To staff		
- Mortgage	7,449	8,190
- Other	2,390	2,444
B. To intermediaries	444	445
Total loans	10,283	11,079
4. Other financial receivables		
- Other	39,183	2,445
Total other financial receivables	39,183	2,445
5. Cash and cash equivalents	27,284	29,851
Total	1,070,337	1,063,907

Direct private credit of €10,210 thousand in the above table is a collateralised bond loan advanced to Dimand SA, a Company operating in the real estate sector, as part of the Company’s strategic asset allocation program. The loan has a term of 3 years maturing in 2026, with a fixed annual interest rate at 8%.

The fair value of debt securities carried at amortised cost was €883,484 thousand (2024: € 911,577 thousand) as analysed in the table below. During 2025, the transfers between levels within the portfolios included transfers from Level 2 to Level 1 of €25,134 thousand.

The fair value of loans, other financial receivables, and cash and cash equivalents approximates their carrying amount as at the reporting date.

	31/12/2025				31/12/2024			
	(€ thousands)							
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets at AC								
Government bonds	632,652	135,359	-	768,011	637,004	137,404	-	774,408
Other debt securities	57,036	58,437	-	115,473	56,789	80,380	-	137,169
Total	689,688	193,796	-	883,484	693,793	217,784	-	911,577

Comparative information has been restated to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits. Further information is provided in Note 38.



Note 20: Financial Assets at FVOCI by Product Line

The table below presents the composition of the Company’s financial assets classified as measured at fair value through other comprehensive income. The Company's debt instruments portfolio is further broken into by type of issuer and listing status, the portfolio of equity instruments held is presented by listing status, with unit-linked assets being presented by type of investment exposure.

	31/12/2025	31/12/2024
	(€ thousands)	
	Carrying amount	
1. Debt securities		
A. Government bonds		
- Greek Government	39,566	46,893
- Foreign Government	876,305	936,985
B. Corporate bonds		
- Listed	301,638	261,524
- Unlisted	-	-
Total debt securities	1,217,509	1,245,402
2. Equity securities		
- Listed	3,769	3,450
- Unlisted	-	-
Total	3,769	3,450
3. Investments for unit-linked contracts		
A. Government bonds		
- Greek Government	9,233	9,365
- Foreign Government	28,929	51,472
B. Corporate bonds		
- Listed	3,758	3,693
- Unlisted	-	-
Total investments for unit-linked contracts	41,920	64,530
Total	1,263,198	1,313,382

Comparative figures have been restated to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits. For further details, refer to Note 38.

FVOCI securities are categorised according to IFRS 13 in the following fair value hierarchy levels:

	31/12/2025				31/12/2024			
	(€ thousands)							
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets at FVOCI								
Government bonds	833,037	82,834	-	915,871	816,872	154,925	-	971,797
Other debt securities	130,505	171,133	-	301,638	77,954	179,798	-	257,752
Equity securities	3,769	-	-	3,769	3,450	-	-	3,450
Unit-linked	29,869	12,051	-	41,920	39,165	25,365	-	64,530
Total	997,180	266,018	-	1,263,198	937,441	360,087	-	1,297,529

During 2025, portfolio movements within the valuation hierarchy included transfers from Level 1 to Level 2 amounting to €0.978 thousand, and from Level 2 to Level 1 amounting to €116,823 thousand.



Note 21: Financial Assets at FVTPL by Product Line

The table below presents the composition of the Company's financial assets classified as measured at fair value through profit or loss. The Company's portfolio of debt instruments is further analysed by type of issuer and listing status, equity instruments are presented by listing status, mutual fund holdings are split between domestic and EU-domiciled funds, and unit-linked investments are further broken down by type of investment exposure.

	31/12/2025	31/12/2024
	(€ thousands)	
	Carrying amount	
1. Debt securities		
A. Government bonds		
- Greek Government	-	-
- Foreign Government	-	-
B. Corporate bonds		
- Listed	64,341	101,581
- Unlisted	-	0
Total debt securities	64,341	101,581
2. Equity securities		
- Listed	36,698	30,624
- Unlisted	-	0
Total equity securities	36,698	30,624
3. Mutual funds		
- Greek	5,886	54,542
- Other EU	295,250	273,592
Total mutual funds	301,136	328,134
4. Investments for unit-linked contracts		
- Mutual funds	443,774	366,858
- Debt securities (bonds)	-	0
- Equities	-	0
- Deposits	22,397	93,718
- Derivative financial assets	-	22
Total Investments for unit-linked contracts	466,171	460,598
5. Private investment funds	115,945	103,765
6. Derivative financial assets	-	525
Total	984,291	1,025,227

Comparative figures have been restated to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits. For further details, refer to Note 38.



FVTPL securities are categorized according to IFRS 13 in the following fair value hierarchy levels:

	31/12/2025				31/12/2024			
	(€ thousands)							
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets at FVTPL								
Government bonds	-	-	-	-	-	-	-	-
Other debt securities	28,302	36,039	-	64,341	59,125	41,452	-	100,577
Mutual Funds	301,136	-	-	301,136	328,136	-	-	328,136
Private investment funds	-	-	115,945	115,945	-	-	103,765	103,765
Equity securities	36,698	-	-	36,698	30,624	-	-	30,624
Derivatives	-	-	-	-	-	525	-	525
Unit-linked	445,185	20,986	-	466,171	368,497	92,101	-	460,598
Total	811,321	57,025	115,945	984,291	786,382	134,078	103,765	1,024,225

During 2025, the transfers between levels within the portfolios included transfers from Level 2 to Level 1 of €6,016 thousands.

In accordance with the disclosure requirements of IAS 13, the movement in the fair value of the Company’s investments in private equity funds is presented below.

	31/12/2025	31/12/2024
	(€ thousands)	
Balance at beginning of the period	103,765	63,062
Profit/ (loss) for the period	106	432
- Unrealised	611	1,333
- Realised	(505)	(902)
Purchases	23,404	57,106
Settlements	(11,330)	(16,834)
Balance at end of the period	115,945	103,765

The Company measures its investments in private equity funds at fair value, based on the most recent financial statements of each fund, which are prepared in accordance with IFRS.

Note 22: Portfolio Analysis by Type of Interest Rate

The table below includes the analysis of the Company’s bond portfolio by type of interest rate (fixed or variable).

	31/12/2025			
	(€ thousands)			
	Amortised cost	FVOCI	FVTPL	Total
Fixed interest rate	957,493	1,188,137	64,117	2,209,747
Variable interest rate	25,884	71,292	224	97,400
Total	983,377	1,259,429	64,341	2,307,147
	31/12/2024			
	(€ thousands)			
	Amortised cost	FVOCI	FVTPL	Total
Fixed interest rate	984,450	1,243,621	101,581	2,329,652
Variable interest rate	25,875	66,311	-	92,186
Total	1,010,325	1,309,932	101,581	2,421,838

Comparative figures have been restated to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits.
For further details, refer to Note 38.



Note 23: Other Receivables

This note analyses the Company’s total other receivables which have been broken down into other receivables within the scope of IFRS 9, which are measured at amortised cost, and other non-financial receivables, which are recognised in accordance with other IFRSs.

	31/12/2025	31/12/2024
	(€ thousands)	
Other financial receivables		
Amicable settlement claims	1,045	855
Other	95,245	59,382
Total other financial receivables	96,291	60,237
ECL allowance for other financial receivables	(57,107)	(57,792)
Total net other financial receivables	39,183	2,445
Other non-financial receivables		
Prepaid expenses	29,989	13,731
Other	2,265	1,249
Total other non-financial receivables	32,254	14,980
Total other receivables	71,437	17,425

Other receivables within the scope of IFRS 9 comprise receivables from sales partners, various other debtors, as well as intragroup receivables amounting to €37 million from the parent Company, Ethniki Holdings S.à r.l., arising from the sale of the subsidiary Ethniki Insurance (Cyprus) Limited.

The line item “Compensation through Friendly Settlement” represents receivables from insurance undertakings participating in the settlement scheme.

The impairment allowance has been calculated using the simplified approach adopted by the Company for other financial receivables measured at amortised cost.

The other non-financial receivables included in the table above primarily comprise prepaid expenses and various other amounts due.

Comparative figures have been reclassified to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits. For further details, please refer to Note 38.

Note 24: Cash and Cash Equivalents

	31/12/2025	31/12/2024
	(€ thousands)	
Cash in hand	4	5
Sight deposits	12,172	11,542
Time deposits with financial institutions	13,910	17,120
Cash and cash equivalents before ECL allowance	26,086	28,667
ECL allowance	(2)	(16)
Total cash and cash equivalents net of ECL allowance	26,084	28,651
Cash restricted	1,200	1,200
Total cash and cash equivalents	27,284	29,851

The carrying value of “Cash and cash equivalents” is considered to approximate its fair value at the end of the reporting period.

Comparative figures have been restated to reflect the revised presentation of accrued interest income on debt securities, loans and term deposits. For further details, please refer to Note 38.



Cash and cash equivalents by type of interest rate is analyzed in the following table:

	31/12/2025				31/12/2024			
	(€ thousands)							
	Cash in hand	Sight deposits	Time deposits with financial institutions	Total	Cash in hand	Sight deposits	Time deposits with financial institutions	Total
Fixed interest rate	-	412	13,909	14,320	-	1,401	17,104	18,504
Non interest bearing	4	11,760	-	11,764	5	10,141	-	10,146
Total	4	12,172	13,909	26,084	5	11,542	17,104	28,650

Note 25: Share Capital

The share capital of the Company as at 31 December 2025 amounts to €235,221 thousand, divided into 196,017,480 registered voting shares with a nominal value of €1.2 each. As at the same date, the Company is wholly owned by Ethniki Holdings S.à r.l., which holds 100% of its share capital.

