ETHNIKI
FIRST IN INSURANCE

Annual Financial Report

For the year ended 31 December 2022

May 2023

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.

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Statement of the Chairman of the Board

Andrzej Piotr Klesyk
Chairman of the Board of Directors

The business environment in 2022, both in Greece and worldwide, was characterized by increased uncertainty and inflationary pressure. Based on the latest economic forecast, the high inflation observed in 2022 is expected to decelerate, followed by a lower GDP growth in the coming years, and the volatility of our business environment is projected to persist in the near future.

The main challenge for the insurance sector in 2023 will be the absorption of higher claims costs and the active management of loss ratios, in a post-covid, « back to normal », world, as well as the containment of operating expenses in an inflationary environment. Through new product design and the enhancement of the insurance covers offered, the insurance sector should play an active role in matching increased customer needs for protection and peace of mind. The economic deceleration is a major risk for the insurance industry, while at the same time opportunities should arise from higher demand for insurance products related to catastrophe events (e.g. property), cyber-risk coverage, hospitalization benefits and the coverage of uncertainty for loss of income. Thus, the demand for insurance and investment products is expected to grow further, since the penetration of insurance as a percentage of GDP is still relatively low, especially in Greece, with a material upside potential.

The Company's transformation strategy is focused on digital acceleration and embracing new technologies to support a new value proposition for the customers through more holistic solution driven offers. In addition, emphasis is placed on the adoption of ESG criteria affecting the investment decision making processes, environmental protection, governance policies, and risk management, to engage the company in a truly sustainable development path.

Forward looking, the Company's main objectives are to manage growth and transformation in a full ambidexterity manner, by focusing on:

- Enhancing its technical results and containing the operating cost pressure through improved operating efficiency and technical excellence.
- Upgrading the value proposition offered in the Health and Life businesses thanks to innovative protection and savings offers that will match new customer needs through an ecosystem approach.
- Investing in new technologies and strategic transformation levers for simplified and more «easy-to-deal-with» digital processes and operations.
- Engaging in a deep cultural transition towards a more agile and entrepreneurial model, onboarding employees into one of the best employer brands and providing them with the best opportunities for development in an attractive working environment.
- Developing the environmental consciousness and solidity by achieving our ESG ambition to be fully embedded into the new company's DNA.
- Achieving efficient capital management, by maintaining sufficient solvency capital and maximizing the value of the company for all the stakeholders.

In 2022, there was a change in the helm of Ethniki. Stavros Konstantas, a long standing CEO at Ethniki who has played a key role in the success of the company, embarking it into the new era of its history, has decided to accept a new challenge of becoming the Head of the Department of the Private Insurance Supervision at Bank of Greece.

Robert Gauci, who was previously holding leading positions in large multinational Insurance Groups in Central and Eastern Europe and before in Western Europe, has been appointed as the new CEO of the company as of 02.01.2023, accepting the responsibility to lead Ethniki into the next chapter of its development and transformation.

Statement of the Chief Executive Officer

***Robert Gauci** | Chief Executive Officer*

During 2022, Ethniki Insurance, despite the market volatility and the inflationary pressure, achieved its goals with a robust intrinsic business profitability and healthy production results, maintaining both a strong presence in the Greek Insurance Market with a market share of 13.6% based on gross written premiums, and a strong capital base. More specifically, in some of the most strategic market segments such as Health where the company has taken a strong commitment to play an even more active role for the customers and the society, it holds a market share of close to 25%.

The Company confirmed its operating profitability, with a profit before tax in 2022 amounting to €41.9 million in 2022[1], while Gross Written Premiums reached €655.9 million. These results were achieved despite the material investment into the company's transformation roadmap with significant costs incurred for supporting its strategic project portfolio.

Specifically, in the Life business, the profit before tax reached €29.2 million and gross written premiums amounted to €479.0 million, while in the Non-Life business, the Profit before tax reached €12.7 million and gross written premiums amounted to €176.9 million.

The Company maintained a strong capital base, with its Solvency Capital Requirement (SCR) ratio reaching 225% on 31.12.2022, with use of transitional measures. The Company covers fully the Solvency Capital Requirements even without making use of the transitional measure on technical provisions, with a SCR ratio reaching 187% (31.12.2021: 184%).

The financial year 2022 confirmed the robust base of Ethniki's core business to support the ambitious transformation program of the company for repositioning its Value Proposition to match the existing and emerging needs of the society. We have achieved tangible and measurable results and were fully present when the society needed us. The world went through crises, challenges, the pandemic, an international war and an energy crisis which have imposed great stress on the economies worldwide, through which we gained significant experience on how to transform and redefine what we stand for and how to deploy our strategies in our new world.

We now have a clear roadmap in front of us, in order to offer new products to cover the future trends of the customer needs through innovative solutions and simplified processes as one of the main company's strategic guidelines. Technology and Data will be strong enablers to support the company's strategic transformation and to establish a more efficient and effective operating model. The current year finds us fully ready to meet our new challenges consistently with our clients' needs.

In 2022 the company became a member of the strong and large CVC family, which has set the bar even higher in our ambition horizon, opening new prospects, and leading us into a new direction through accelerated transformation and material appetite for investing even more in making Ethniki a better company thanks to its people, its technology and a culture of innovation to enhance its value proposition to the market and to the whole society.

[1] excluding impairment of subsidiaries amounting to €9.7 million.

2022

Board of Directors Report

On consolidated financial statements as of 31 December 2022

Main Achievements and major developments in 2022

Awards

- *Bronze award" for the effective implementation of Corporate Responsibility and Sustainable Development practices, within the context of the "CR Index 2021-2022" evaluation procedures*
- *Product of the Year 2022" for FULL [Life Plan], an insurance-investment product, by Direction Business Network*
- *Awarded by the Olympic Museum of Thessaloniki for its contribution to the spread of Olympism*

Financial support

- *Reinforced charitable institutions and organizations with the aim of supporting society and the economy*
- *Reinforced institutions and organizations in the field of education, health and science as well as actions that promote environmental awareness*
- *Supported Greek athletes for the promotion of the athletic spirit and fair play»*

Growth

- *Despite market fluctuations and inflationary pressures, the Company achieved its goals by achieving significant profitability and high production results*
- *The Company is focused on digital transformation and the adoption of technological innovations, with the aim of achieving its strategic goals and maintaining its strong presence in the insurance market*

Responsible environmental policy

- *A strategic priority is the reduction of environmental impact and continuous improvement in environmental management*

Financial Overview

Operating profit commentary

Group and Company

“THE ETHNIKI” Hellenic General Insurance S.A. Company and its subsidiaries (the "Group") are active in Greece, Cyprus and Romania. In 2022 the Group maintained its profitability remaining a financially sound and robust beacon of stability for its policyholders.

The profit before tax of the Parent Company for 2022 amounted to €41.9 million in 2022 (excl. impairment of subsidiaries amounting to €9.7 million), despite the necessary expenses incurred for the transformation of the Company, compared to €90.5 million in 2021 (excl. Voluntary Exit Scheme - “VES” cost amounting to €21.2 million). The Parent Company’s gross written premiums for 2022 amounted to €655.9 million (2021: €689.6 million), including gross written premiums of investment products amounting to €81.8 million (2021: €141.6 million), decreased by 4.9% compared to 2021 due to the fact that the new Unit-Linked product has not fully replaced the production of the old traditional product. Out of the total gross written premiums for 2021, an amount of €479.0 million is attributed to Life business (2021: €518.6 million) and €176.9 million to Non-life business (2021: €171.0 million).

The Group profit before tax for 2022 amounted to €32.5 million in 2022 (excl. impairment of subsidiaries amounting to €11.4 million) compared to €90.4 million in 2021 (excl. VES cost amounting to €21.2 million). The Group’s Gross written premiums for 2022 amount to €702.4 million (2021: €733.5 million), including gross written premiums of investment products amounting to €81.8 million (2021: €141.6 million), decreased by 4.2% compared to 2021, due to the fact that the new Unit-Linked product has not fully replaced the production of the old traditional product. Out of the total gross written premiums of 2022, an amount of €495.6 million is attributed to the Life business (2021: €534.3 million) whereas €206.8 million to the Non-life business (2021: €199.2 million).

Life business

The consolidated operating profit before tax for the Life business segment amounted to €23.1 million compared to €57.3 million in 2021.

With respect to the Parent Company, profit before tax for the life segment amounted to €29.2 million in 2022, compared to €57.4 million in 2021. Gross written premiums for Individual Life, and Unit Linked contracts (excluding investment contracts) were higher in 2022 compared to 2021, amounting to €322.9 million in 2022 compared to €309.1 million in 2021; Group Life contract gross written premiums (excluding Deposit Administration Funds "DAF" & Ethniki Efapax contracts) amounted to €74.3 million in 2022 compared to €67.9 million in 2021. Total Bancassurance gross written premiums for the Life segment in 2022 reached €98.0 million compared to €155.7 in 2021, decreased by 37.1% due to fact that the new Unit-Linked product has not fully replaced the production of the old traditional product. Gross written premiums of Investment contracts amounted to €81.8 million, compared to €141.6 million in 2021, mainly due to the discontinued of guarantee products during the first half of 2021.

Non-Life business

The Non-Life business segments continued to be profitable in 2021 with operating profit before tax reaching €9.3 million in 2022 compared to €33.0 million in 2021, a decrease which is attributed to all Segments of Non-Life business.

With respect to the Parent Company, profit before tax for Non-Life amounted to €12.8 million in 2022 compared to €33.2 million in 2021. Gross written premiums of the Non-Life Segment increased to €176.9 million in 2022 compared to €171.0 million in 2021.

Regarding the Parent Company, profit before tax for the Motor Segment, amounted to €4.0 million compared to €16.0 million in 2021 due to increase in the loss ratio since vehicle circulation reverted to more normal levels as Covid-19 restrictions were lifted. Gross written premiums of the Motor Segment decreased in 2022, reaching €67.9 million in 2022 compared to €70.3 million in 2021, due to lower average premium and fleet.

With regards to the Fire Segment, profit before tax for 2022 amounted to €10.6 million compared to €15.5 million in 2021. Gross written premiums of the Fire Segment increased in 2022, reaching €72.4 million in 2022 compared to €66.6 million in 2021, mainly due to the industrial portfolio.

As for the Other Non-Life Sectors, the result before tax amounted to a loss of (€1.8) million compared to a profit of €1,6 million in 2021. Gross written premiums of the Other Non-Life Segment increased to €36.6 million in 2022 compared to €34.2 million in 2021 mainly stemming from the All Risks business.

Operating expenses

Total General and Administrative expenses reached €112.1 million for 2022 vs €114.9 million in 2021, lower by €2.8 million on Group Level and €101.2 million in 2022 vs €105.0 million in 2021, lower by €3.8 million on a Parent Company level.

It is noted that year 2021 was burdened with €21.2 million due to the VES program, whereas year 2022 was burdened with consulting fees related to digitalization and operational transformation projects of the Company. This increase is depicted in caption "Third party fees" that is increased by €17.7 million vs prior year.

Balance sheet items

Assets under management

On 31 of December 2022, the Market Value of Assets under Management, including bonds, stocks, mutual funds, cash and real estate, including Unit Linked assets, reached at €3,369.4 million on a consolidated basis, versus €4,075.3 million in 2021. On the Parent Company level, the Market Value of Assets under Management on the 31 of December 2022 and 2020, reached €3,322.1 million and €4,023.8 million respectively Cash and cash equivalents on Group level reached €75.3 million in 2022 versus €88.7 million in 2021.