In November 2025, Piraeus Financial Holdings S.A. completed the acquisition of 100% of the shares of Ethniki Holdings S.à r.l., the parent Company of Ethniki Insurance, from CVC Capital Partners Fund VII and National Bank of Greece. On 19 December 2025, the Bank announced that, following the registration of the decision of the Ministry of Development with the General Commercial Registry (“GEMI”) and the approval of the competent supervisory authority, namely the ECB acting through the SSM, the merger by absorption of Piraeus Financial Holdings by Piraeus Bank was completed.

Note 26: Reserves

	31/12/2025	31/12/2024
	(€ thousands)	
Statutory reserve	30,403	28,908
Special reserves	2,027	2,027
Extraordinary reserves	3	3
Revaluation reserve for debt securities measured at FVOCI	(109,595)	(66,196)
Insurance/ Reinsurance finance reserve	73,806	110,600
Liabilities from defined benefit plans	1,139	(854)
Share option plan	-	6,181
Total reserves	(2,217)	80,669

Movement of OCI reserve:

	31/12/2025	31/12/2024
	(€ thousands)	
Balance at beginning of the period	(66,196)	(65,819)
Transitional IFRS 9 impact	-	-
Net gains/(losses) from changes in fair value	(44,098)	1,662
Net (gains)/losses reclassified to profit or loss	73	(1,568)
Impairment gain/(loss)	625	(471)
Balance at end of the period	(109,595)	(66,196)

Statutory reserve: This reserve is recognized according to the provisions of Greek Law 4548/2018 and the Legal Decree 400/1970. In accordance with Article 18 of the Legal Decree 400/1970 at least one fifth of the Company's net annual profit is used for the recognition of the statutory reserve. Such obligation ceases when the reserve exceeds four times the share capital. As at 01 January 2016, the Legal Decree 400/1970 was replaced by the Greek Law 4364/2016, which does not provide for the recognition of a statutory reserve. Therefore, the provisions of Greek Law 4548/2018 apply, for the recognition of a statutory reserve at a rate of 5% on annual profit and up to a ratio of 1/3 of the paid share capital. Following the 181/ 26.08.2024 Extraordinary General Meeting, the Company approved the recognition of a statutory reserve amounting to € 2,045, prior to the dividend distribution.

Revaluation reserve for debt securities (measured at FVOCI): This reserve includes valuation of gains and losses on FVOCI securities and is transferred to profit or loss upon sale. Any realized gains or losses are taxed with the corporate income tax rate.

Insurance/ Reinsurance finance reserve: The Group has elected to disaggregate (re)insurance finance income or expenses between profit or loss and other comprehensive income (OCI) for the majority of its portfolios measured under GMM and PAA, with the resulting impact of changes in market interest rates on the value of the insurance and related reinsurance assets and liabilities being reflected in OCI. The OCI option is also applied to portfolios of reinsurance contracts held (see note 2.9.13).

Extraordinary reserves: These reserves have been established in the past pursuant to a resolution of the Company's General Meeting, comprise of special reserves from the merger of subsidiaries and can be distributed to the Company's shareholders with no further tax levied following a resolution of the General Meeting.

Obligations from defined benefit plans: This reserve is established in line with IAS 19, as revised, and includes actuarial gains and losses from the Company's defined benefit plans. Changes in the reserve over the year are presented in Note 32.



Note 27: Retained Earnings

Retained earnings for the 2025 financial year include gains arising from the disposal of European Union bonds, as well as interest income from Greek government bonds and treasury bills which, pursuant to POL 1032/2015 and Law 5045/2023 respectively, are exempt from income tax.

In accordance with Article 47, paragraph 1 of Law 4172/2013, these amounts will become taxable upon distribution or capitalisation.

The gains for which taxation has been deferred amount to €11,869 thousand.

Note 28: Investment Contract Liabilities

	31/12/2025	31/12/2024
	(€ thousands)	
Group investment contracts		
Balance at beginning of the period	259,942	259,185
Contributions	39,207	36,565
Withdrawals	(41,167)	(34,391)
Interest	3,415	3,729
Other movements	(3,185)	(5,145)
Balance at end of the period	258,211	259,942
Investment contracts to individuals		
Balance at beginning of the period	770,186	790,810
Reserve release	(62,010)	(66,762)
New policies	-	-
Change in reserve	40,390	43,190
Other movements	2,196	2,948
Balance at end of the period	750,762	770,186
Total investment contract liabilities	1,008,973	1,030,128

Within line “Investment contracts to individuals” endowment contracts with premium return in case of death of amount €748,492 thousands (2024: €767,771 thousands) and Unit-Linked contracts of amount €2,270 thousands (2024: €2,415 thousands), are included.

Investment contract liabilities are in scope of IFRS 9. The vast majority is classified as measured at amortised cost €988,383 thousands (2024: €1,006,595 thousands) while the remaining €20,589 thousand is carried at fair value through profit or loss (2024: €23,533 thousand). The fair value of the investment contract liabilities that were classified as measured at amortised cost was estimated to be €925,813 thousand (2024: €961,743 thousand).

Note 29: Other Liabilities

	31/12/2025	31/12/2024
	(€ thousands)	
Amounts due to brokers and agents	16,161	13,276
Payable expenses and deferred income	10,928	11,049
Creditors and suppliers	4,783	8,153
Taxes and duties	3,757	3,155
Amounts due to social security organizations	1,759	1,658
Provision for third party claims against the Company	10,818	11,678
Provision for accrued expenses	14,877	12,030
Other liabilities	16,914	9,153
Total other liabilities	79,997	70,152

The Company is involved, in its capacity both as defendant and claimant, in various legal proceedings and arbitration cases arising in the normal course of business. Management, together with the Company’s legal advisors, expects that all outstanding cases will be resolved without any material adverse impact on the Company’s financial position or operating results.

The Company has recognised a provision for those legal cases where a loss is considered probable. A table presenting the movement in the provision for these matters is set out below.

	31/12/2025	31/12/2024
	(€ thousands)	
Balance at beginning of the period	11,678	8,785
Provision charge / (release)	2,385	2,893
Provisions utilised	(3,245)	-
Other movements	-	-
Balance at end of the period	10,818	11,678

Lease liabilities recognised under IFRS 16 are included within “Other liabilities” and amounted to €1,874 thousand as at 31 December 2025 (2024: €1,606 thousand) (see Note 2.14).

The line item “Accrued expenses and deferred income” includes an amount of €6,120 thousand relating to deferred income associated with the property “Elliniko Plot – 35th Street” (see Note 13).



Note 30: Financial Liabilities

	31/12/2025	31/12/2024
	(€ thousands)	
Short-term borrowings	2,127	2,128
Long-term borrowings	175,000	175,000
Total borrowed funds	177,127	177,128

The Company has issued a subordinated loan of indefinite duration of €50,000 thousands, out of which €45,000 thousands is held by National Bank of Greece (NBG) and €5,000 thousands is held by NBG Bank Malta (a subsidiary of NBG). On 20 May 2022, NBG Bank Malta transferred all bonds held by it to NBG, which subsequently became the sole bondholder.

The interest rate of the loan is equal to the 6-month EURIBOR plus a margin of 800 basis points. The loan meets the criteria for classification under Equity Category 1, in accordance with the provisions of the Solvency II framework.

Additionally, the Company has entered into a ten-year subordinated bond loan of €125,000 thousand with NBG. The loan bears a fixed interest rate of 650 basis points (6.50%) throughout its term. The loan qualifies as Tier 2 own funds under the provisions of the Solvency II framework.

The fair value of the Company’s borrowings does not differ materially from their carrying amount as at the reporting date.

Note 31: Insurance & Reinsurance Contract Assets & Liabilities

31.1 Breakdown of portfolios

The breakdown of groups of insurance and reinsurance contracts issued, and reinsurance contracts held, that are in an asset position and those in a liability position is set out in the table below:

31/12/2025	(€ thousands)		
	Assets	Liabilities	Net
Insurance contracts			
Life Risk & Savings	(94)	1,290,111	1,290,016
Participating	-	393,922	393,922
Life & Health	-	97,286	97,286
Motor	-	177,375	177,375
Other non-Life	(657)	204,684	204,027
Total insurance contracts	(751)	2,163,377	2,162,626
Reinsurance contracts held			
Life Risk & Savings	(11)	531	519
Participating	-	-	-
Life & Health	(856)	-	(856)
Motor	(1,872)	-	(1,872)
Other non-Life	(144,712)	1,051	(143,661)
Total reinsurance contracts held	(147,452)	1,582	(145,870)

31/12/2024	(€ thousands)		
	Assets	Liabilities	Net
Insurance contracts			
Life Risk & Savings	(32,916)	1,300,545	1,267,629
Participating	-	422,935	422,935
Life & Health	-	87,779	87,779
Motor	-	171,818	171,818
Other non-Life	(2)	344,214	344,212
Total insurance contracts	(32,918)	2,327,291	2,294,373
Reinsurance contracts held			
Life Risk & Savings	(9)	528	519
Participating	-	-	-
Life & Health	(1,391)	-	(1,391)
Motor	(1,876)	-	(1,876)
Other non-Life	(285,870)	3,510	(282,360)
Total reinsurance contracts held	(289,146)	4,038	(285,108)



31.2 Reconciliation of the liability for remaining coverage and liability for incurred claims (LIC)

The reconciliation of the net asset or liability for insurance contracts issued, analysing the liability for remaining coverage and the liability for incurred claims for Life Risk & Savings portfolios is disclosed in the table below:

31/12/2025		(€ thousands)			
Life Risk & Savings - Insurance contracts issued		Liabilities for remaining coverage		Liabilities for incurred claims	
		Excluding loss component	Loss component	Contracts not under PAA	Assets for insurance acquisition cash flows
Insurance contract liabilities as at 01/01		1,030,644	153,432	116,469	-
Insurance contract assets as at 01/01		(49,332)	4,585	11,831	-
Net insurance contract (assets)/liabilities as at 01/01		981,312	158,017	128,300	-
Insurance revenue					
Contracts under modified retrospective approach		-	-	-	-
Contracts under fair value approach		(138,836)	-	-	-
Other contracts		(53,262)	-	-	-
		(192,098)	-	-	-
Insurance service expenses					
Incurred claims and other directly attributable expenses		-	(5,538)	212,485	-
Amortisation of insurance acquisition cash flows		8,389	-	-	-
Changes to liabilities for incurred claims		-	-	(30,835)	-
Losses on onerous contracts and reversals of those losses			25,378	-	-
		8,389	19,840	181,650	-
Investment components		(66,163)	-	66,163	-
Insurance service result		(249,871)	19,840	247,813	-
Insurance finance expenses		54,022	2,712	(3,936)	-
Effect of movements in exchange rates		-	-	-	-
Total changes in the statement of profit or loss and OCI		(195,849)	22,552	243,877	-
Cash flows					
Premiums received		200,215	-	-	-
Claims and other expenses paid		-	-	(223,497)	-
Insurance acquisition cash flows		(24,911)	-	-	-
Total cash flows		175,304	-	(223,497)	-
Other movements					
Transfer to other items in the statement of financial position		-	-	-	-
Release from asset for insurance acquisition cash flows		-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12		960,767	180,569	148,680	-
Insurance contract liabilities as at 31/12		964,902	176,671	148,538	-
Insurance contract assets as at 31/12		(4,134)	3,898	142	-
Net insurance contract (assets)/liabilities as at 31/12		960,767	180,569	148,680	-



31/12/2024

(€ thousands)

Life Risk & Savings -
Insurance contracts issued

	Liabilities for remaining coverage		Liabilities for incurred claims		Assets for insurance acquisition cash flows	Total
	Excluding loss component	Loss component	Contracts not under PAA			
Insurance contract liabilities as at 01/01	1,092,751	154,793	116,565	-		1,364,108
Insurance contract assets as at 01/01	(65,106)	10,374	12,225	-		(42,508)
Net insurance contract (assets)/liabilities as at 01/01	1,027,645	165,166	128,790	-		1,321,601
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-		-
Contracts under fair value approach	(123,529)	-	-	-		(123,529)
Other contracts	(41,248)	-	-	-		(41,248)
	(164,777)	-	-	-		(164,777)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	(5,241)	168,020	-		162,779
Amortisation of insurance acquisition cash flows	7,893	-	-	-		7,893
Changes to liabilities for incurred claims	-	-	11,847	-		11,847
Losses on onerous contracts and reversals of those losses	-	(4,466)	-	-		(4,466)
	7,893	(9,707)	179,867	-		178,053
Investment components	(78,039)	-	78,039	-		-
Insurance service result	(234,922)	(9,707)	257,906	-		13,277
Insurance finance expenses	15,750	2,557	(68)	-		18,239
Effect of movements in exchange rates	-	-	-	-		-
Total changes in the statement of profit or loss and OCI	(219,172)	(7,150)	257,838	-		31,516
Cash flows						
Premiums received	200,266	-	-	-		200,266
Claims and other expenses paid	-	-	(258,327)	-		(258,327)
Insurance acquisition cash flows	(27,427)	-	-	-		(27,427)
Total cash flows	172,839	-	(258,327)	-		(85,488)
Other movements	-	-	-	-		-
Transfer to other items in the statement of financial position	-	-	-	-		-
Release from asset for insurance acquisition cash flows	-	-	-	-		-
Net insurance contract (assets)/liabilities as at 31/12	981,312	158,017	128,300	-		1,267,629
Insurance contract liabilities as at 31/12	1,030,644	153,432	116,469	-		1,300,545
Insurance contract assets as at 31/12	(49,332)	4,585	11,831	-		(32,916)
Net insurance contract (assets)/liabilities as at 31/12	981,312	158,017	128,300	-		1,267,629



The reconciliation of the net asset or liability for insurance contracts issued, analysing the liability for remaining coverage and the liability for incurred claims for Participating portfolio is disclosed in the table below:

31/12/2025 Direct participating - Insurance contracts issued	(€ thousands)				
	Liabilities for remaining coverage		Liabilities for incurred claims		Total
	Excluding loss component	Loss component	Contracts not under PAA	Assets for insurance acquisition cash flows	
Insurance contract liabilities as at 01/01	381,622	97	41,216	-	422,935
Insurance contract assets as at 01/01	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	381,622	97	41,216	-	422,935
Insurance revenue					
Contracts under modified retrospective approach	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-
Other contracts	(2,729)	-	-	-	(2,729)
	(2,729)	-	-	-	(2,729)
Insurance service expenses					
Incurred claims and other directly attributable expenses	-	(12)	74	-	62
Amortisation of insurance acquisition cash flows	1,724	-	-	-	1,724
Changes to liabilities for incurred claims			-	-	-
Losses on onerous contracts and reversals of those losses	-	(2)	-	-	(2)
	1,724	(14)	74	-	1,783
Investment components	(99,486)	-	99,486	-	-
Insurance service result	(100,491)	(14)	99,560	-	(946)
Insurance finance expenses	23,835	-	-	-	23,835
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(76,656)	(14)	99,560	-	22,889
Cash flows					
Premiums received	83,882	-	-	-	83,882
Claims and other expenses paid	-	-	(127,203)	-	(127,203)
Insurance acquisition cash flows	(8,581)	-	-	-	(8,581)
Total cash flows	75,301	-	(127,203)	-	(51,902)
Other movements	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	380,266	83	13,573	-	393,922
Insurance contract liabilities as at 31/12	380,266	83	13,573	-	393,922
Insurance contract assets as at 31/12	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	380,266	83	13,573	-	393,922



31/12/2024

(€ thousands)

Direct participating -
Insurance contracts issued

	Excluding loss component	Loss component	Contracts not under PAA	Assets for insurance acquisition cash flows	Total
Insurance contract liabilities as at 01/01	410,189	11	13,339	-	423,540
Insurance contract assets as at 01/01	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	410,189	11	13,339	-	423,540
Insurance revenue					
Contracts under modified retrospective approach	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-
Other contracts	(4,765)	-	-	-	(4,765)
	(4,765)	-	-	-	(4,765)
Insurance service expenses					
Incurred claims and other directly attributable expenses	-	(11)	1,290	-	1,279
Amortisation of insurance acquisition cash flows	1,149	-	-	-	1,149
Changes to liabilities for incurred claims	-	-	916	-	916
Losses on onerous contracts and reversals of those losses	-	97	-	-	97
	1,149	86	2,206	-	3,441
Investment components	(190,182)	-	190,182	-	-
Insurance service result	(193,799)	86	192,389	-	(1,324)
Insurance finance expenses	26,988	-	-	-	26,988
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(166,811)	86	192,389	-	25,664
Cash flows					
Premiums received	145,204	-	-	-	145,204
Claims and other expenses paid	-	-	(164,513)	-	(164,513)
Insurance acquisition cash flows	(6,961)	-	-	-	(6,961)
Total cash flows	138,243	-	(164,513)	-	(26,270)
Other movements	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	381,622	97	41,216	-	422,935
Insurance contract liabilities as at 31/12	381,622	97	41,216	-	422,935
Insurance contract assets as at 31/12	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	381,622	97	41,216	-	422,935



The reconciliation of the net asset or liability for insurance contracts issued, analysing the liability for remaining coverage and the liability for incurred claims for Life & Health portfolio is disclosed in the table below:

31/12/2025 Life & Health Insurance contracts issued	(€ thousands)					
	Liabilities for remaining coverage		Liabilities for incurred claims			Total
	Excluding loss component	Loss component	Estimates of the present value of future cash flows	Risk adjustment	Assets for insurance acquisition cash flows	
Insurance contract liabilities as at 01/01	25,358	1	60,328	2,092	-	87,779
Insurance contract assets as at 01/01	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	25,358	1	60,328	2,092	-	87,779
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-	-
Other contracts	(219,490)	-	-	-	-	(219,490)
	(219,490)	-	-	-	-	(219,490)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	-	141,417	980	-	142,397
Amortisation of insurance acquisition cash flows	55,830	-	-	-	-	55,830
Changes to liabilities for incurred claims	-	-	11,078	(549)	-	10,530
Losses on onerous contracts and reversals of those losses	-	1	-	-	-	1
	55,830	1	152,495	431	-	208,757
Investment components	-	-	-	-	-	-
Insurance service result	(163,660)	1	152,495	431	-	(10,733)
Insurance finance expenses	-	-	868	-	-	868
Effect of movements in exchange rates	-	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(163,660)	1	153,364	431	-	(9,864)
Cash flows						
Premiums received	220,903	-	-	-	-	220,903
Claims and other expenses paid	-	-	(143,403)	-	-	(143,403)
Insurance acquisition cash flows	(58,128)	-	-	-	-	(58,128)
Total cash flows	162,775	-	(143,403)	-	-	19,372
Other movements	-	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	24,473	2	70,289	2,523	-	97,286
Insurance contract liabilities as at 31/12	24,473	2	70,289	2,523	-	97,286
Insurance contract assets as at 31/12	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	24,473	2	70,289	2,523	-	97,286



31/12/2024

Life & Health -
Insurance contracts issued

(€ thousands)

	Liabilities for remaining coverage		Liabilities for incurred claims		Assets for insurance acquisition cash flows	Total
	Excluding loss component	Loss component	Estimates of the present value of future cash flows	Risk adjustment		
Insurance contract liabilities as at 01/01	19,354	-	58,414	2,009	-	79,776
Insurance contract assets as at 01/01	14	-	(48)	-	-	(34)
Net insurance contract (assets)/liabilities as at 01/01	19,368	-	58,366	2,009	-	79,742
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-	-
Other contracts	(191,644)	-	-	-	-	(191,644)
	(191,644)	-	-	-	-	(191,644)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	-	148,989	820	-	149,809
Amortisation of insurance acquisition cash flows	49,091	-	-	-	-	49,091
Changes to liabilities for incurred claims	-	-	(14,131)	(736)	-	(14,868)
Losses on onerous contracts and reversals of those losses	-	1	-	-	-	1
	49,091	1	134,857	84	-	184,033
Investment components	-	-	-	-	-	-
Insurance service result	(142,553)	1	134,857	84	-	(7,611)
Insurance finance expenses	-	-	933	-	-	933
Effect of movements in exchange rates	-	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(142,553)	1	135,790	84	-	(6,678)
Cash flows						
Premiums received	198,076	-	-	-	-	198,076
Claims and other expenses paid	-	-	(133,828)	-	-	(133,828)
Insurance acquisition cash flows	(49,533)	-	-	-	-	(49,533)
Total cash flows	148,543	-	(133,828)	-	-	14,715
Other movements	-	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	25,358	1	60,328	2,092	-	87,779
Insurance contract liabilities as at 31/12	25,358	1	60,328	2,092	-	87,779
Insurance contract assets as at 31/12	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	25,358	1	60,328	2,092	-	87,779