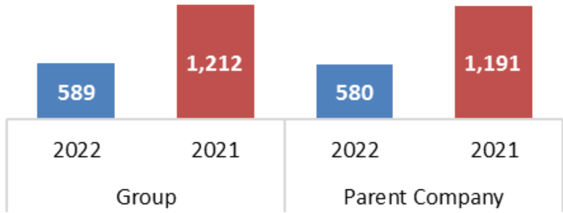
The asset allocation of the investment portfolio for the Parent Company, excluding Unit Linked assets, was as follows on 31 December 2022: 1.5% (2021: 1.2%) in equities mainly listed in FTSE Large Cap and in private equity funds whereas 16.2% (2021: 12.5%) was allocated in mutual funds. The bond portfolio reached 77.1% (2021: 81.8%) of total Assets under Management, amounting to €2,072.1 million (2021: €2,772.4 million), and comprised mainly of government bonds, of which €119.1 million were Greek government bonds (2021: €645.1 million) and €122.5 million (2021: €433.3 million) Greek government T-Bills with 6-month and 1-year tenor. The weighted average portfolio duration for the Parent Company was 7.41 years (2021: approximately 8.3 years).

On the 31 December 2022, the Unit Linked assets of the Parent Company reached €583.1 million (2022: €577.0 million), comprising mainly of bonds with 13.0% weight (2021: 14.8%), mutual funds with 30.0% weight (2021: 27.5%), and term deposits with 55.0% weight (2021: 56.5%) placed in euro currency vehicles with 100% capital and return guaranteed at maturity (Efapax products), whereas 1.0% was allocated to other deposits (2021: 1.1%).

Equity

As at 31 December 2022, total equity at a Group level amounted €588.9 million decreased by €622.8 million compared to 31 December 2021. This decrease is due to valuation losses of €531.7 million on financial assets classified as Available-For-Sale (AFS), due to tax amounting to €27.5 million and finally due to dividend distribution of €91.7 million (after tax) from Ethniki Insurance company to Ethiniki Holdings Sarl. The above movements were partially offset by profit before tax of €21.1 million in 2022.

The revaluation losses of the AFS portfolio were mainly due to the increase of the risk free interest rate curve by 259 b.p.



Up until the first quarter of 2022, the Parent Company was a subsidiary of National Bank of Greece (“NBG”), who owned 100% of its shares.

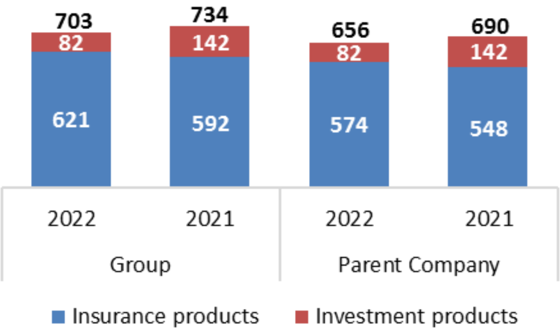
On 31 March 2022, NBG proceeded to the disinvestment of 90.01% of the Parent company’s share capital to CVC Capital Partners’ Fund VII ("CVC”). The transaction included the sale and transfer of 100% of the shares of the Parent company to the newly founded subsidiary of CVC Ethniki Holdings S.à.r.l, and the purchase of 9.99% of its share capital by NBG.

The above transaction followed the approval of the European Commission on February 25, 2022, as well as the approval of the supervisory authorities of the countries in which the Company and its subsidiaries operate.

Following the above, on 31 December 2022, the Parent Company is a subsidiary of Ethniki Holdings S.à.r.l based in Luxembourg, which owns 100% of its shares. Consequently, these Financial Statements will be included in the consolidated financial statements of the Ethniki Holdings S.à.r.l. Group using the full consolidation method. The Parent company as well as its subsidiaries, did not hold NBG shares as at 31 December 2022.

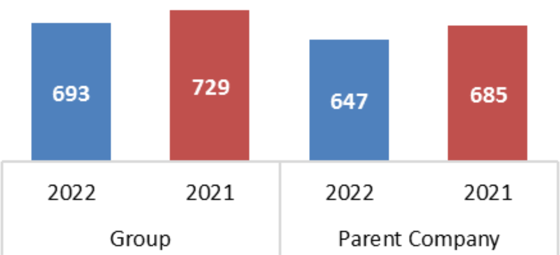
Key financial figures 2022-2021

Gross written premiums

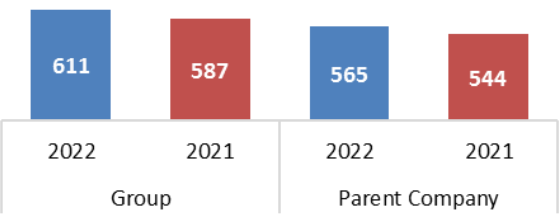


GWP of investment products is not recognized as income according to the provisions of IFRS 4.

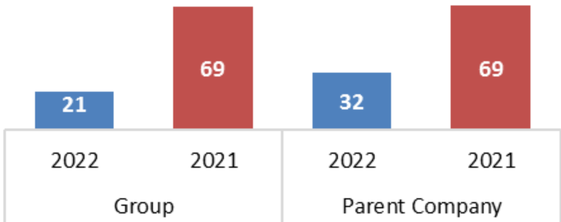
Gross earned premiums & related income (incl. Investment contracts)



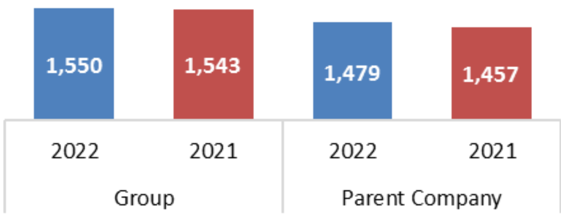
Gross earned premiums & related income



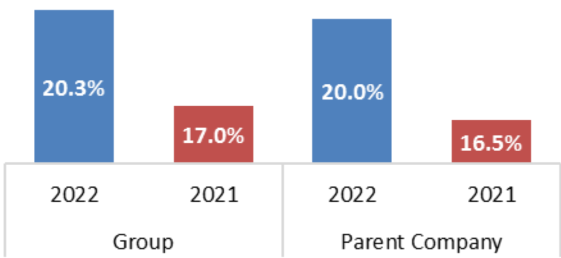
Profit, before tax



Insurance reserves



Expense ratio (on written premiums)



Economic environment

The business environment both in Greece and worldwide, was characterized by increased uncertainty, which is reinforced by geopolitical instability. Lately, the Covid-19 pandemic has been in relative remission.

The increase in oil prices and in other products, observed since 2021, has intensified after the outbreak of the Russian-Ukrainian crisis and has driven inflation to high levels. This resulted in restrictive monetary policy measures and a rise in interest rates. Inflation gradually increased, but the measures taken to contain it seem to be effective so far, as an overall de-escalation has been observed lately, both in Europe and in Greece.

As a consequence of the above, the low-interest rate trend previously observed has been reversed. In 2022, the European Central Bank (ECB) proceeded with 4 increases in its key interest rates. Indicatively, the refinancing interest rate stands at 3.5%, after a March 2023 increase, versus 0% at the beginning of 2022. The average interest rate for the first 30 years of the risk-free interest rate curve increased from 0.35% at the end of 2021 to 2.9% at the end of 2022, thus lessening the pressure on the insurers' insurance portfolios, especially on their Life products portfolios with high guaranteed interest rates. In order to assess the overall impact, the impact of the rise in bond yields on the insurers' existing investment portfolios should also be considered.

Especially for Greece, the growth observed in 2021 continued in 2022, albeit at a slower pace. According to the latest European Commission forecasts, the rate of the GDP change for 2022 is estimated at 5.5%, while a slower growth pace is expected in the coming years (Source: European Commission Forecasts, February 2023). At the same time, the unemployment rate dropped from 12.9% at the end of 2021 to 11.6% at the end of 2022 (Source: Eurostat).

Climate change, its intensity and extent, have a significant impact on shaping the business environment. Its consequences in terms of natural disasters (drought, floods, wildfires, etc.), differ from country to country and represent a challenge for insurers, as they may be requested to pay higher compensation, but may also lead to increased demand for related insurance products and the need to design new ones. The need to reverse climate change and the placement of the relevant issue high on the agenda of sovereign states and supranational bodies, are expected to lead to new consumer behaviors, new investment behaviors and changes in entire industry sectors. The European Union is developing actions, as in the context of the "NextGenerationEU" plan, to make Europe "climate neutral" by 2050. At the same time, developments in the field of medicine are expected to lead to an increase in life expectancy and medical acts cost, especially in developed countries.

Digital transformation of economies and businesses is accelerating, also supported by actions such as the "NextGenerationEU" plan and the "Greece 2.0" plan, and, along with it, the number of electronic transactions is increasing as well. This fact, in addition to opportunities, also poses risks to businesses, since they could deal with an increased cybercrime risk. At the same time, these threats may lead to an increased demand for relevant insurance coverage.

All the above results in a highly uncertain business environment, which offers opportunities but also poses significant risks.

Events after the reporting period

Voluntary Exit Scheme (VES) Program

The Board of Directors of the Company, in its meeting on 4 April 2023, approved a Voluntary Exit Scheme for the employees and salaried lawyers of the Company, provided that they have a minimum of 30 years of age and at least 7 full years of service in the Company. The deadline for submitting applications for participation in the VES was 5 May 2023 with an estimated cost of €5.2 million.

The VES will offer development opportunities for the remaining personnel and further enhance the competitiveness of the Parent Company through the rationalization of its cost base.

Exposure to the International Banking Sector

The Company has zero direct exposure to SVB or Credit Suisse instruments either through money market, bonds or equity financial instruments and continues to monitor the impact from further banking stresses on the sector and on the wider economy as well.

Total banking sector exposure as a percentage of the total portfolio remains small. While the Company maintains some global banking exposure, this is allocated to large systemic banks, which have high liquidity ratios and are well capitalized, reducing the risk of any adverse impacts.

Going concern

In preparing the financial statements for the period ending on 31.12.2022, the going concern basis was adopted. The Board has considered the following factors:

o the recurring profitability both of the group and the Parent Company

o the maintenance of the Solvency Capital Requirement ratio, even without the use of transitional measures, much higher than the 100% threshold

o the extensive and continuous fiscal and monetary support of the European and Greek authorities in response to the unprecedented COVID-19 crisis in 2020 and 2021 and

o the activation of new fiscal measures in response to pressures from increased inflation,

the Board has a reasonable expectation that the Group will be able to continue in operation for the next 12 months, and it therefore continues to adopt the going concern basis in preparing the financial statements.

Change of shareholder composition of the Company

On March 31, 2022, the NBG completed the divestment of 90.01% of the Company's share capital in CVC Capital Partners 'Fund VII (" CVC "). The transaction includes the sale and transfer of all the shares of the Company from NBG to the newly established subsidiary of CVC: Ethniki Holdings S.à.r.l, and the purchase by the NBG of 9.99% in the share capital of Ethniki Holdings S.à.r.l.

The above transfer followed the approval of the European Commission on February 25, 2022, as well as the supervisory authorities of the countries in which the Company operates and its subsidiaries.

Distribution channels

Parent Company

The Parent Company conducts its business in Greece through 134 sales offices, 1,693 insurance agents and 1,264 insurance brokers. The network is supported by 11 branches located in Athens, Agrinio, Heraklion, Thessaloniki, Kavala, Corinth, Lamia, Larisa, Patras, Rhodes and Chania. Ethniki Insurance's products are also available via the extensive network of NBG Branches, as well as through direct selling.

Ethniki Insurance (Cyprus) Ltd.

The Operating Profit before tax for Ethniki Cyprus was amounted to a loss (€6.5) million in 2022, compared to profit €2.2 million in 2021. Profitability decreased compared to the prior year primarily due to decrease in valuation of the investment portfolio.