The reconciliation of the net asset or liability for insurance contracts issued, analysing the liability for remaining coverage and the liability for incurred claims for Motor portfolio, is disclosed in the table below:

31/12/2025 Motor - Insurance contracts issued	(€ thousands)					
	Liabilities for remaining coverage		Liabilities for incurred claims			Total
	Excluding loss component	Loss component	Estimates of the present value of future cash flows	Risk adjustment	Assets for insurance acquisition cash flows	
Insurance contract liabilities as at 01/01	22,064	1	143,356	6,397	-	171,818
Insurance contract assets as at 01/01	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	22,064	1	143,356	6,397	-	171,818
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-	-
Other contracts	(74,220)	-	-	-	-	(74,220)
	(74,220)	-	-	-	-	(74,220)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	-	48,783	20	-	48,803
Amortisation of insurance acquisition cash flows	16,088	-	-	-	-	16,088
Changes to liabilities for incurred claims	-	-	(2,137)	(257)	-	(2,394)
Losses on onerous contracts and reversals of those losses	-	-	-	-	-	-
	16,088	-	46,646	(237)	-	62,498
Investment components	-	-	-	-	-	-
Insurance service result	(58,132)	-	46,646	(237)	-	(11,722)
Insurance finance expenses	-	-	3,646	-	-	3,646
Effect of movements in exchange rates	-	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(58,132)	-	50,292	(237)	-	(8,076)
Cash flows						
Premiums received	80,847	-	-	-	-	80,847
Claims and other expenses paid	-	-	(50,329)	-	-	(50,329)
Insurance acquisition cash flows	(16,884)	-	-	-	-	(16,884)
Total cash flows	63,963	-	(50,329)	-	-	13,634
Other movements	-	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	27,895	1	143,319	6,160	-	177,375
Insurance contract liabilities as at 31/12	27,895	1	143,319	6,160	-	177,375
Insurance contract assets as at 31/12	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	27,895	1	143,319	6,160	-	177,375



31/12/2024

(€ thousands)

Motor -
Insurance contracts issued

	Liabilities for remaining coverage		Liabilities for incurred claims		Assets for insurance acquisition cash flows	Total
	Excluding loss component	Loss component	Estimates of the present value of future cash flows	Risk adjustment		
Insurance contract liabilities as at 01/01	18,996	-	151,119	6,834	-	176,949
Insurance contract assets as at 01/01	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	18,996	-	151,119	6,834	-	176,949
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-	-
Other contracts	(66,008)	-	-	-	-	(66,008)
	(66,008)	-	-	-	-	(66,008)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	-	51,556	740	-	52,296
Amortisation of insurance acquisition cash flows	13,204	-	-	-	-	13,204
Changes to liabilities for incurred claims	-	-	(8,629)	(1,177)	-	(9,806)
Losses on onerous contracts and reversals of those losses	-	1	-	-	-	1
	13,204	1	42,926	(437)	-	55,695
Investment components	-	-	-	-	-	-
Insurance service result	(52,804)	1	42,926	(437)	-	(10,314)
Insurance finance expenses	-	-	220	-	-	220
Effect of movements in exchange rates	-	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(52,804)	1	43,146	(437)	-	(10,094)
Cash flows						
Premiums received	69,115	-	-	-	-	69,115
Claims and other expenses paid	-	-	(50,909)	-	-	(50,909)
Insurance acquisition cash flows	(13,244)	-	-	-	-	(13,244)
Total cash flows	55,871	-	(50,909)	-	-	4,962
Other movements	-	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	22,064	1	143,356	6,397	-	171,818
Insurance contract liabilities as at 31/12	22,064	1	143,356	6,397	-	171,818
Insurance contract assets as at 31/12	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	22,064	1	143,356	6,397	-	171,818



The reconciliation of the net asset or liability for insurance contracts issued, analysing the liability for remaining coverage and the liability for incurred claims for Other non-Life portfolios, is disclosed in the table below:

31/12/2025

(€ thousands)

**Other Non Life -
Insurance contracts issued**

	Liabilities for remaining coverage		Liabilities for incurred claims		Assets for insurance acquisition cash flows	Total
	Excluding loss component	Loss component	Estimates of the present value of future cash flows	Risk adjustment		
Insurance contract liabilities as at 01/01	33,059	124	294,286	16,746	-	344,214
Insurance contract assets as at 01/01	(2)	-	-	-	-	(2)
Net insurance contract (assets)/liabilities as at 01/01	33,057	124	294,286	16,746	-	344,212
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-	-
Other contracts	(167,926)	-	-	-	-	(167,926)
	(167,926)	-	-	-	-	(167,926)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	-	31,424	(6,133)	-	25,291
Amortisation of insurance acquisition cash flows	29,066	-	-	-	-	29,066
Changes to liabilities for incurred claims	-	-	(10,603)	(543)	-	(11,146)
Losses on onerous contracts and reversals of those losses	-	(122)	-	-	-	(122)
	29,066	(122)	20,821	(6,676)	-	43,089
Investment components	-	-	-	-	-	-
Insurance service result	(138,860)	(122)	20,821	(6,676)	-	(124,837)
Insurance finance expenses	-	-	8,599	-	-	8,599
Effect of movements in exchange rates	-	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(138,860)	(122)	29,420	(6,676)	-	(116,239)
Cash flows						
Premiums received	171,488	-	-	-	-	171,488
Claims and other expenses paid	-	-	(164,410)	-	-	(164,410)
Insurance acquisition cash flows	(31,025)	-	-	-	-	(31,025)
Total cash flows	140,463	-	(164,410)	-	-	(23,947)
Other movements	-	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	34,659	2	159,296	10,070	-	204,027
Insurance contract liabilities as at 31/12	35,335	2	159,278	10,070	-	204,684
Insurance contract assets as at 31/12	(675)	-	18	-	-	(657)
Net insurance contract (assets)/liabilities as at 31/12	34,659	2	159,296	10,070	-	204,027



31/12/2024

(€ thousands)

Other Non Life -
Insurance contracts issued

	Liabilities for remaining coverage		Liabilities for incurred claims		Assets for insurance acquisition cash flows	Total
	Excluding loss component	Loss component	Estimates of the present value of future cash flows	Risk adjustment		
Insurance contract liabilities as at 01/01	20,657	-	211,930	11,518	-	244,105
Insurance contract assets as at 01/01	(193)	-	30	17	-	(146)
Net insurance contract (assets)/liabilities as at 01/01	20,464	-	211,960	11,535	-	243,959
Insurance revenue						
Contracts under modified retrospective approach	-	-	-	-	-	-
Contracts under fair value approach	-	-	-	-	-	-
Other contracts	(145,320)	-	-	-	-	(145,320)
	(145,320)	-	-	-	-	(145,320)
Insurance service expenses						
Incurred claims and other directly attributable expenses	-	-	208,468	5,373	-	213,841
Amortisation of insurance acquisition cash flows	22,390	-	-	-	-	22,390
Changes to liabilities for incurred claims	-	-	(2,995)	(162)	-	(3,156)
Losses on onerous contracts and reversals of those losses	-	-	-	-	-	124
	22,390	124	205,473	5,212	-	233,198
Investment components	-	-	-	-	-	-
Insurance service result	(122,930)	124	205,473	5,212	-	87,878
Insurance finance expenses	-	-	(2,865)	-	-	(2,865)
Effect of movements in exchange rates	-	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(122,930)	124	202,609	5,212	-	85,014
Cash flows						
Premiums received	160,943	-	-	-	-	160,943
Claims and other expenses paid	-	-	(120,283)	-	-	(120,283)
Insurance acquisition cash flows	(25,421)	-	-	-	-	(25,421)
Total cash flows	135,522	-	(120,283)	-	-	15,239
Other movements	-	-	-	-	-	-
Transfer to other items in the statement of financial position	-	-	-	-	-	-
Release from asset for insurance acquisition cash flows	-	-	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	33,057	124	294,286	16,746	-	344,212
Insurance contract liabilities as at 31/12	33,059	124	294,286	16,746	-	344,214
Insurance contract assets as at 31/12	(2)	-	-	-	-	(2)
Net insurance contract (assets)/liabilities as at 31/12	33,057	124	294,286	16,746	-	344,212



31.3 Movement analysis of the net assets or liability for reinsurance contracts held

The reconciliation of the net asset or liability for reinsurance contracts held analysing assets for remaining coverage and amounts recoverable on incurred claims arising on Life Risk & Savings portfolio is disclosed in the table below:

31/12/2025 Life Risk & Savings - Reinsurance contracts held	(€ thousands)				
	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Contracts under PAA		Total
			Estimates of the present value of future cash flows	Risk adjustment	
Reinsurance contract assets as at 01/01	709	-	(700)	-	9
Reinsurance contract liabilities as at 01/01	(582)	-	7	47	(528)
Net reinsurance contract assets/(liabilities) as at 01/01	127	-	(693)	47	(519)
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(572)	-	-	-	(572)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	120	49	170
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	3	(47)	(44)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	123	2	126
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	-	-	-
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(572)	-	123	2	(447)
Reinsurance finance income	(4)	-	(23)	-	(27)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(576)	-	100	2	(473)
Cash flows					
Premiums paid	585	-	-	-	585
Amount received	(51)	-	(62)	-	(113)
Total cash flows	535	-	(62)	-	473
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	86	-	(655)	49	(519)
Reinsurance contract assets as at 31/12	164	-	(153)	-	11
Reinsurance contract liabilities as at 31/12	(78)	-	(502)	49	(531)
Net insurance contract assets/(liabilities) as at 31/12	86	-	(655)	49	(519)