The entity covers all Insurance Lines of Business. The sales network comprises of 7 branches and 2 Agency offices located across all major cities in (Nicosia, Limassol, Larnaca, Paphos and Ammochostos), 127 insurance agents and 49 insurance brokers.

Garanta Asigurari S.A. (Romania)

The Operating Profit before tax for Garanta S.A was a loss of (€2.8) million in 2022 compared to loss of (€2.3) million in 2021.

Garanta S.A. underwrites direct & indirect insurance coverages and covers all Insurance Lines of Business. It has in total 12 branches in the following cities: Bucharest (2), Bacau, Craiova, Constanta, Deva, Galati, Iasi, Pitesti, Ploiesti, Oradea και Timisoara. The sales network includes 140 agents, 4 insurance consultants, whereas insurance products are also sold via Eximbank (former Banca Romaneasca), Alpha Bank Romania και First Bank Romania.

As at 31.12.2021, the Parent Company held a shareholding parentage of 94.96% in Garanta Asigurari, the Group's company in Romania. During 2022, the

Parent Company increased its share by participating in two capital increases of €1.0 million and €2,1 million resulting in it having 96.7% share in Garanta as at 31.12.2022. During the last quarter of 2022, the parent Company considered the divestment from the said subsidiary, and, as a result, management has committed to a plan to sell the company. As a consequence of this, the investment in Garanta has been classified as a held-for-sale asset and an impairment loss of €9.7 million at a Parent Company level and €11.4 million at a Group level has been recognised, effectively reducing its value to zero.

Risk Management

Risk management framework

The Group by acknowledging its risk exposure and the necessity of its effective management it has developed a risk management system, supported by the appropriate organizational framework, in order to avoid and/or reduce potential losses. The Risk Management Framework at 31.12.2022 complies with existing regulatory requirements.

The system and the organizational risk management framework are summarized in the following elements:

- the Board of Directors ("BoD"), identifies the disposition for risk taking and the overall levels of risk tolerance and approves the Strategy and related Risk Management Policies,

- the Risk Management Committee, supports the BoD in the establishment and operation of the risk management framework. The Committee oversees and provides guidance for the effective implementation of the risk management system,

- the Risk Management Department, supports Management to establish an adequate risk management system and evaluate its effective operation. It monitors any risks involved in relation to risk-taking and submits all relevant reports to the Risk Management Committee and to the BoD,

- the Risk & Capital Management Strategy, wherein the aims of the system are set as well as the risk management principles, the disposition for risk-taking and the roles of those involved in the system,

- the Risk Management Policies, wherein the roles and responsibilities of those involved in the proper management of individual risk are set,

- the risk & reporting management process, as derived from all related Policies and as integrated in the administrative procedures and decision-making,

- the identification, evaluation, management and monitoring of risks, involving all related parties in the Unit risk management and which result in the development and systematic update of a Risk Register,

- the Own Risk and Solvency Assessment process ("ORSA") by identifying and evaluating all significant existing, and emerging risks stemming from the Group business plan and the operating environment of the Group, in order to assess the solvency of the Group on an ongoing basis.

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

Insurance Risk

Insurance risk relates to underwriting insurance risk, as well as to the provision of insurance reserves. 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 and reinsurance contracts, as well as internal rules of operation embedded in an integrated risk management framework. Moreover, pricing contracts are based on assumptions and statistical surveys, but also on the Group’s empirical data, taking into account prevailing market conditions and trends.

Credit Risk

Credit risk is defined as the risk of loss, or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of financial instruments, as well as the chance that counterparties and any debtors to which the Group is exposed, will be unable to meet their obligations, either as a risk of non-performance or counterparty default risk, or as a lack of compliance by the contractor.

The main counterparties to which the Group 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 partners of the Group.

The Group's policy is to enter into transactions which fulfil high standards and are based on a high level of creditworthiness.

Liquidity Risk

Liquidity risk is defined as the profit and capital risk resulting from the inability of the Group to fulfil its obligations when they fall due, or to fulfil them at a non-reasonable cost.

The Group manages liquidity risk by monitoring cash flows on an ongoing basis. It calculates and monitors the expected cash flows and takes the appropriate measures to maintain an adequate level of available cash balances.

Market Risk

Market risk is defined as the risk of loss, or of adverse change in the financial condition of the Group, resulting, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets or liabilities.

The Group applies techniques to measure market risk, such as Value-at-Risk measurement (“VaR”), sensitivity analyses and interest rate risk analysis. It also monitors the risk that may incur from inadequate matching of insurance liabilities and assets.

Concentration Risk

Concentration risk is defined as the profit and capital risk resulting from the low dispersion, i.e. from the significant concentration, either of assets or insurance liabilities, in specific assets or liabilities, such as the financial sector, the branch of activity, the geographical area, the counterparty or groups of connected counterparties, etc.

The Group manages concentration risk by the diversification of the insurance contract portfolio and investments, as well as by an appropriate reinsurance program.

Operational Risk

Operational risk is defined as the risk of loss arising from inadequate or failed internal processes, relating to information technology and other operating systems, personnel, or from adverse external events.

The sub-categories of operational risk framework which are examined, are the following: Compliance Risk, Conduct Risk, Information and Communication Technology Risk, Model Risk, Physical and Personal Security Risk, Outsourcing Risk and Legal Risk.

To reduce operational risk, the Group has developed adequate control and reporting procedures to detect, assess, manage and record operational risk. When the effect of operational risk is significant for the Group according to its disposition for risk-taking, action plans are developed to minimize operational risk and their implementation is being monitored. The control framework applied by the Group, is improved on a constant and ongoing basis.

Other Risks

The Group, besides the aforementioned risks, has recognized and adopted risk management processes for the following risks:

- Reputation risk
- Country risk
- Sustainability (ESG) risk

Non-financial information

According to Law 4548/2018, a section on Non-Financial statement issues is included in the Financial Report, in order to explain the evolution, the KPIs, the position and impact from various related activities.

Moreover, (re)insurance companies disclose information that is required according to article 8 of EC Regulation 2020/852 as defined in appendixes X and XI of Delegated Acts (EC) 2021/2178 of European Commission.

Based on the required disclosures from above regulations, this chapter includes the following sections:

Sustainable development goals,

Environmental issues,

Social and labor issues,

Respect for human rights,

Fight against corruption and bribery issues,

Awards and Distinctions,

Presentation of initiatives of Corporate Social Responsibility during 2022,

Disclosures based on article 8 of taxonomy regulation.

As part of the implementation efforts to meet the disclosure requirements for Non-Financial information, the Parent Company took into account international practice and related standards, i.e. OECD instructions for multinational corporations (2011).

The Company has already published four Social & Corporate Responsibility reports (years 2018-2021) with aim to provide full and complete update of all interested parties around initiatives of Social & Corporate Responsibility of Ethniki Insurance, while the updated Report for year 2022 will be made available after the publishing of Annual IFRS Financial Statements 31.12.2022 and will be based on the standards for publishing Social & Corporate Responsibility reports of Global Reporting Initiative (GRI), and more specifically based on Standards version (In Accordance – Core) that is recognized as the most updated and most demanding worldwide.

Sustainable Development Goals

The Parent Company has adopted the Agenda of United Nations for 2030, as it is expressed by 17 Sustainable Development Goals for year 2030. Management has made a decision to contribute positively in meeting the goals set, through promotion of prosperity and security of the population, the protection of environment and fighting poverty. First priority is to achieve goals directly linked with activities and challenges for insurance sector, as well as with substantial issues:

UN Sustainable Development Goals	Substantial Issues	GRI Standards Indexes
Good health & prosperity	Employee health and safety	GRI 403-1,2,3,4,5,6,7,9
Qualitative education	Employee education and training	GRI 404-1,2,3
Gender equality	Being different	GRI 405-1, 406-1
	Avoidance of discrimination	
Decent work & economic development	Financial performance	GRI 201-1, 401-2, 402-1, 403-1,2,3,4,5,6,7,9, 404-1,2,3, 410-1
	Avoidance of discrimination	
	Employee education and training	
	Safety practices	
	Employee benefits	
	Management-Employee Communication	
Sustainable cities & communities	Support local society	GRI 413-1
Responsible consumption & production	Energy consumption	GRI 302-1,4, 305-1,2,3,4,6
	Climate change	
Climate action	Energy consumption	
	Climate change	
Peace, Justice & strong institutions	Data privacy	GRI 205-1,2,3, 206-1, 417-2,3, 418-1
	Fight against corruption	
	Anti-competitive behavior	
	Risk assessment procedures	
	Marketing & branding	

The table below presents specific goals of Social & Corporate Responsibility and Sustainable Development, based on which commitment is made and action is taken towards:

Goals 2021-2022	Progress	Goals 2023
Employees		
Maintain the existing voluntary activities within the possibilities shaped by the COVID-19 pandemic conditions	Ongoing	Maintain and enhance environmental activities
Keep and enhance online / digital training	Ongoing	Maintain and enhance online / digital training
Society		
Continue to assist vulnerable social groups.	Ongoing	Continue to assist vulnerable social groups
Continue to provide support to associations and organisations	Ongoing	Continue to provide support to associations and organisations.
Respond to emergencies.	Ongoing	Respond to emergencies
Environment		
Repetition of measurement of the carbon footprint of the main building complex	Completion and maintenance	Repetition of measurement of the carbon footprint of the main building complex. Expand Scope 3 measurements, establishing a greenhouse gas emission reduction strategy
Full digitization of documents by using a customized IT platform at each point of sale and their automatic routing to the headquarters to increase productivity and accelerate customer service without the need for printing	Program in progress	Completion of full digitization of documents by using a customized IT platform at each point of sale and their automatic routing to the headquarters to increase productivity and accelerate customer service without the need for printing
Completion of the replacement of light bulbs with LED bulbs in the company's buildings	Program in progress	Expansion of the measure to other buildings of Ethniki
Support environmental awareness- promoting actions	Ongoing	Support environmental awareness-promoting actions

Elimination of single-use plastics in the main building complex	Completed	Expansion of the measure to the other buildings of Ethniki
Market		
Support for private insurance organizations and associations	Ongoing	Support for private insurance organizations and associations
Supporting awareness-raising actions on corporate responsibility and Sustainable Development in our production networks	Ongoing	Supporting awareness-raising actions on corporate responsibility and Sustainable Development in our production networks
Corporate Responsibility		
Participate in the National Corporate Responsibility Index (CR Index) for 2022	Completion and maintenance	Participate in the National Corporate Responsibility Index (CR Index) for 2023
Support of informative actions on Corporate Responsibility	Ongoing	Support of informative actions on Corporate Responsibility
Approval and disclosure of the Sustainable Development Policy	Completed	Establishment of an ESG Strategy

Environmental issues

In the context of Corporate Social Responsibility, the Parent Company has as a goal and strategic priority to effectively manage the environmental impact of its operation, to take all necessary prevention and response measures to contribute to the protection of the environment and natural resources and to pursue systematically the smallest possible environmental footprint.

According to the Corporate Responsibility Report of the Company, the main achievements for the year 2021 are the following:

- Total greenhouse gas emissions from the main building 1,856,70 t CO_2
- Emissions per square meter of main building 0.030 t CO_2

The following tables present the energy and fuel consumption in the Company's buildings:

Electric Energy Consumption	2020	2021
Central Building Complex	3,821,226 kwh	3,989,007 kwh
Other facilities	2,420,917 kwh	3,074,265 kwh
Fuel consumption	**2020**	**2021**
Central Building Complex	894,810 kwh	1,479,816 kwh

The above data for the year 2022 will be available after the publication of the Financial Statements.

The Parent Company proceeded to the calculation of the greenhouse gas emissions for the activities related to the central office building of Ethniki Asfalistiki (103-105 Syggrou Ave., Athens 11745). The calculation of these emissions was secured and confirmed externally by the Center for Sustainability and Excellence (CSE).

Greenhouse gas emissions	2020	2021
Scope 1 - emissions from company vehicles and from the use of natural gas for building needs	220.33 t CO_2	257.65 t CO2
Scope 2 - emissions from electricity consumption	2,186.35 t CO_2	1,591.75 t CO_2
Scope 3 - emissions from business trips (flights) and paper consumption	8.11 t CO_2	7.30 t CO_2
Total	**2,414.79 t CO_2**	**1,856.70 t CO_2**

The above data for the year 2022 will be available after the publication of the Financial Statements.

At the same time, the Parent Company has undertaken specific environmental actions that include:

o Reuse / recycle printing supplies

o Paper and plastic recycling

o Battery recycling

o Use of LED lamps

o Implementation of MPS (Managed Printing Services) project and homogenized and efficient management of printing operations

o Financial support of Attica Forest Protection Volunteers (E.DAS.A)

o Financial support of Rescue and Forest Protection Volunteers

The following table shows some details about waste management.

Waste management	2020	2021
Paper recycling	5.2 tons	7.2 tons
Batteries	73 kg	83 kg
Plastic	Management through blue buckets	Management through blue buckets

Finally, Ethniki incorporates financial products into its investment policy, taking into account ESG (Environmental - Social - Governance) criteria

Disclosures based on Article 8 of Taxonomy Regulation

Taxonomy

Regulation (EC) 2020/852 is a key element of the action plan drawn up by the European Commission to redirect capital flows to a more sustainable economy. It represents an important step towards achieving carbon emission neutrality by 2050, in line with the European Union's objectives, as the classification regulation is a classification system for environmentally sustainable economic activities.

The Taxonomy regulation recognizes various economic activities as "green" or "environmentally sustainable", as long as they contribute significantly at least one of the following environmental objectives.

- Mitigation of climate change
- Adaptation to climate change
- Sustainable use and protection of water and marine resources
- Transition to a circular economy
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

Eligible investment activities meet specific requirements and the following criteria should be applied cumulatively to determine the degree of viability of an investment:

- Contribute significantly to the achievement of one or more of the above objectives.
- Do not significantly burden any of the goals.
- Practice with minimum safeguards, ie implement specific procedures to ensure compliance with the OECD, United Nations guidelines and the principles and rights of the International Labor Organization and the International Charter of Human Rights.

o Comply with the technical viability control criteria established by the Commission in accordance with the relevant articles of the Rules of Procedure

The regulation is essentially a tool that promotes transparency in the mandatory disclosures of companies covered by the Non-Financial Reporting Directive 2014/95/EU (NFRD). The obligated companies disclose the percentage of activities aligned with the taxonomy, however the list of eligible taxonomic activities is merely indicative to prospective investors and is not a requirement to measure climate performance for companies and financial services, so investors they can evaluate the viability of investments on their own and freely choose where to invest.

In addition, economic activities that are not recognized as eligible by the classification regulation are not necessarily environmentally harmful or unsustainable. The regulation simply sets out criteria for areas of activity that are more relevant and achieve neutrality on climate change and environmental objectives. At this stage, the regulation sets out "technical control criteria" for the first two environmental objectives relating to mitigation and adaptation to climate change, with the remaining four objectives to be further analyzed in a future revision of the Regulation.

The regulation states that the European Commission will review and possibly review the implementation of the regulation by 30.06.2024 to consider the introduction of exposures to central governments and central banks but companies that are not required to notify under Articles 19a or 29a of delegated regulation 2013/34 / EU, in the calculation of performance indicators.

The regulation defines a transitional period of two years where required financial companies apply a simplified method of classifying activities, where only eligibility should be disclosed, regardless of whether the activities meet some or all of the technical control criteria (aligned activities). Therefore, the fact that an activity is eligible does not necessarily mean that it is "green" or "environmentally sustainable", but it will be revised with the regulation being updated in the future. The alignment of the activities with the classification should be announced for the financial year 2023.

Article 8 of the Regulation defines the mandatory disclosures for insurance companies which relate to the activity of General Insurance and more specifically the following activities:

- Medical expense
- Motor
- Fire
- General third party liability
- Other Non-Life

Group evaluates the risks based on the qualitative and quantitative characteristics and separates them based on the evaluation of each individual risk, while at the same time it integrates the definition of the climate risks in the process of undertaking the initial insurance, both for individual and for group and business risks. The Group also evaluates climatic factors that affect the same coverage and adjusts its pre-insurance and reinsurance policy accordingly.

The first KPI relates to risk-taking activities and represents the percentage of total risk-taking activities related to climate change adaptation carried out in accordance with Commission Delegated Regulation (EC) 2021/2139 (“delegated act on climate“).

Basic KPI Underwriting Non-Life Risks – Group	**Premium pct% * 2022 (policy level)**	**Premium amount * 2022 (policy level)**	**Premium pct% * 2022 (coverage level)**	**Premium amount * 2022 (coverage level)**
	%	**€ million**	**%**	**€ million**
Eligible Underwriting activities, Non-Life	49%	132.4	22%	59.3
Non Eligible Underwriting activities, Non-Life	51%	136.5	78%	209.6
Total Production	**100%**	**268.9**	**100%**	**268.9**

*gross written premiums and policy fees

The second KPI relates to the Group's investment policy for funds raised from risk-taking activities and expresses the percentage of assets invested in classified activities over total assets. It is noted that exposures to central governments, central banks and supranational issuers are excluded from the calculation of the numerator and denominator of key performance indicators for financial corporations.

Basic KPI Investment Policy	Group	
	Percentage 2022	Assets 2022
	%	€ million
Total Assets		**3,826**
Exposure to Central Government and Central Banks and Supranational issuers	46%	1,748
Exposure on Assets not participating the KPI calculation	12%	471
Total Assets covered by the KPI	**42%**	**1,607**
Exposure on financial & non-financial corporations (including Mutual Funds)	81%	1,296
Other exposure	10%	166
Non eligible exposure related to the KPI	**91%**	**1,462**
Exposure in eligible activities based on taxonomy	9%	145
Other exposure	0%	-
Eligible exposure related to the KPI	**9%**	**145**
Total Assets covered by the KPI	**100%**	**1,607**

Social and Labour issues

One of the main goals of the Parent Company is to support the society and the economy, acknowledging the important position it has in it.

To that end, the Parent Company, undertakes actions and initiatives that focus on supporting vulnerable social groups, on strengthening initiatives for social protection, on welfare and solidarity, on supporting innovative entrepreneurship with emphasis on people, the environment and sustainable development. In addition, the company continuously supports the efforts of various institutions with recognized social action.

Special mention must be made to the important role the Parent Company has shown in the promotion of culture and sports, by supporting related organizations which promote culture and reinforce the sport ideal, sponsoring sports activities (e.g. NoFinishLine 2022) and cultural events. (Historical Memory site 1941-1944, in 4 Korai str., as well as the Art Place «STOart KORAI»).

Furthermore, recognizing the value and the importance of private insurance, the company supports organizations and institutions, by financing conferences and events aimed at strengthening the awareness, of the insurance conscience, in Greece.

Since its founding, the Parent Company, consistently supports a human-centered vision that defines all its activities. The ongoing goal of the Parent Company and its subsidiaries, is to provide equal treatment and opportunities to all employees and safeguard optimal working conditions.

For this reason, it has adopted the Employee Code of Conduct and Ethics which defines the framework, under which, Management and employees perform their duties.

In line to the Code of Conduct and Ethics, the Group:

- Provides equal opportunities for promotions and professional development, regardless of gender, age, religion, nationality
- Implements a meritocratic system for performance appraisal, promotions and employee remuneration
- Develops and implements processes, systems and incentives, in order to attract, select and advance its workforce

- Invests in the professional training of its workforce making us of up to date methods, as well as, develops its workforce by designing an annual training plan per job, in order to ensure the utilization of its maximum capacity and the timely and smooth adjustment to the increasing demands for new knowledge, skills and specializations in a rapidly changing and digital business environment
- Consider positively at distance work, collaboration, meetings and training

Another top priority area for the Parent Company and its subsidiaries, is health and safety in the work place, in order to safeguard and improve the professional life of all the employees and prevent related risks. The Group, regularly, monitors the implemented security measures and controls, for their appropriateness and sufficiency and their compliance with hygiene conditions in the workplace, while, at the same time has emergency response plans in place.

The Group is committed to:

- Complies with the regulations and instructions and recommendations of the Health Authorities on health and safety issues
- Ensuring the creation of a safe and healthy work environment, through the implementation of programs for prevention of health and safety risk
- Ensuring the availability of protective infrastructure and equipment and techniques dealing with emergencies
- Training all employees for the appropriate actions to be taken in case of natural disasters and designing preventive action plans for fire safety and crisis management, as part of its Business Continuity Plan
- Consulting with employees for issues related to the health and safety regulations at work

Designing programs and actions aiming, both to prevent working hazards as well as to support employees in cases of incidents of violence.

Respecting Human rights

The Group's philosophy is based on the cornerstone of respecting every employee's personality. The protection of human dignity constitutes a fundamental principle; hence the continuous pursuit and commitment of the Group to form a work environment preserving harmony.

For that purpose, the Group:

- Does not use any form of forced labor.
- It has established a Policy against Violence and Harassment, which expresses the commitment of the Group to deal with and eliminate such phenomena in the workplace, in order to create a working environment where respect for human dignity will prevail.
- Expressly and unequivocally states that all forms of violence and harassment that occur during, or related to, or including violence and sexual harassment and sexual harassment are strictly prohibited.
- Does not accept any kind of unequal treatment because of nationality, racial origin, gender, marital status, religious or political beliefs or physical weaknesses, and

Rejects every form of social exclusion.

Combating corruption and bribery issues

The Group demonstrates zero tolerance for acts of corruption and bribery, with particular emphasis on preventing and combating them.

In order for the Group to fully comply with the relevant regulatory framework and international best practices and taking into consideration the fact that potential incidents may undermine the companies' governance systems, the following policies and codes have been adopted and are being implemented:

Code of Ethics of the Group

The Code of Ethics clearly sets out the ethical principles, values and rules that define the limits of the action of Personnel and Management. At the same time, it provides the guidelines for making the right decisions in accordance with the rules of corporate governance and the legislative and regulatory framework per country in which the Group operates.

Whistleblowing

The Parent Company has adopted a Whistleblowing Policy for the submission, either anonymously or not, of confidential reports or comments from any interested party regarding actions of the Parent Company's executives, which create doubts about irregular actions and accounting and auditing practices, which are incompatible with international practice and regulations in force. The Policy was updated in the year 2021 in harmonization with the requirements of the new labor law (L.4808 / 2021) regarding violence and harassment in the workplace.

This process is monitored in terms of its implementation by the Audit Committee of the BoD. On the website of the Parent Company (www.ethniki-asfalistiki.gr) contact details have been posted and a relevant form has been created for the submission of the aforementioned confidential reports by any interested party.

Anti-Fraud Policy of the Parent Company and its subsidiaries

The Parent Company and its subsidiaries are exposed to the risk of fraud and illegal activities of any kind, where if not dealt with in a timely and effective manner, could result in negative consequences on its business, its financial situation, the results of its activities and its prospects for success.

The Parent Company and its subsidiaries, aiming at the fight against the phenomenon of fraud, have adopted an Anti-Fraud Policy, which establishes the basic principles to prevent and deal with fraud. This Policy concerns all personnel and aims at raising awareness among the Group's employees, regarding the prevention and suppression of fraud.

Conflict of Interest Prevention Policy i. in the distribution of insurance products ii. for Board members, Senior Executives and other Related Parties of the Company

The above Policies identify potential areas of conflict of interest and establish rules and procedures for the effective management of cases of conflict of interest, when they arise.