31/12/2024

(€ thousands)

Life Risk & Savings -
Reinsurance contracts held

	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	Total
Reinsurance contract assets as at 01/01	-	-	-	-	-
Reinsurance contract liabilities as at 01/01	(4,323)	-	1,640	51	(2,632)
Net reinsurance contract assets/(liabilities) as at 01/01	(4,323)	-	1,640	51	(2,632)
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(525)	-	-	-	(525)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	78	47	125
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(50)	(51)	(101)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	28	(4)	25
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	-	-	-
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(525)	-	28	(4)	(500)
Reinsurance finance income	-	-	(21)	-	(21)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(525)	-	7	(4)	(521)
Cash flows					
Premiums paid	4,971	-	-	-	4,971
Amount received	4	-	(2,341)	-	(2,337)
Total cash flows	4,975	-	(2,341)	-	2,634
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	127	-	(694)	47	(519)
Reinsurance contract assets as at 31/12	709	-	(700)	-	9
Reinsurance contract liabilities as at 31/12	(582)	-	7	47	(528)
Net insurance contract assets/(liabilities) as at 31/12	127	-	(693)	47	(519)



The reconciliation of the net asset or liability for reinsurance contracts held analysing assets for remaining coverage and amounts recoverable on incurred claims arising on Life & Health portfolio is disclosed in the table below:

31/12/2025

(€ thousands)

Life & Health

	Assets for remaining coverage		Amounts recoverable on incurred claims		Total
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	
Reinsurance contract assets as at 01/01	795	-	573	23	1,391
Reinsurance contract liabilities as at 01/01	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 01/01	795	-	573	23	1,391
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(5,402)	-	-	-	(5,402)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	1,197	3	1,200
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(239)	(23)	(262)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	959	(20)	939
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	10	-	10
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(5,402)	-	968	(20)	(4,454)
Reinsurance finance income	(40)	-	10	-	(30)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(5,443)	-	978	(20)	(4,484)
Cash flows					
Premiums paid	10,021	-	-	-	10,021
Amount received	(4,670)	-	(1,402)	-	(6,072)
Total cash flows	5,351	-	(1,402)	-	3,949
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	703	-	150	3	856
Reinsurance contract assets as at 31/12	703	-	150	3	856
Reinsurance contract liabilities as at 31/12	-	-	-	-	-
Net insurance contract assets/(liabilities) as at 31/12	703	-	150	3	856



31/12/2024

(€ thousands)

Life & Health -
Reinsurance contracts held

	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	Total
Reinsurance contract assets as at 01/01	677	-	732	52	1,461
Reinsurance contract liabilities as at 01/01	(1,792)	-	977	5	(810)
Net reinsurance contract assets/(liabilities) as at 01/01	(1,115)	-	1,709	58	651
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(4,484)	-	-	-	(4,484)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	818	23	841
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(431)	(58)	(488)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	387	(34)	353
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	(11)	-	(11)
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(4,484)	-	377	(34)	(4,142)
Reinsurance finance income	(48)	-	30	-	(18)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(4,532)	-	407	(34)	(4,160)
Cash flows					
Premiums paid	11,947	-	-	-	11,947
Amount received	(5,505)	-	(1,542)	-	(7,047)
Total cash flows	6,442	-	(1,542)	-	4,900
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	795	-	573	23	1,391
Reinsurance contract assets as at 31/12	795	-	573	23	1,391
Reinsurance contract liabilities as at 31/12	-	-	-	-	-
Net insurance contract assets/(liabilities) as at 31/12	795	-	573	23	1,391



The reconciliation of the net asset or liability for reinsurance contracts held analysing assets for remaining coverage and amounts recoverable on incurred claims arising on Motor portfolio is disclosed in the table below:

31/12/2025

(€ thousands)

**Motor -
Reinsurance contracts held**

	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	Total
Reinsurance contract assets as at 01/01	(376)	-	2,168	84	1,876
Reinsurance contract liabilities as at 01/01	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 01/01	(376)	-	2,168	84	1,876
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(4,920)	-	-	-	(4,920)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	20	79	99
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(59)	(84)	(143)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	(39)	(5)	(44)
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	2	-	2
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(4,920)	-	(37)	(5)	(4,963)
Reinsurance finance income	-	-	(29)	-	(29)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(4,920)	-	(67)	(5)	(4,992)
Cash flows					
Premiums paid	4,853	-	-	-	4,853
Amount received	-	-	135	-	135
Total cash flows	4,853	-	135	-	4,988
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	(443)	-	2,237	79	1,872
Reinsurance contract assets as at 31/12	(443)	-	2,237	79	1,872
Reinsurance contract liabilities as at 31/12	-	-	-	-	-
Net insurance contract assets/(liabilities) as at 31/12	(443)	-	2,237	79	1,872



31/12/2024

(€ thousands)

Motor -
Reinsurance contracts held

	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	Total
Reinsurance contract assets as at 01/01	1,455	-	441	103	1,999
Reinsurance contract liabilities as at 01/01	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 01/01	1,455	-	441	103	1,999
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	-	-	-	-	(3,959)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	9	84	93
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(361)	103	(464)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	(352)	(19)	(371)
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	-	-	-
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(3,959)	-	(352)	(19)	(4,330)
Reinsurance finance income	-	-	(67)	-	(67)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(3,959)	-	(419)	(19)	(4,397)
Cash flows					
Premiums paid	2,129	-	-	-	2,129
Amount received	-	-	2,146	-	2,146
Total cash flows	2,129	-	2,146	-	4,275
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	(375)	-	2,168	84	1,876
Reinsurance contract assets as at 31/12	(376)	-	2,168	84	1,876
Reinsurance contract liabilities as at 31/12	-	-	-	-	-
Net insurance contract assets/(liabilities) as at 31/12	(376)	-	2,168	84	1,876



The reconciliation of the net asset or liability for reinsurance contracts held analysing assets for remaining coverage and amounts recoverable on incurred claims arising on Other Non-Life portfolio is disclosed in the table below:

31/12/2025 Other non life - Reinsurance contracts held	(€ thousands)				
	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	Total
Reinsurance contract assets as at 01/01	15,652	-	255,757	14,461	285,870
Reinsurance contract liabilities as at 01/01	(3,672)	-	123	40	(3,510)
Net reinsurance contract assets/(liabilities) as at 01/01	11,980	-	255,880	14,500	282,360
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(108,094)	-	-	-	(108,094)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	168,127	7,446	175,573
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(168,951)	(14,500)	(183,451)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	(824)	(7,054)	(7,878)
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	123	-	123
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(108,094)	-	(701)	(7,054)	(115,849)
Reinsurance finance income	-	-	9,211	-	9,211
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(108,094)	-	8,510	(7,054)	(106,638)
Cash flows					
Premiums paid	115,060	-	-	-	115,060
Amount received	(6,600)	-	(140,521)	-	(147,121)
Total cash flows	108,460	-	(140,521)	-	(32,061)
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	12,346	-	123,869	7,446	143,661
Reinsurance contract assets as at 31/12	13,469	-	123,837	7,406	144,712
Reinsurance contract liabilities as at 31/12	(1,123)	-	32	40	(1,051)
Net insurance contract assets/(liabilities) as at 31/12	12,346	-	123,869	7,446	143,661



31/12/2024

(€ thousands)

Other non life -
Reinsurance contracts held

	Assets for remaining coverage		Amounts recoverable on incurred claims		
	Excluding loss recovery component	Loss recovery component	Estimates of the present value of future cash flows	Risk adjustment	Total
Reinsurance contract assets as at 01/01	11,823	-	166,356	8,423	186,602
Reinsurance contract liabilities as at 01/01	(9,081)	-	2,020	378	(6,684)
Net reinsurance contract assets/(liabilities) as at 01/01	2,741	-	168,376	8,801	179,918
Allocation of reinsurance premiums					
Amounts relating to the changes in the assets for remaining coverage	(88,280)	-	-	-	(88,280)
Recognition of loss-recovery from onerous underlying contracts	-	-	-	-	-
Reversal of loss-recovery from onerous underlying contracts	-	-	-	-	-
Amounts recoverable for claims and other expenses incurred in the period	-	-	258,714	14,500	273,214
Changes in amounts recoverable arising from changes in liability for incurred claims	-	-	(70,121)	(8,801)	(78,922)
Changes in fulfilment cash flows which relate to onerous underlying contracts	-	-	-	-	-
Amounts recoverable from reinsurers	-	-	188,593	5,699	194,292
Reinsurance Investment components	-	-	-	-	-
Effect of changes in non-performance risk of reinsurers	-	-	71	-	71
Cost of retroactive cover on reinsurance contracts held	-	-	-	-	-
Net income or expense from reinsurance contracts held	(88,280)	-	188,664	5,699	106,083
Reinsurance finance income	-	-	(1,214)	-	(1,214)
Effect of movements in exchange rates	-	-	-	-	-
Total changes in the statement of profit or loss and OCI	(88,280)	-	187,450	5,699	104,869
Cash flows					
Premiums paid	105,593	-	-	-	105,593
Amount received	(8,075)	-	(99,945)	-	(108,020)
Total cash flows	97,518	-	(99,945)	-	(2,427)
Other movements	-	-	-	-	-
Net reinsurance contract assets/(liabilities) as at 31/12	11,980	-	255,880	14,500	282,360
Reinsurance contract assets as at 31/12	15,652	-	255,757	14,461	285,870
Reinsurance contract liabilities as at 31/12	(3,672)	-	123	40	(3,510)
Net insurance contract assets/(liabilities) as at 31/12	11,980	-	255,880	14,500	282,360