Group Policy for the prevention and suppression of Money Laundering and Financing of Terrorism ("AML/CFT")

The above actions are contrary to the fundamental values and principles governing the conduct of the Group's business, while their occurrence could lead to undesirable consequences, with a significant impact to the Group's reputation, as well as on the interests of customers, shareholders and employees.

For this reason, and in accordance with the applicable regulatory requirements for the prevention and suppression of AML / CFT phenomena, the Group has adopted the above Policy, which also incorporates a New Customer Acceptance Policy.

This Policy establishes an adequate, effective and harmonized framework for the Group's compliance with the respective legal framework regarding the suppression of AML / CFT in the countries where the Group operates as well as with the relevant requirements of the Supervisory Authorities. Pursuant to the above Policies, procedures have been established and adopted regarding a risk-based approach, customer categorization and the corresponding implementation of due diligence measures.

In addition, the Group does not execute transactions for the legality of which there are reservations or transactions with natural or legal persons / entities which are prohibited by provisions of international Organizations, Supervisory or Judicial Authorities. Finally, the Group provides personnel and insurance intermediaries with ongoing training to comply with the relevant laws and regulatory decisions.

Awards - Distinctions

For 2022, the Parent Company received significant awards and distinctions such as:

- "Bronze award" for the effective implementation of Corporate Responsibility and Sustainable Development practices, within the context of the "CR Index 2021-2022" evaluation procedures
- "Product of the Year 2022" for FULL [Life Plan], an insurance-investment product, by Direction Business Network
- Awarded by the Olympic Museum of Thessaloniki for its contribution to the spread of Olympism

Presentation of the Corporate Social Responsibility actions for 2022

The Parent Company, in the context of providing complete information and being transparent on its CSR activities, communicated to the public that it:

- Supported events, training days and conferences organized by chambers and institutions of the private insurance and economy sector
- Supported organizations and institutions aiming to stand by the community at all times
- Implemented actions that steadily promote the Arts, History and Culture, meanwhile having the responsibility for managing and operating the "Korai 4, Memorial Site 1941-44" as well as the "Stoart KORAI" Art Place,
- Supported Greek athletes for the promotion of the athletic spirit and fair play
- Reinforced institutions and organizations in the field of education, health and science as well as actions that promote environmental awareness.

Corporate Governance Code

The corporate governance system of the Parent Company meets the requirements of the current greek and european legal and regulatory framework and international best practices.

The Group has enacted a Corporate Governance Code which describes its structure and operation in matters of governance, in order to to enhance, in the long term, corporate value for the shareholders and secure the interests of insurers, employees and stakeholders in general. The Code represents a framework which promotes continuity, cohesion and effectiveness in the way the Board of Directors of the Company operates. The BoD is supported in its operation by the following Committees:

- Audit Committee,
- Risk Management Committee,
- Remuneration and Nomination Committee.

The Code and the Rules of Procedure of the aforementioned Committees define the purpose, the duties and allocate responsibilities to the Committees.

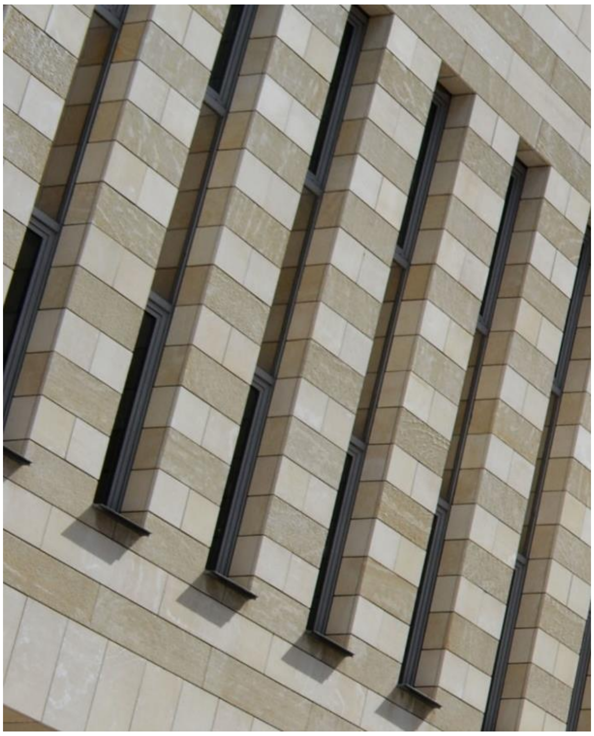
The Parent Company has a transparent organizational structure with a clear allocation and appropriate segregation of responsibilities, as well as an efficient inter-company information transmission mechanism. In this context, the Parent Company has developed a set of policies and procedures which describe the allocation of responsibilities and roles and contribute to the achievement of corporate objectives. In addition, the four key functions of the Parent Company, namely the Risk Management, Compliance, Actuarial and Internal Audit units, contribute to the successful operation of Corporate Governance, by ensuring the implementation of an effective internal control and risk management system.

The subsidiaries of the Group are also obliged to adopt the above framework of operation and organization, harmonized with the respective institutional framework, features and honest practices of the country in which they operate. The policies, procedures and overall corporate governance requirements implemented by the Parent Company are adjusted to suit the operational structure, scale and complexity of activities of the Group companies.

Prospects for 2023

The prospects of the Insurance Industry are favorable, as GWP production for the prior year increased, following the upward economic trend in Greece, whereas the greatest challenges for insurance companies are concentrated on mitigating the inflationary pressures, on digital transformation and on management of climate change.

Ethniki Insurance constantly monitors market trends and in alignment with them redesigns its product base, always aiming at affordable pricing for all policyholders and building a stable relationship of trust.



Athens, 11 May 2023

The Chairman

Andrzej Piotr Klesyk

INDEPENDENT AUDITOR'S REPORT

[Translation from the original text in Greek]

Independent Auditor's Report

To the Shareholder of "Ethniki Insurance Company S.A."

Report on the audit of the separate and consolidated financial statements

Our opinion

We have audited the accompanying separate and consolidated financial statements of Ethniki Insurance Company S.A. (Company or/and Group) which comprise the separate and consolidated statement of financial position as of 31 December 2022, the separate and consolidated statements of comprehensive income, changes in equity and cash flow statements for the year then ended, and notes to the separate and consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the separate and consolidated financial statements present fairly, in all material respects the separate and consolidated financial position of the Company and the Group as at 31 December 2022, their separate and consolidated financial performance and their separate and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the statutory requirements of Law 4548/2018.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs), as they have been transposed into Greek Law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the separate and consolidated financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

During our audit we remained independent of the Company and the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) that has been transposed into Greek Law, and the ethical requirements of Law 4449/2017 and of Regulation (EU) No 537/2014, that are relevant to the audit of the separate and consolidated financial statements in Greece. We have fulfilled our other ethical responsibilities in accordance with Law 4449/2017, Regulation (EU) No 537/2014 and the requirements of the IESBA Code.

We declare that for the year ended as at 31st December 2022 we have not provided non-audit services to the Company and its subsidiaries.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate and consolidated financial statements of the current period. These matters were addressed in the context of our audit of the separate and consolidated 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 matter
Valuation of liabilities arising from Life Insurance Contracts (separate and consolidated financial statements) Insurance contract liabilities include the estimated cost of settling policyholder benefits and claims associated with life insurance contracts which amount to €550m for the Company and €570m for the Group, representing 17% and 18% of the Company's and Group's total liabilities respectively. The valuation of these liabilities is complex, highly judgmental and requires management to make a number of assumptions regarding future events that are linked to high estimation uncertainty. Small changes in key assumptions used may lead to a material impact on the valuation of these liabilities and operating performance of the Company and the Group. We focused on this area because of the significance of these amounts and the need for management to use complex actuarial methodologies and assumption setting processes relating to future events. Moreover, actuarial assumptions, which are based on economic and demographic data, including future policyholder behaviour, are highly judgmental.	Our audit was supported by our internal life actuarial specialists and included the following procedures: • We tested the underlying data used in the projection of future cash flows and in the experience studies that support the actuarial assumptions used for accuracy and completeness. • We challenged the methodology and significant assumptions used by applying our knowledge of the Company as well as the industry and experience to assess whether such methodologies are in compliance with recognized actuarial practices as well as regulatory and financial reporting requirements. • We performed independent testing of mathematical reserves and cash flow model projections, on a sample basis, including detailed independent recalculations on selected policies and products to assess the reasonableness of management's estimates of life insurance liabilities. • We performed an assessment of the reasonableness of the year on year movement in the life insurance liabilities and obtained explanations from management to support any differences where this was deemed necessary.

Key audit matters	How our audit addressed the key audit matter
In particular the significant assumptions, which are highly sensitive to changes, are the following: • The yield curve used for discounting the projected cash flows, which is based on the risk-free rates curve published by the European Insurance and Occupational Pension Authority (EIOPA), is adjusted by an illiquidity premium assumption, based on the returns of the Company's asset portfolio. • The morbidity table, which is used to project the future cash flows of health products, is based on the Company's and the Group's actual experience and expert judgment regarding ages for which there is an absence of sufficient experience. The tables are produced for each health product on a per age and gender level of detail. • The lapse rate, which is a significant decrement rate that drives the policies in force to gradually decrease over time, could potentially affect the projected cash flows positively or negatively, depending on the profitability of each product. Refer to notes 2.11, 3.1, 4.2 and 36 of the separate and consolidated financial statements	More specifically, the significant assumptions we focused on, were the following: **Yield curve** We assessed the methodology used by management to determine the yield curve developed for purposes of discounting the projected future cash flows to present value. We also tested the appropriateness of investment data and yields used for purposes of determining the illiquidity premium which is reflected in the yield curve. **Morbidity** We assessed the appropriateness of the methodology used by management for the compilation of morbidity tables based on actual experience and expert judgment. We evaluated the reasonableness of any adjustments made for premium indexation, medical inflation and large claim factors. **Lapses** We reviewed the appropriateness of the methodology used by management for determining the lapse rates based on generally accepted market practice and the specifics of the Company for each distribution channel and product category. Based on our procedures, we found that the significant assumptions used to value life insurance liabilities to be reasonable. We also found the methodologies to be consistent with industry standards and appropriately reflect the nature and risk profile of the Company's and the Group's life insurance contracts. Furthermore, we found the disclosures in the financial statements to be appropriate.

Key audit matters	How our audit addressed the key audit matter
Valuation of Non-Life Outstanding Claims reserves (separate and consolidated financial statements) Insurance contract liabilities include outstanding claims under general insurance contracts amounting to €314.6m for the Company and €324.4m for the Group, representing 10% of the Company's and Group's total liabilities respectively. The estimation of outstanding claims involves significant judgment given the size of the liability and inherent uncertainty in estimating expected future payments for claims incurred. The valuation of outstanding claims is dependent upon the quality of the underlying data. It also involves complex and subjective judgments about future events, both internal and external, for which small changes in assumptions can result in a material impact to the valuation of these liabilities and operating performance. Refer to Notes 2.11, 3.1, 4.2 and 36 of the separate and consolidated financial statements.	Our work was supported by our internal Non-life actuarial specialists and included the following procedures: • We obtained an understanding of the Company's and the Group's reserving policy and process for recording outstanding claims. • We tested, on a sample basis, the reasonableness of reserves recorded for outstanding motor and fire claims by reference to the Company's and the Group's reserving policy, underlying insurance contract and most recently available supporting claims documentation. • We assessed the reasonableness of the estimation for the reserve of the incurred but not reported (IBNR) claims at the balance sheet date by carrying out an independent test of management's IBNR calculation for the main classes of business. • We tested, on a sample basis, the reasonableness of management's reserve estimates for outstanding claims of motor and fire lines of businesses at the balance sheet date by comparing such estimates with actual claim payments made during the period subsequent to the balance sheet date. • We performed an assessment of the reasonableness of the year on year movement in outstanding claims and sought to understand any significant differences. Based on our procedures, we found the liability for outstanding claims under non-life insurance contracts to be reasonable. We also found the disclosures in the financial statements to be appropriate

Other Information

The members of the Board of Directors are responsible for the Other Information. The Other Information, which is included in the Annual Report in accordance with Law 3556/2007, is the Statements of Board of Directors members and the Board of Directors Report (but does not include the financial statements and our auditor's report thereon), which we obtained prior to the date of this auditor's report.

Our opinion on the separate and consolidated financial statements does not cover the Other Information and except to the extent otherwise explicitly stated in this section of our Report, we do not express an audit opinion or other form of assurance thereon.

In connection with our audit of the separate and consolidated financial statements, our responsibility is to read the Other Information identified above and, in doing so, consider whether the Other Information is materially inconsistent with the separate and consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

We considered whether the Board of Directors Report includes the disclosures required by Law 4548/2018.

Based on the audit work undertaken, in our opinion:

- The information given in the Board of Directors' Report for the year ended 31 December 2022 is consistent with the separate and consolidated financial statements,

- The Board of Directors' Report has been prepared in accordance with the legal requirements of articles 150, 151, 153 and 154 of Law 4548/2018.

In addition, in light of the knowledge and understanding obtained of the Company and the Group and their environment during the course of our audit, we are required to report if we have identified any material misstatements in the Board of Directors' Report and Other Information that we obtained prior to the date of this auditor's report. We have nothing to report in this respect.

Responsibilities of Board of Directors and those charged with governance for the separate and consolidated financial statements

The Board of Directors is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the requirements of Law 4548/2018, and for such internal control as the Board of Directors determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, the Board of Directors is responsible for assessing the Company's and Group'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 the Board of Directors either intends to liquidate the Company and Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's and Group's financial reporting process.

Auditor's responsibilities for the audit of the separate and consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated 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 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 separate and consolidated financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate and consolidated 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 and Group's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.

- Conclude on the appropriateness of Board of Directors' 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 and Group'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 separate and consolidated 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 and Group to cease to continue as a going concern.

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

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the Company and Group audit. We remain solely responsible for our audit opinion.

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 to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate and consolidated financial statements of the year under audit and are therefore the key audit matters. We describe these matters in our auditor's report.

Report on other legal and regulatory requirements

1. **Additional Report to the Audit Committee**

Our opinion on the accompanying separate and consolidated financial statements is consistent with our, as per article 11 of Regulation (EU) 537/2014 required, Additional Report to the Audit Committee of the Company.

2. **Appointment**

We were first appointed as auditors of the Company by the decision of the annual general meeting of shareholders on 12 July 2017. Our appointment has been renewed annually by the decision of the annual general meeting of shareholders for a total uninterrupted period of appointment of 6 years.

Athens, 12 May 2023

The Certified Auditor

PricewaterhouseCoopers S.A.
268 Kifissias Avenue,
Halandri 152 32
SOEL Reg. No.113

Dimitris Sourbis
SOEL Reg. No. 16891

2022

Group and Parent Company Annual Financial Statements

as at and for the year ended 31 December 2022

STATEMENT OF TOTAL COMPREHENSIVE INCOME

		GROUP		PARENT COMPANY	
		31/12/2022	31/12/2021	31/12/2022	31/12/2021
	Note	*(€ thousands)*			
Gross earned premiums and related income	6	610,959	587,027	564,959	543,782
Less: premiums ceded to reinsurers	7	(76,619)	(71,365)	(66,743)	(62,205)
Net earned premiums and related income		**534,340**	**515,662**	**498,216**	**481,577**
Interest, dividends and other investment income	8	36,902	38,463	35,880	37,570
Gains/(losses) on disposal of investments	9	61,251	28,574	61,461	28,574
Unrealized gains/(losses) from investments	10	(37,890)	12,838	(23,203)	16,150
Impairment of financial assets	11	(14,840)	(1,437)	(13,136)	(1,437)
Investment income		**45,423**	**78,438**	**61,002**	**80,857**
Other income	12	5,380	5,185	4,998	4,451
		585,143	**599,285**	**564,216**	**566,885**
Policyholder benefits and claims incurred	13	(339,655)	(317,063)	(324,085)	(302,161)
Commission expenses	14	(85,191)	(79,688)	(79,442)	(74,628)
Movement in mathematical insurance reserves	15	(13,257)	(11,588)	(13,674)	(9,121)
General and administrative expenses	16	(112,108)	(114,860)	(101,234)	(104,968)
Finance costs	17	(13,271)	(6,899)	(13,050)	(6,694)
Other expenses		(552)	(70)	(451)	(1)
Profit before tax		**21,109**	**69,117**	**32,280**	**69,312**
Income tax expense	18	(27,524)	(17,131)	(27,706)	(17,393)
Profit, net of tax		**(6,415)**	**51,986**	**4,574**	**51,919**
Other comprehensive income (OCI) net of tax:					
Items to be reclassified to profit or loss in subsequent periods:					
Available-for-sale securities, net of tax		(531,728)	(88,873)	(530,732)	(88,258)
Currency translation differences, net of tax		(161)	(264)	-	-
Total		**(531,889)**	**(89,137)**	**(530,732)**	**(88,258)**
Items not to be reclassified to profit or loss in subsequent periods:					
Remeasurement of defined benefit obligations		7,055	(1,178)	7,055	(1,178)
Total		**7,055**	**(1,178)**	**7,055**	**(1,178)**
Other comprehensive income, net of tax	19	**(524,834)**	**(90,315)**	**(523,677)**	**(89,436)**
Total comprehensive income, net of tax		**(531,249)**	**(38,329)**	**(519,103)**	**(37,517)**
Profit /(loss), net of tax, attributable to:					
- the Parent Company		**(6,315)**	**52,065**	**4,574**	**51,919**
- Non-controlling interests		**(100)**	**(79)**	**-**	**-**
Total comprehensive income, net of tax, attributable to:					
- the Parent Company		**(531,111)**	**(38,206)**	**(519,103)**	**(37,517)**
- Non-controlling interests		**(138)**	**(123)**	**-**	**-**

The explanatory notes on pages 41 to 122 form an integral part of these financial statements.

Athens, 11 May 2023

The Chairman of the Board	The Chief Executive Officer	The Chief Financial Officer	The Chief Actuary	The Chief Accountant
Andrzej Piotr Klesyk ID No EN3616809	Robert Constantin Gauci ID No 21DE07141	S.E. Karagrigoriou ID No AR 032104	G. Ch. Mamoulakis ID No AH 125609	G.L. Gennimatas License No. 91312 Class A

STATEMENT OF FINANCIAL POSITION

	Note	GROUP 31/12/2022	GROUP 31/12/2021	PARENT COMPANY 31/12/2022	PARENT COMPANY 31/12/2021
		(€ thousands)			
ASSETS					
Property and equipment	20	109,344	117,420	105,902	111,373
Investment property	21	73,739	78,408	73,739	77,959
Intangible assets	22	12,559	11,266	12,333	10,221
Deferred acquisition costs (DAC)	23	44,692	44,975	42,325	41,790
Investment in subsidiaries	24	-	-	5,704	12,232
Deferred tax assets	25	134,783	15,403	134,783	14,830
Available-for-sale securities	26	2,508,258	3,204,467	2,508,258	3,194,643
Securities at fair value through profit or loss	27	639,326	640,043	583,364	577,157
Securities classified as loans and receivables	28	40,876	41,018	40,876	41,018
Insurance premium and other receivables	30	102,930	111,079	96,091	99,848
Assets held for sale	20,24	39,124	7,827	8,331	7,827
Reinsurance receivables	31	75,024	91,978	68,114	73,839
Cash and cash equivalents	32	75,323	88,717	62,731	75,394
Total Assets		**3,855,978**	**4,452,601**	**3,742,551**	**4,338,131**
EQUITY AND LIABILITIES					
Shareholders' Equity					
Share capital - paid in	33	235,221	235,221	235,221	235,221
Share premium account		547,429	547,429	547,429	547,429
Reserves	34	(266,329)	261,160	(261,623)	264,641
Retained earnings	35	72,248	167,384	59,335	143,863
		588,569	**1,211,194**	**580,362**	**1,191,154**
Non-controlling interests		**361**	**569**	**-**	**-**
Total equity		**588,930**	**1,211,763**	**580,362**	**1,191,154**
Liabilities					
Mathematical reserves and technical insurance provisions	36	1,550,064	1,502,268	1,478,770	1,416,942
Investment contracts liabilities	37	1,342,390	1,355,662	1,342,390	1,355,662
Other liabilities	38	87,449	77,737	84,177	69,962
Financial liabilities	39	177,166	177,153	177,166	177,153
Income tax liabilities		10,024	4,954	9,797	4,613
Reinsurance liabilities	40	20,032	24,860	20,759	24,441
Retirement benefit obligations	41	49,130	98,204	49,130	98,204
Liabilities directly associated with assets held for sale	24	30,793	-	-	-
Total liabilities		**3,267,048**	**3,240,838**	**3,162,189**	**3,146,977**
Total Equity and Liabilities		**3,855,978**	**4,452,601**	**3,742,551**	**4,338,131**

The explanatory notes on pages 41 to 122 form an integral part of these Financial Statements.

Athens, 11 May 2023

The Chairman of the Board	The Chief Executive Officer	The Chief Financial Officer	The Chief Actuary	The Chief Accountant
Andrzej Piotr Klesyk ID No EN3616809	Robert Constantin Gauci ID No 21DE07141	S.E. Karagrigoriou ID No AR 032104	G. Ch. Mamoulakis ID No AH 125609	G.L. Gennimatas License No. 91312 Class A

STATEMENT OF CHANGES IN EQUITY

GROUP	Share capital	Share premium account	AFS securities reserve	Retirement benefit obligations	Other reserves	Foreign exchange differences	Retained earnings	Total	Non-controlling interests	Total equity
					(€ thousands)					
Balance at 01/01/2021	**490,044**	**547,429**	**331,336**	**(8,474)**	**29,330**	**(4,510)**	**(135,764)**	**1,249,391**	**692**	**1,250,083**
Profit, net of tax	-	-	-	-	-	-	52,065	**52,065**	(79)	51,986
Transfers	(254,823)	-	-	-	3,749	-	251,074	-	-	-
Acquisition/sale of subsidiaries	-	-	-	-	-	-	9	**9**	-	9
Other comprehensive income, net of tax	-	-	(88,842)	(1,178)	-	(251)	-	**(90,271)**	(44)	(90,315)
Balance at 31/12/2021	**235,221**	**547,429**	**242,494**	**(9,652)**	**33,079**	**(4,761)**	**167,384**	**1,211,194**	**569**	**1,211,763**
Profit, net of tax	-	-	-	-	-	-	(6,315)	**(6,315)**	(100)	(6,415)
Transfers	-	-	-	-	(1,441)	-	1,644	**202**	-	202
Dividend distribution	-	-	-	-	(1,251)	-	(90,438)	**(91,689)**	-	(91,689)
Acquisition/sale of subsidiaries	-	-	-	-	-	-	(27)	**(27)**	(70)	(97)
Other comprehensive income, net of tax	-	-	(531,695)	7,055	-	(156)	-	**(524,796)**	(38)	(524,834)
Balance at 31/12/2022	**235,221**	**547,429**	**(289,201)**	**(2,597)**	**30,387**	**(4,917)**	**72,248**	**588,569**	**361**	**588,930**

PARENT COMPANY	Share capital	Share premium account	AFS securities reserve	Retirement benefit obligations	Other reserves	Retained earnings	Total equity
				(€ thousands)			
Balance at 01/01/2021	**490,044**	**547,429**	**330,730**	**(8,474)**	**28,011**	**(159,069)**	**1,228,671**
Profit, net of tax	-	-	-	-	-	51,919	51,919
Transfers	(254,823)	-	-	-	3,810	251,013	-
Other comprehensive income, net of tax	-	-	(88,258)	(1,178)	-	-	(89,436)
Balance at 31/12/2021	**235,221**	**547,429**	**242,472**	**(9,652)**	**31,821**	**143,863**	**1,191,154**
Profit, net of tax	-	-	-	-	-	4,574	4,574
Dividend distribution	-	-	-	-	(1,251)	(90,438)	(91,689)
Transfers	-	-	-	-	(1,336)	1,336	-
Other comprehensive income, net of tax	-	-	(530,732)	7,055	-	-	(523,677)
Balance at 31/12/2022	**235,221**	**547,429**	**(288,260)**	**(2,597)**	**29,234**	**59,335**	**580,362**

The explanatory notes on pages 41 to 122 form an integral part of these Financial Statements.