31.4 Reconciliation of the measurement component of insurance contract balances

The table below presents a reconciliation of the net asset or liability for insurance contracts issued split by measurement component of estimates of the present value of future cash flows, risk adjustment and CSM for Life Risk & Savings portfolios:

31/12/2025

Life Risk & Savings - Insurance contracts issued	Estimates of the present value of future cash flows	Risk adjustment	Contractual service margin	Total
Insurance contract liabilities as at 01/01	865,478	68,371	366,697	1,300,545
Insurance contract assets as at 01/01	(252,442)	27,493	192,032	(32,916)
Net insurance contract (assets)/liabilities as at 01/01	613,036	95,864	558,729	1,267,629
Changes that relate to current service				
Contractual service margin recognised for services provided	-	-	(25,216)	(25,216)
Risk adjustment recognised for the risk expired	-	737	-	737
Experience adjustments	47,718	-	-	47,718
Changes that relate to future service				
Contracts initially recognised in the period	(6,644)	907	5,845	108
Changes in estimates that adjust the contractual service margin	(16,259)	3,497	12,762	-
Changes in estimates that do not adjust the contractual service margin	24,761	509	-	25,270
Changes that relate to past service				
Adjustments to liabilities for incurred claims	(27,645)	(3,190)	-	(30,835)
Insurance service result	21,931	2,460	(6,609)	17,782
Insurance finance expenses	48,197	-	4,601	52,798
Effect of movements in exchange rates	-	-	-	-
Total changes in the statement of profit or loss and OCI	70,127	2,460	(2,008)	70,580
Cash flows				
Premiums received	200,215	-	-	200,215
Claims and other expenses paid	(223,497)	-	-	(223,497)
Insurance acquisition cash flows	(24,911)	-	-	(24,911)
Total cash flows	(48,193)	-	-	(48,193)
Other movements	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	634,970	98,324	556,722	1,290,017
Insurance contract liabilities as at 31/12	635,321	98,227	556,562	1,290,111
Insurance contract assets as at 31/12	(351)	97	159	(94)
Net insurance contract (assets)/liabilities as at 31/12	634,970	98,324	556,722	1,290,016



31/12/2024

Life Risk & Savings - Insurance contracts issued	Estimates of the present value of future cash flows	Risk adjustment	Contractual service margin	Total
Insurance contract liabilities as at 01/01	916,397	67,705	380,007	1,364,108
Insurance contract assets as at 01/01	(251,278)	25,163	183,607	(42,508)
Net insurance contract (assets)/liabilities as at 01/01	665,119	92,868	563,614	1,321,601
Changes that relate to current service				
Contractual service margin recognised for services provided	-	-	(22,076)	(22,076)
Risk adjustment recognised for the risk expired	-	363	-	363
Experience adjustments	27,609	-	-	27,609
Changes that relate to future service				
Contracts initially recognised in the period	(6,601)	802	5,912	112
Changes in estimates that adjust the contractual service margin	(12,909)	5,605	7,304	-
Changes in estimates that do not adjust the contractual service margin	(3,290)	(1,289)	-	(4,579)
Changes that relate to past service				
Adjustments to liabilities for incurred claims	14,332	(2,485)	-	11,847
Insurance service result	19,141	2,996	(8,860)	13,277
Insurance finance expenses	14,263	-	3,976	18,239
Effect of movements in exchange rates	-	-	-	-
Total changes in the statement of profit or loss and OCI	33,404	2,996	(4,885)	31,516
Cash flows				
Premiums received	200,267	-	-	200,267
Claims and other expenses paid	(258,327)	-	-	(258,327)
Insurance acquisition cash flows	(27,427)	-	-	(27,427)
Total cash flows	(85,487)	-	-	(85,487)
Other movements	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	613,036	95,864	558,729	1,267,629
Insurance contract liabilities as at 31/12	865,478	68,371	366,697	1,300,545
Insurance contract assets as at 31/12	(252,442)	27,493	192,032	(32,916)
Net insurance contract (assets)/liabilities as at 31/12	613,035	95,864	558,729	1,267,629

Key changes that impact the income statement include the release of CSM for services provided, the release of risk adjustment for expired risks and the recognition of new onerous contracts (including any experience variances or assumption changes on onerous contracts).

CSM release is performed after the following changes that relate to future services:

- New contracts initially recognized in the year which give rise to a CSM liability representing unearned future profit on service yet to be provided:
- Experience variances and assumption changes on profitable contracts that impact the expected fulfilment cash flows and adjust the CSM liability



The table below presents a reconciliation of the net asset or liability for insurance contracts issued split by measurement component of estimates of the present value of future cash flows, risk adjustment and CSM for Participating portfolios:

31/12/2025				
Direct participating - Insurance contracts issued	Estimates of the present value of future cash flows	Risk adjustment	Contractual service margin	Total
Insurance contract liabilities as at 01/01	401,320	611	21,003	422,934
Insurance contract assets as at 01/01	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	401,320	611	21,003	422,934
Changes that relate to current service				
Contractual service margin recognised for services provided	-	-	(1,818)	(1,818)
Risk adjustment recognised for the risk expired	-	(26)	-	(26)
Experience adjustments	900	-	-	900
Changes that relate to future service				
Contracts initially recognised in the period	(5,315)	377	4,938	-
Changes in estimates that adjust the contractual service margin	(6,221)	(27)	6,248	-
Changes in estimates that do not adjust the contractual service margin	(3)	1	-	(2)
Changes that relate to past service				
Adjustments to liabilities for incurred claims	-	-	-	-
Insurance service result	(10,638)	324	9,368	(946)
Insurance finance expenses	23,835	-	-	23,835
Effect of movements in exchange rates	-	-	-	-
Total changes in the statement of profit or loss and OCI	13,197	324	9,368	22,889
Cash flows				
Premiums received	83,882	-	-	83,882
Claims and other expenses paid	(127,203)	-	-	(127,203)
Insurance acquisition cash flows	(8,581)	-	-	(8,581)
Total cash flows	(51,902)	-	-	(51,902)
Other movements	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	362,615	935	30,371	393,922
Insurance contract liabilities as at 31/12	362,615	935	30,371	393,922
Insurance contract assets as at 31/12	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	362,615	935	30,371	393,922



31/12/2024

Direct participating -
Insurance contracts issued

	Estimates of the present value of future cash flows	Risk adjustment	Contractual service margin	Total
Insurance contract liabilities as at 01/01	406,393	438	16,710	423,540
Insurance contract assets as at 01/01	-	-	-	-
Net insurance contract (assets)/liabilities as at 01/01	406,393	438	16,710	423,540
Changes that relate to current service				
Contractual service margin recognised for services provided	-	-	(1,187)	(1,187)
Risk adjustment recognised for the risk expired	-	(22)	-	(22)
Experience adjustments	(1,128)	-	-	(1,128)
Changes that relate to future service				
Contracts initially recognised in the period	(9,314)	419	8,895	-
Changes in estimates that adjust the contractual service margin	3,638	(223)	(3,415)	-
Changes in estimates that do not adjust the contractual service margin	97	-	-	97
Changes that relate to past service				
Adjustments to liabilities for incurred claims	916	-	-	916
Insurance service result	(5,791)	174	4,293	(1,324)
Insurance finance expenses	26,988	-	-	26,988
Effect of movements in exchange rates	-	-	-	-
Total changes in the statement of profit or loss and OCI	21,197	174	4,293	25,664
Cash flows				
Premiums received	145,204	-	-	145,204
Claims and other expenses paid	(164,513)	-	-	(164,513)
Insurance acquisition cash flows	(6,961)	-	-	(6,961)
Total cash flows	(26,270)	-	-	(26,270)
Other movements	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	401,320	611	21,003	422,935
Insurance contract liabilities as at 31/12	401,320	611	21,003	422,935
Insurance contract assets as at 31/12	-	-	-	-
Net insurance contract (assets)/liabilities as at 31/12	401,320	611	21,003	422,935



31.5 Expected recognition of the contractual service margin (CSM)

The following tables illustrate when the Company expects to recognize the remaining CSM in total comprehensive income.

31/12/2025	(€ thousands)							
Number of years until expected to be recognised	Less than 1 year	1-2 years	2-3 years	3-4 years	4-5 years	5-10 years	More than 10 years	Total
Insurance contracts issued								
Life Risk & Savings	24,839	23,751	23,666	22,704	21,803	95,724	344,234	556,721
Participating	2,282	2,435	2,574	2,704	2,828	11,359	6,188	30,371
Total	27,121	26,186	26,240	25,409	24,630	107,083	350,423	587,093
31/12/2024	(€ thousands)							
Number of years until expected to be recognised	Less than 1 year	1-2 years	2-3 years	3-4 years	4-5 years	5-10 years	More than 10 years	Total
Insurance contracts issued								
Life Risk & Savings	22,012	21,304	20,932	20,094	19,324	86,026	369,037	558,729
Participating	1,622	1,725	1,815	1,896	1,968	8,467	3,510	21,003
Total	23,634	23,029	22,747	21,990	21,293	94,493	372,547	579,733

31.6 Impacts on current period

The current period impact stemming from the transition approaches adopted in establishing CSM for Life Risk & Savings insurance contracts issued contracts held portfolios is disclosed in the table below:

31/12/2025	(€ thousands)			31/12/2024	(€ thousands)		
Life Risk & Savings	Contracts using the fair value approach	All other contracts	Total	Life Risk & Savings	Contracts using the fair value approach	All other contracts	Total
Contractual Service Margin as at 01/01	337,759	220,970	558,729	Contractual Service Margin as at 01/01	358,595	215,574	574,169
Changes that relate to current service				Changes that relate to current service			
- Contractual service margin recognised for services provided	(15,612)	(9,605)	(25,216)	- Contractual service margin recognised for services provided	(15,361)	(6,715)	(22,076)
Changes that relate to future service				Changes that relate to future service			
- Contracts initially recognised in the period	-	5,845	5,845	- Contracts initially recognised in the period	-	5,912	5,912
- Changes in estimates that adjust the contractual service margin	(24,243)	37,005	12,762	- Changes in estimates that adjust the contractual service margin	2,452	4,852	7,304
Insurance service result	(39,855)	33,245	(6,609)	Insurance service result	(12,909)	4,049	(8,860)
Insurance finance expenses	1,279	3,322	4,601	Insurance finance expenses	954	3,021	3,976
Effect of movements in exchange rates	-	-	-	Effect of movements in exchange rates	-	-	-
Total changes in the statement of profit or loss and OCI	(38,575)	36,568	(2,008)	Total changes in the statement of profit or loss and OCI	(11,955)	7,070	(4,885)
Other movements	-	-	-	Other movements	(8,881)	(1,674)	(10,555)
Contractual Service Margin as at 31/12	299,184	257,538	556,722	Contractual Service Margin as at 31/12	337,759	220,970	558,729



The impact on the current period resulting from the transition approach applied in establishing the contractual service margin for the Life & Savings portfolio of issued insurance contracts held at the transition date is presented below:

31/12/2025	(€ thousands)		
Participating	Contracts using the fair value approach	All other contracts	Total
Contractual Service Margin as at 01/01	-	21,004	21,004
Changes that relate to current service			
- Contractual service margin recognised for services provided	-	(1,818)	(1,818)
Changes that relate to future service			
- Contracts initially recognised in the period	-	4,938	4,938
- Changes in estimates that adjust the contractual service margin	-	6,248	6,248
Insurance service result	-	9,368	9,368
Insurance finance expenses	-	-	-
Effect of movements in exchange rates	-	-	-
Total changes in the statement of profit or loss and OCI	-	9,368	9,368
Other movements	-	-	-
Contractual Service Margin as at 31/12	-	30,372	30,372

31/12/2024	(€ thousands)		
Participating	Contracts using the fair value approach	All other contracts	Total
Contractual Service Margin as at 01/01	7,785	19,016	26,801
Changes that relate to current service			
- Contractual service margin recognised for services provided	-	(1,187)	(1,187)
Changes that relate to future service			
- Contracts initially recognised in the period	-	8,895	8,895
- Changes in estimates that adjust the contractual service margin	-	(3,415)	(3,415)
Insurance service result	-	4,293	4,293
Insurance finance expenses	-	-	-
Effect of movements in exchange rates	-	-	-
Total changes in the statement of profit or loss and OCI	-	4,293	4,293
Other movements	(7,785)	(2,305)	(10,090)
Contractual Service Margin as at 31/12	-	21,004	21,004



31.7 The components of new business - Insurance contracts issued and reinsurance contracts held

The components of new business for insurance contracts issued contracts held included in the Life Risk & Savings and Participating portfolios is disclosed in the table below:

31/12/2025	(€ thousands)		
Life Risk & Savings	Contracts issued		Total
	Non-Onerous	Onerous	
Insurance contract liabilities			
Estimate of present value of future cash outflows, excluding insurance acquisition cash flows	16,698	1,434	18,133
Estimates of insurance acquisition cash flows	3,725	183	3,909
Estimate of present value of future cash outflows	20,424	1,617	22,041
Estimates of present value of future cash inflows	(27,156)	(1,530)	(28,686)
Risk adjustment	887	20	907
CSM	5,845	-	5,845
Amount included in insurance contract liabilities for the period	-	108	108

31/12/2025	(€ thousands)		
Participating	Contracts issued		Total
	Non-Onerous	Onerous	
Insurance contract liabilities			
Estimate of present value of future cash outflows, excluding insurance acquisition cash flows	156,875	-	156,875
Estimates of insurance acquisition cash flows	9,270	-	9,270
Estimate of present value of future cash outflows	166,145	-	166,145
Estimates of present value of future cash inflows	(171,459)	-	(171,459)
Risk adjustment	377	-	377
CSM	4,938	-	4,938
Amount included in insurance contract liabilities for the period	-	-	-

31/12/2024	(€ thousands)		
Life Risk & Savings	Contracts issued		Total
	Non-Onerous	Onerous	
Insurance contract liabilities			
Estimate of present value of future cash outflows, excluding insurance acquisition cash flows	16,436	3,369	19,805
Estimates of insurance acquisition cash flows	3,824	592	4,416
Estimate of present value of future cash outflows	20,260	3,961	24,221
Estimates of present value of future cash inflows	(26,959)	(3,864)	(30,823)
Risk adjustment	787	15	802
CSM	5,912	-	5,912
Amount included in insurance contract liabilities for the period	-	112	112

31/12/2024	(€ thousands)		
Participating	Contracts issued		Total
	Non-Onerous	Onerous	
Insurance contract liabilities			
Estimate of present value of future cash outflows, excluding insurance acquisition cash flows	223,204	-	223,204
Estimates of insurance acquisition cash flows	8,698	-	8,698
Estimate of present value of future cash outflows	231,902	-	231,902
Estimates of present value of future cash inflows	(241,216)	-	(241,216)
Risk adjustment	419	-	419
CSM	8,895	-	8,895
Amount included in insurance contract liabilities for the period	-	-	-



Note 32: Employee Benefit Obligations

	31/12/2025	31/12/2024
	(€ thousands)	
Defined benefit plans of the Company	72,054	77,074
Retirement Indemnities	3,765	5,124
Subtotal	75,819	82,198
Defined contribution plans of the Company	19,247	17,443
Total employee benefits	95,066	99,641

The Company has the below Benefit plans for its employees:

Defined Benefit Plans

Closed Defined Benefit Plan

a) Employees who joined Ethniki before 2004, participate in this Defined Benefit Plan where both they and the Company make contributions. Upon retirement, each employee included in the plan, is entitled to receive a lump sum and a pension benefit, dependent on their salary and years of service; the employee may elect to receive a second lump sum in leu of the pension benefit.

Retirement Indemnities

b) Company employees in Greece receive a retirement indemnity in accordance with the prevailing legislation (Law 2112, 3026/1954, as modified by L.4093/2012, L.4336/2015, L.4194/2013 and L.4808/2021). Thus, an expense is recognized each year only for the employee's final 16 years of service. Consequently, the corresponding liability is built up over the 16-year period commencing from the year in which the obligation arises and not over the full years of service till retirement.

Risks associated with defined benefit plans are demographic risks such as longevity, disability, and death, as well as economic risks such as interest rates, inflation, and compensation increases. The Company manages these risks as described in detail in section 4 (Risk Management).

Defined Contribution Plans

Company employees hired after 2004, participate in a Defined Contribution Plan where both they and the Company make contributions. Upon retirement, each employee included in the plan, is entitled to receive a lump sum of the accumulated account balance or elect to receive a pension benefit calculated on the account balance using current assumptions:

Reconciliation of present value of obligation

Present value of obligations at beginning of period
Service cost
Interest cost
Employee contributions
DAF benefits
Indemnities paid by the Company
Increase due to termination of contracts with consensual processes and other
(Gain)/ Loss due to financial assumptions
(Gain)/ Loss due to demographic assumptions
(Gain)/ Loss due to experience adjustments
Present value of funded obligations at end of period

Reconciliation of amount recognized in other comprehensive income

Amount recognized in comprehensive income at beginning of period
Gain/ (Loss) due to changes in assumptions
Gain/ (Loss) due to experience adjustments
Total amount recognized in other comprehensive income during the period
Amount recognized in other comprehensive income at end of period

Key assumptions

Discount rate
Price inflation
Plan duration (years)

31/12/2025	31/12/2024
(€ thousands)	
82,198	83,950
950	1,107
2,408	2,586
185	239
(5,977)	(11,704)
(2,566)	(10,299)
1,177	12,258
(5,811)	1,304
1,273	1,115
1,983	1,642
75,819	82,198
(1,095)	2,967
4,538	(2,420)
(1,983)	(1,642)
2,555	(4,062)
1,460	(1,095)
3.61%	2.93%
2.00%	2.10%
10.84	10.59



The table below presents the sensitivity analysis to the present value of the accumulated liability, in a change of the basic valuation assumptions.

Sensitivity analysis of actuarial assumptions		
	L.4093	DAF
Discount rate	Increase by 50 bps	-2%
	Decrease by 50 bps	2%
Rate of compensation increase	Increase by 50 bps	3%
	Decrease by 50 bps	2%

Employer contributions to the closed defined benefit plan for 2026 are estimated at €530 thousands.

Note 33: Share Option Plan

The Extraordinary General Meeting (EGM) of the shareholders of Ethniki General Insurance Company S.A. (the 'Company') held on 9 February 2023, following a recommendation by the Company’s Remuneration and Nominations Committee (the ‘Committee’), approved the establishment of a Management Incentive Plan (the 'Plan'), commencing on 31 March 2022 and ending on 31 March 2032, in the form of options over the Company's shares in accordance with the provisions of article 113 of Greek law 4548/2018. The options were awarded to directors, senior managers and eligible employees of the Company. In addition, on the same date, the EGM designated the initial participants in the Plan and further authorised the Company's Board of Directors to implement the decisions of the Plan and in particular to (a) subsequently determine any additional eligible participants or categories thereof, other than the initial participants, in cooperation with the Committee, and (b) implement the approved terms and conditions of the Plan.

The purpose of the Plan is to encourage the long-term and general prosperity of the Company by achieving its strategic, financial and operating activities, as well as helping align the interests of the Participants with those of shareholders. The incentives that may be received by the participants pursuant to this Plan shall be considered in any event as extraordinary and one-off, thus their participation will not entail an acquired right to participate in future plans that may be established by the Company.

The Plan relates to the granting of incentives in the form of stock option rights for the acquisition of existing shares of the Company and constitutes variable remuneration in accordance with Law 4364/2016 and the Commission Delegated Regulation 2016/35. within the meaning of Article 32 of Law 4308/2014.

The total number of shares to be awarded under the Plan is up to and including 10% of the Company's total share capital, as reflected in the approval minutes of the Extraordinary General Meeting.