STATEMENT OF CASH FLOWS

	Note	GROUP 31/12/2022	GROUP 31/12/2021	PARENT COMPANY 31/12/2022	PARENT COMPANY 31/12/2021
		(€ thousands)			
Cash flows from operating activities					
Profit before tax		**21,109**	**69,117**	**32,280**	**69,312**
Adjustments for non-cash items					
Depreciation, amortization and impairment of property, plant & equipment, investment property & intangible assets	16	9,199	10,431	8,335	9,534
Provision for non-performing receivables	16	(595)	(2,375)	(557)	(2,315)
Defined benefit plan cost	41	1,523	1,783	1,523	1,783
Gain on disposal of non financial assets and impairment	12	(421)	(12)	(408)	-
Impairment loss on financial assets	11	3,473	1,437	3,473	1,437
Impairment loss on investment in subsidiaries	11	11,367	-	9,663	-
Gains on disposal on financial assets	9	(55,664)	(28,574)	(55,874)	(28,574)
Profit/Loss on sale of subsidiaries	9	(5,587)	-	(5,587)	-
Unrealised gains on financial assets	10	37,890	(12,838)	23,203	(16,150)
Net interest income and dividends	8,17	(19,669)	(26,922)	(18,630)	(26,026)
Gains / (losses) on foreign exchange differences	12	(435)	(273)	(450)	(156)
Total adjustments for non-cash items		**(18,919)**	**(57,343)**	**(35,309)**	**(60,467)**
Net increase or decrease in operating assets / liabilities					
Financial assets at fair value through profit or loss	10,27	(37,173)	(30,358)	(29,410)	(24,481)
Deferred acquisition costs (DAC)	23	283	(1,467)	(535)	(1,266)
Movement in insurance reserves	36	47,796	13,492	61,828	10,500
Liabilities relating to group investment contracts	37	21,952	8,384	21,952	8,384
Liabilities relating to invetsment contracts to individuals	37	(35,224)	70,611	(35,224)	70,611
Insurance premium and other receivables		904	2,924	(3,645)	3,058
Reinsurance receivables	17,31,40	11,939	(7,868)	1,856	(7,011)
Defined contribution plans	41	(969)	1,831	(969)	1,831
Other liabilities		9,378	981	13,865	804
		21,076	**70,304**	**26,689**	**71,275**
Aquisition of investment securities		(1,062,785)	(1,094,696)	(1,062,758)	(1,094,703)
Disposal of investment securities		1,139,348	873,300	1,139,348	873,300
Purchase of investment property	21	(9)	(15)	(9)	(15)
Proceeds from sale of investment property	9,20,21	9,066	-	9,066	-
Dividends received	8	6,686	1,573	6,573	1,491
Interest received		34,092	32,507	33,737	31,969
Defined benefit plans (contributions and indemnities)	41	(42,444)	21,587	(42,444)	21,587
Income tax paid		(13,945)	2,213	(13,370)	2,801
Net cash used for operating activities		**91,085**	**(93,227)**	**96,832**	**(92,295)**
Cash flows from investing activities					
Purchase of property & equipment, intangible assets	40,17	(7,503)	(5,815)	(6,919)	(5,322)
Proceeds from sale of property & equipment, intangible assets	20,12	1,339	15	1,326	139
Net cash used in investing activities		**(577)**	**(5,800)**	**(5,593)**	**(5,183)**
Cash flows from financing activities					
Increase/ (decrease) of financial liabilities	39	-	125,000	-	125,000
Interest paid	40,17	(12,213)	(3,803)	(12,213)	(3,803)
Divident distribution	34	(91,689)	-	(91,689)	-
Net cash from/ (for) financing activities		**(103,902)**	**121,197**	**(103,902)**	**121,197**
Net increase/(decrease) in cash and cash equivalents		**(13,394)**	**22,170**	**(12,663)**	**23,719**
Cash and cash equivalents at beginning of period		**88,717**	**66,547**	**75,394**	**51,675**
Cash and cash equivalents at end of period	32	**75,323**	**88,717**	**62,731**	**75,394**

The explanatory notes on pages 41 to 122 form an integral part of these Financial Statements.

NOTE 1: GENERAL INFORMATION

The Ethniki, Hellenic General Insurance Company S.A. (the "Company" or "Parent Company") is the oldest insurance company in Greece and has been conducting business continuously for more than 130 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.ethniki-asfalistiki.gr. Pursuant to its Articles of Association, the purpose of the Company is to carry out insurance, reinsurance and, in general, financial activities allowed for insurance companies under the applicable Greek and EU law, and operate in line with the provisions of Greek Law 4548/2018 "Overhaul Law on Société Anonyme Companies" as well as Greek Law 4364/2016 for engaging and pursuing the business of Insurance and Reinsurance (Solvency II) and the provisions of the legal and regulatory framework governing its operation and activities. The Parent Company and its subsidiaries (the "Group") offer a full range of retail and commercial insurance services. The Group is mainly active in Greece, while its subsidiaries are active in Greece, Romania and Cyprus.

On 01.04.2022 National Bank of Greece (by then the Parent Company's sole shareholder) completed its disinvestment of 90.01% of the Parent Company to CVC Capital Partners' Fund VII following the receipt of the required supervisory approvals by national and EU authorities. The transaction comprised the sale of 100% of the Parent Company's shares owned by the Bank to a newly incorporated subsidiary of CVC, Ethniki Holdings S.à r.l. (the "Purchaser") and the Bank's purchase of 9.99% of the shares in the Purchaser.

The Board of Directors on 31st December 2022 consists of the following members:

Full Name	Position on the BoD
Andrzej Piotr Klesyk	Chairman, Independent non-executive member
Stavros Konstantas	Chief Executive Officer, Executive member
Robert Constantin Gauci	Non-executive member
Tassos Anastasiou	Executive member
Stavros Karagrigoriou	Executive member
Matthew George Alfred Bryant	Non-executive member
Peter William James Rutland	Non-executive member
Konstantinos Rokas	Non-executive member
Alexandros Fotakidis	Non-executive member
Christina Theofilidi	Non-executive member
Stuart Jeffrey Davies	Independent non-executive member
Vassileios Mastrokalos	Independent non-executive member

The no.173/14.4.2022 regular General Meeting of Shareholders decided to elect a new Board of Directors. The term of office of the members of the Board of Directors is three years (until 14.04.2025), which is extended until the first Ordinary General Meeting of the Company's shareholders and will meet after the end of the term of the Board of Directors. From the Board of Directors, Messrs Christoforos V. Sardelis, Panagiotis A. Dasmanoglou, Angeliki I. Skandaliari, Nikolaos E. Fragos, Nikolaos G. Milios, Petros I. Lyrintzis and Christodoulos D. Christodoulou, stepped down.

At the no.2322/13.12.2022 meeting of the Board of Directors, it was brought to the attention of the Board the resignation of the Chief Executive Officer and one of its members, Mr. Stavros Konstantas. Both resignations were effected on 31.12.2022.

The no.2324/02.01.2023 meeting of the Board of Directors unanimously approved the evaluation of the "Suitability and Credibility" of the new Chief Executive Officer, Mr. Robert Constantin Gauci, leading to the recomposition and the reconstitution of the Board.

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

These annual separate and consolidated Financial Statements have been approved by the Board of Directors of the Parent Company on 11 May 2023.

NOTE 2: SUMMARY OF SIGNIFICANT ACCOUNTING PRINCIPLES & POLICIES

2.1 Basis of preparation of Financial Statements

The consolidated financial statements of the Group and the separate financial statements of the Parent Company for the year ended 31 December 2022 (the "Financial Statements") have been prepared in accordance with International Financial Reporting Standards ("IFRS") as endorsed by the European Union ("EU").

The amounts are stated in Euro, rounded to the nearest thousand (unless otherwise stated).

Comparative figures have been adjusted to conform to changes in current period's presentation, as disclosed in Note 46.

The Financial Statements have been prepared under the historical cost convention, except for the available-for-sale investment portfolio, financial assets and financial liabilities held at fair value through profit or loss, all derivative contracts, and a) assets held for sale which are measured at the lower of carrying amount and fair value less costs to sell and b) employee benefit plans which are measured based on the projected unit credit method.

The preparation of Financial Statements in conformity with IFRS requires the use of estimates and assumptions that affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities at the reporting date of the Financial Statements and the reported amounts of revenues and expenses during the reporting period. Use of available information and exercise of judgment are inherent in the formation of estimates. Actual results in the future may differ from those reported.

The areas involving a higher degree of judgment or complexity, or areas where assumptions and estimates are significant to the annual Financial Statements are disclosed in Note 3.

2.2 Going concern

In preparing the financial statements for the period ending on 31.12.2022, the going concern basis was adopted. The Board has considered the current economic developments, the company's financial performance, and made estimates in the near future in relation to the state of the economic environment in which the Group operates. In carrying out their assessments, the Directors have considered the following factors.

- **Developments in the macroeconomic environment**

The business environment both in Greece and worldwide, was characterized by increased uncertainty, which is reinforced by geopolitical instability. Lately, the Covid-19 pandemic has been in relative remission.

The increase in oil prices and in other products, observed since 2021, has intensified after the outbreak of the Russian-Ukrainian crisis and has driven inflation to high levels. This resulted in restrictive monetary policy measures and a rise in interest rates. Inflation gradually increased, but the measures taken to contain it seem to be effective so far, as an overall de-escalation has been observed lately, both in Europe and in Greece.

As a consequence of the above, the low-interest rate trend previously observed has been reversed. In 2022, the European Central Bank (ECB) proceeded with 4 increases in its key interest rates. Indicatively, the refinancing interest rate stands at 3.5%, after a March 2023 increase, versus 0% at the beginning of 2022. The average interest rate for the first 30 years of the risk-free interest rate curve increased from 0.35% at the end of 2021 to 2.9% at the end of 2022, thus lessening the pressure on the insurers' insurance portfolios, especially on their Life products portfolios with high guaranteed interest rates. In order to assess the overall impact, the impact of the rise in bond yields on the insurers' existing investment portfolios should also be considered.

Especially for Greece, the growth observed in 2021 continued again in 2022, albeit at a slower pace. According to the latest European Commission forecasts, the rate of the GDP change for 2022 is anticipated to stand at 5.5%, while a slower growth pace is expected in the coming years (Source: European Commission Forecasts, February 2023). At the same time, the unemployment rate dropped from 12.9% at the end of 2021 to 11.6% at the end of 2022 (Source: Eurostat).