The shares will be awarded to eligible participants in accordance with article 49 of law 4548/2018. The shares of the Company to be awarded will be acquired by the Company. The option certificates will state a specific number of shares that can be acquired under the option per participant to the Stock option Plan. If the professional relationship between the Company and a participant ends for other than a 'good' reason, all of the shares awarded will be forfeited.

The Plan represents an equity-settled share-based arrangement under IFRS 2 *Share-based Payment*, with a grant date 14 February 2023, since on that date the participants became formally aware of the Plan through the adherence letter, which required each employee's explicit consent. The vesting period, however, commences on 1 August 2022, earlier than the date of the grant, owing to the fact that the beneficiaries became aware of their participation in the Plan on that date despite not being informed of the terms and conditions of the Plan.

The total option pool, being 10% of the Company's share capital, amounted to 19,601,748 shares. In February 2023, the Company granted 8,232,734 options to eligible employees representing 42% of the total option pool. There has been no movement in the number of share options during the year. The weighted average fair value of the share options on the date of the grant calculated by using the Black Scholes model was €1.33. The fair value amounts estimated on the date of the grant were determined by using the following assumptions:

Grant date	14 February 2023
Share price (€)	2.72
Exercise price (€)	1.52
Expected volatility	30%
Expected option life (years)	4.1
Risk-free interest rate	3.5%
Expected dividend yield	0.0%

The Plan is accounted for as equity-settled compensation plan. In accordance with the Group's accounting policy, the compensation costs for the options granted are recognised in net income over the plan's vesting period with a corresponding credit entry in equity reserves.

Cancellation of the Plan

Following the recommendation of the Bank of Greece, the Annual General Meeting of the Shareholders of Ethniki Holdings S.à.r.l., the sole shareholder of the Company, convened on 4 August 2025 and resolved to revoke the decision taken by the Extraordinary General Meeting on 9 February 2023, thereby approving the cancellation of the Plan, which is to be effected by the Board of Directors. As a result, all outstanding equity-settled based payment awards were cancelled without providing any compensation or replacement awards to the participants.

Under IFRS 2, the cancellation of the Plan will be accounted for as an acceleration of vesting. Consequently, any unamortised portion of the grant-date fair value of the cancelled awards will be recognised immediately in the income statement, representing the amount that would otherwise have been recognised over the remaining vesting period.

However, on the date of cancellation, the vast, majority of the participants ceased to provide any service, and by the end of the reporting period 31.12,2025, the services of **all participants** in the Plan were terminated. Accordingly, no further awards are to vest, and, thus, the Company is not required to recognise any additional compensation expense upon cancellation.

During the period, the Company also revised its estimates for forfeitures as a result of participants failing to meet the service conditions under the terms of the Plan. Consequently, the Company reversed the previously recognised cost of the forfeited awards to reflect the actual number of share options expected to vest. The reversal of expense amounted to €1.3 million and was recognised in the profit or loss for the period with the corresponding debit entry being made to ‘Share Option Reserve’.

Settlement of the Plan

In consequence of the above, the Company settled the share-based payment awards granted to the participants of the Plan through a transfer from one component of equity to another. The cumulative balance previously recognised in the ‘Share Option Plan Reserve’, representing the grant date fair value of services received, was reclassified within equity upon settlement. In particular, the Company transferred €4.9 million from the Share Option Plan Reserve to Retained Earnings. No cash consideration was paid at the settlement date.



Note 34: Related Party Disclosure

	31/12/2025				31/12/2024			
	(€ thousands)							
	Assets	Liabilities	Income	Expenses	Assets	Liabilities	Income	Expenses
Transactions with Subsidiary Companies								
Insurance operations	6	105	15	114	2	180	154	33
Transactions with Related Parties								
-Sight deposits	1,946	-	-	1	-	-	-	-
-Insurance operations	311	6	1,897	10	242	-	2,295	7
-Other transactions	37.002	-	1,744	-	-	-	-	-
Transactions with Key Management Personnel of the Company and related companies								
-Insurance operations	56	179	52	56	3	301	28	115
Total	39.321	290	3,707	181	247	481	2,477	155

a. Transactions with related parties:

All transactions with related parties were conducted within the ordinary course of business and under terms equivalent to those granted to third parties.

On 26 November 2025, the transfer of all shares of the Company from CVC Capital Partners Fund VII to Piraeus Financial Holdings S.A. was completed. On 19 December 2025, the Bank announced that, following the announcement of the registration of the decision of the Ministry of Development in the General Commercial Registry (“GEMI”) as well as the approval by the competent supervisory authority, namely the ECB (acting through the SSM), the merger by absorption of “Piraeus Financial Holdings” by Piraeus Bank was completed. As a result of this transition, the transactions with related parties presented in this note include both transactions with entities that belonged to the structure of the previous Group, for the period up to the completion of the transaction, as well as transactions with entities of the new Group for the period from that date onwards.

b. Transactions with key management personnel of the Company and related entities:

All transactions with related parties were carried out within the ordinary course of business and under terms equivalent to those granted to third parties or those agreed in employment contracts.

Members of the Board of Directors and the Executive Committee, General Managers, Deputy General Managers of the Company, key management of other related entities, as well as close family members or companies controlled individually or jointly by these persons, conducted transactions with the Company in the context of its normal operating activities.

A list of the members of the Company's Board of Directors is provided in Note 1 “General Information”.

	31/12/2025	31/12/2024
	(€ thousands)	
Benefits of Key Management Personnel (KMP):		
- Short-term benefits	3,631	2,645
- Post-employment benefits	78	63
-Termination benefits	1,068	1,036
	4,778	3,744

” Short-term benefits” include salaries, fees, employer contributions and other benefits.

The provision for retirement indemnities amounts to €31 thousand (2024: €52 thousand). The Company has neither granted nor received any guarantees or commitments of any kind relating to related parties.

As at 31 December 2025, as well as at 31 December 2024, the Company had not recognised any provision for doubtful debts relating to amounts owed by related parties, as no such risk existed.

Note 35: Contingent Liabilities

Legal proceedings

The Company is involved (in its capacity as defendant and plaintiff) in various litigation cases and arbitration proceedings arising in the course of its business activities. Management, as well as the Company's legal advisors, estimate that all pending cases are expected to be resolved without a material adverse impact on the Company's financial position or its operating results.

The Company has been informed by its legal advisors that it is possible, but not probable, that certain legal cases—primarily relating to a claim for breach of a court decision—may have an unfavorable outcome. No provision has been recorded for these specific cases as of 31 December 2025. The potential obligation that could arise from these matters, based on the current status of the judicial process and Management's best estimate, is not expected to exceed €3.2 million, while the timing of any outflow remains uncertain.

Pending tax audits

The fiscal years 2011–2016 were audited by Deloitte Certified Public Accountants S.A. in accordance with Article 82 of Law 2238/1994 and subsequently Article 65a of Law 4174/2013. The related tax compliance reports, which contained no qualifications, were issued on 27 July 2012, 24 September 2013, 9 July 2014, 29 September 2015, 30 September 2016 and 26 October 2017 respectively.

The fiscal years 2017–2024 were audited by PricewaterhouseCoopers S.A. (“PwC”), and the corresponding tax compliance reports, all of which were unqualified, were issued on 31 October 2018, 29 October 2019, 23 October 2020, 22 October 2021, 26 October 2022, 9 November 2023, 19 November 2024 and 1 October 2025 respectively.



Deloitte Certified Public Accountants S.A. (“Deloitte”) is currently conducting the tax audit for the fiscal year 2025. The final outcome of the tax compliance report is not expected to have a material impact on the Company’s financial position.

The unaudited tax years of the Company and its subsidiaries are presented in Note 11. Their tax obligations for those fiscal years cannot be considered final. Additional taxes and penalties may be imposed as a result of future tax audits of the unaudited fiscal years; however, no material impact on the Company’s financial position is expected.

Note 36: Post Balance Sheet Events

The Company has reviewed the events that occurred after the balance sheet date, in accordance with the provisions of International Accounting Standard IAS 10 “Events after the Reporting Period”.

During the period between the balance sheet date and the date of approval of the financial statements, no adjusting events have arisen that provide additional information regarding conditions that existed at the balance sheet date and, therefore, would require the amounts recognized in the financial statements to be adjusted.

The Company’s Management continuously monitors developments in the international geopolitical environment, assessing their potential impact, and up to the date of approval of the financial statements, no events have been identified that would constitute a material adverse effect on the Company’s financial position, results or cash flows.

Note 37: Audit Fees

The audit firm ‘Deloitte Certified Public Accountants S.A.’ (‘Deloitte’) was the statutory independent auditor for the financial year ended 31 December 2025. For the financial year ended 31 December 2024, the statutory independent auditor was the audit firm ‘Price Waterhouse Coopers Audit S.A.’ (‘PwC’).

The table below presents the total fees for audit and other professional services provided to the Company by the aforementioned audit firms, their related entities, as well as their respective affiliates.

	31/12/2025	31/12/2024
	(€ thousands)	
Audit of statutory financial statements	470	596
Audit-related services	323	558
Other non audit services	-	48
Total independent auditor's fees	793	1,202

Note 38: Restatements & Reclassifications

The reclassifications reflected in the accounts of the table below were made in the context of achieving a more relevant presentation and ensuring the comparability of the financial statements, and had no impact on total equity or the results for the period.

Specifically, they relate to the reclassification from “Other receivables” of accrued interest income from debt securities, loans and term deposits to the respective line items within “Financial assets” and “Cash and cash equivalents”, in order to align the presentation with the nature of the related financial instruments and the method of recognizing accrued interest in accordance with the requirements of IFRS 9 and the related disclosures of IFRS 7.

	31/12/2024 Published	Reclassifications	31/12/2024 Reclassified amounts
	(€ thousands)		
Financial assets	3,343,109	27,113	3,370,222
Other receivables	44,573	(27,147)	17,426
Cash and cash equivalents	29,816	35	29,851
Total	3,417,498	-	3,417,498





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