Climate change, its intensity and extent, have a significant impact on shaping the business environment. Its consequences in terms of natural disasters (drought, floods, wildfires, etc.), differ from country to country and represent a challenge for insurers, as they may be requested to pay higher compensation, but may also lead to increased demand for related insurance products and the need to design new ones. The need to reverse climate change and the placement of the relevant issue high on the agenda of sovereign states and supranational bodies, are expected to lead to new consumer behaviors, new investment behaviors and changes in entire industry sectors. The European Union is developing actions, as in the context of the "NextGenerationEU" plan, to make Europe "climate neutral" by 2050. At the same time, developments in the field of medicine are expected to lead to an increase in life expectancy and medical acts cost, especially in developed countries.

Digital transformation of economies and businesses is accelerating, also supported by actions such as the "NextGenerationEU" plan and the "Greece 2.0" plan, and, along with it, the number of electronic transactions is increasing as well. This fact, in addition to opportunities, also poses risks to businesses, since they could deal with an increased cybercrime risk. At the same time, these threats may lead to an increased demand for relevant insurance coverage.

- **Profitability**

For the period ending 31.12.2022, profit before tax amounted to €21,1m for the Group and to €32,2m for the Parent confirming the Group's positive performance.

- **Capital adequacy**

The Solvency Capital Requirement ratio, even without the use of transitional measures, for the period ending on 31.12.2022 was 187% compared with the respective ratio of 184% on 31.12.2021, being much higher than the 100% threshold.

- **Going concern assessment**

Based on the above factors and taking into consideration:

(a) the recurring profitability both of the group and the parent company,

(b) the maintenance of the Solvency Capital Requirement ratio, even without the use of transitional measures, much higher than the 100% threshold

(c) the extensive and continuous fiscal and monetary support of the European and Greek authorities in response to the unprecedented COVID-19 crisis in 2020 and 2021 and

(d) the activation of new fiscal measures in response to pressures from increased inflation,

the Board has a reasonable expectation that the Group will be able to continue in operation for the next 12 months, and it therefore continues to adopt the going concern basis in preparing the financial statements.

2.3 Adoption of International Financial Reporting Standards (IFRS)

2.3.1. New standards, amendments and interpretations to existing standards adopted by the Group as of 1 January 2022

The following amendments to existing standards as issued by the IASB apply for the first time to the financial reporting period beginning on 1 January 2022.

Property, Plant and Equipment (PPE): Proceeds before intended use - Amendments to IAS 16

The amendment prohibits an entity from deducting from the cost of an item of PPE any proceeds received from selling items produced while the entity is preparing the asset for its intended use. Therefore, proceeds from selling items before the related item of PPE is available for use should be recognised in profit or loss, together with the costs of producing those items. The amendments also clarify that testing whether an item of PPE is functioning properly means assessing its technical and physical performance rather than assessing its financial performance – e.g., assessing whether the PPE has achieved a certain level of operating margin. The financial performance of the asset is not relevant to this assessment.

Onerous Contracts: Cost of fulfilling a contract - Amendments to IAS 37

The amendment clarifies that the direct costs of fulfilling a contract include both the incremental costs of fulfilling the contract (e.g., direct labour and materials) and an allocation of other costs directly related to fulfilling contracts (e.g., an allocation of the depreciation charge for an item of property, plant and equipment used in fulfilling the contract). Before recognising a separate provision for an onerous contract, the entity recognises any impairment loss that has occurred on assets used in fulfilling the contract.

Reference to Conceptual Framework - Amendments to IFRS 3

Minor amendments were made to IFRS 3 *Business Combinations* to update the references to the 2018 Conceptual Framework for Financial Reporting in order to determine what constitutes an asset or liability in a business combination. In addition, the Board added a new exception in IFRS 3 for liabilities and contingent liabilities. The exception specifies that, for some types of liabilities and contingent liabilities, an entity applying IFRS 3 should instead refer *to* IAS 37 *Provisions, Contingent Liabilities and Contingent Assets*, or IFRIC 21 *Levies* rather than the 2018 Conceptual Framework. Without this new exception, an entity would have recognised some liabilities in a business combination that it would not recognise under

IAS 37. Therefore, immediately after the acquisition, the entity would have had to derecognise such liabilities and recognise a gain that did not depict an economic gain. The amendments also confirm that contingent assets should not be recognised at the acquisition date.

Annual Improvements to IFRS Standards 2018-2020

The following improvements were finalised in May 2020:

- IFRS *9 Financial Instruments* – clarifies which fees should be included in the 10% test for derecognition of financial liabilities. Costs or fees could be paid to either third parties or the lender. Under the amendment, costs or fees paid to third parties will not be included in the 10% test.
- IFRS 16 *Leases* – amendment of illustrative example 13 to remove the illustration of payments from the lessor relating to leasehold improvements, to remove any confusion about the treatment of lease incentives.
- IFRS 1 *First-time Adoption of International Financial Reporting Standards* – allows entities that have measured their assets and liabilities at carrying amounts recorded in their parent's books to also measure any cumulative translation differences using the amounts reported by the parent. This amendment will also apply to associates and joint ventures that have taken the same IFRS 1 exemption.

The above amendments to standards have been endorsed by the EU and are not expected to have a material impact on the Group's consolidated financial statements.

2.3.2. New standards, interpretations and amendments which will become effective after 2022

2.3.2.1. New standards effective after 2022 as issued by the IASB and adopted by the EU

The Group will apply IFRS 17 and IFRS 9 for the first time on 1 January 2023. Both standards will bring significant changes to the accounting for insurance and reinsurance contracts and financial instruments, with IFRS 17 expected to have a material impact on the Group's consolidated financial statements in the period of initial application.

- Transition to IFRS 17

IFRS 17 is an integrated standard for insurance contracts, compared to IFRS 4 which was published as an interim regulation that allowed entities to continue their accounting practices on insurance contracts and focuses on enhanced disclosures with respect to the value, the timing and the uncertainty of future cash flows arising from insurance contracts.

IFRS 17 establishes principles for the recognition, measurement, presentation and disclosure of insurance contracts and replaces IFRS 4. IFRS 17 will bring radical changes to the accounting treatment of insurance contracts for all insurance entities, including the Parent company and its subsidiaries. The accounting principles currently applied by the Group regarding insurance contracts under IFRS 4, are mainly based on accounting principles followed by local jurisdictions which were valid before the initiation of IFRS. The new IFRS 17 Standard introduces a General Measurement Model (GMM) for insurance contracts that is complemented by (a) the Variable Fee Approach (VFA) for portfolios of contracts with direct participation in investments that comprise of contracts linked with investments, and (b) the Premium Allocation Approach (PAA) for short term contracts (usually Non-Life insurance contracts).

The main characteristics of IFRS 17 are: i) the measurement of insurance liabilities in the Statement of Financial Position based on the present value of future cash flows with an explicit risk adjustment for non-financial risk (i.e. the fulfillment cash flows), ii) the recalculation of the fulfillment cash flows in each reporting period using current assumptions and discount rates, iii) the Contractual Service Margin (CSM) is recognized in the Statement of Financial Position and is equal to the unearned profit arising from the insurance contract and is then amortized in Profit or Loss for the remaining life of the portfolio, iv) certain changes in the insurance liability are adjusted with respect to the CSM and subsequently recognized in Profit or Loss for the remaining life of the portfolio, v) the effect of changes in the discount rates is recognized either in Profit or Loss or in Equity through Other Comprehensive Income (OCI), vi) the presentation of insurance revenue and insurance service expenses in the statement of comprehensive income is based on the concept of insurance services provided during the period; Additionally, the application of IFRS 17 will significantly impact presentation and disclosures for all insurance and reinsurance contracts, and will need to be applied retrospectively by adjusting the comparative figures. There are, however, certain transitional measures that can be applied.

It is further noted that the Group has not elected to apply the exemption adopted by the European Union in relation to paragraph 22 of the standard, whereby an entity shall not include contracts issued more than one year apart in the same group, to:

(a) groups of insurance contracts with direct participation features and groups of investment contracts with discretionary participation features and with cash flows that affect or are effected by cash flows to policyholders of other contracts;

(b) groups of insurance contracts that are managed across generations of contracts and that meet the conditions laid down in Article 77 bof Directive 2009/138/EC and have been approved by supervisory authorities.

Management is currently assessing the impact on transition to IFRS 17, however is not yet in a position to provide a reliable estimate.

A summary of the significant accounting policies, judgements and estimates that will be applied from transition to IFRS 17 are described below. It is noted that this assessment is subject to change as the Group is continuing to refine the new accounting processes, judgements, assumptions, estimation techniques and internal controls required for the application of IFRS 17 until its first financial statements on the date of initial application.

i. Identifying contracts in scope of IFRS 17

When identifying insurance contracts in the scope of IFRS 17, the Group will need to assess whether a set or series of contracts should be treated as one contract and whether embedded derivatives, investment components and goods and services components have to be separated and accounted for under another standard.

It is noted that the classification of DAF and endowment contracts will remain unchanged from the current framework.

ii. IFRS 17 Measurement Models

The three measurement models apply to Group's business as follows:

Model	Model Applicable Business
GMM	Whole and term life insurance contracts Deferred Annuities Endowment contracts in scope of IFRS 17 Guaranteed Unit – Linked contracts Longer duration non-life insurance contracts that do not meet PAA eligibility criteria Reinsurance contracts held which do not meet PAA eligibility assessment
VFA	Non-guaranteed Unit Linked contracts
PAA	Short duration non-life insurance contracts Short duration individual health and accident contracts Short duration group life and health contracts Longer duration non-life insurance contracts that meet PAA eligibility criteria Reinsurance contracts held which meet PAA eligibility assessment

The Group applies judgement when determining eligibility criteria for the VFA and PAA measurement models (see section below "choice of measurement model").

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 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. The key features of each measurement model are set out below.

General Measurement Model (GMM)

The GMM is the core IFRS 17 measurement model. The fulfilment cash flows comprise the present value of future cash flows within the boundary of the contract, discounted at current rates, and an explicit risk adjustment for non-financial risk.

At inception, a CSM is recognised for each new group of contracts which represents the unearned profit to be recognised over the coverage period of the contract. Except for reinsurance contracts held, losses on groups of contracts that are onerous at inception are recognised immediately.

The CSM is subsequently remeasured for changes in the fulfilment cash flows relating to non-financial risk, applying locked in financial assumptions. Interest is accreted on the CSM using the locked-in discount rate and the CSM is amortised over the coverage period of the contract. The coverage period is determined based on the service provided to customers including both insurance and investment services. Losses on groups of contracts that are profitable at inception but subsequently become onerous, are recognised immediately.

In contrast to insurance contracts, the CSM for groups of reinsurance contracts held can be an asset or liability. If reinsurance is in place when underlying groups of insurance contracts become onerous the reinsurance CSM recognised is adjusted to offset the gross losses arising. Where the net cost of purchasing reinsurance contracts held relates to events that occurred prior to purchase (for example adverse development cover) no CSM is recognised, and the net cost is recognised immediately in the income statement.

Variable Fee Approach (VFA)

The VFA is a modified approach to the GMM that is applied to groups of insurance and investment contracts with direct participating features which meet eligibility requirements that demonstrate they provide substantial investment related services to policyholders.

Fulfilment cash flows for VFA contracts comprise the obligation to pay policyholders an amount equal to the fair value of underlying items, less the variable fee for future service.

The variable fee includes the present value of the shareholders' share of the fair value of underlying items adjusted for cash flows that do not vary with those underlying items. The risk adjustment reflects the compensation for non-financial risk in relation to the variable fee only.

The CSM is subsequently remeasured for changes in the variable fee due to both financial and non-financial risks using current market discount rates. Consistent with the GMM, the CSM is recognised in profit or loss over the coverage period in line with the insurance and investment services provided to customers.

Premium Allocation Approach (PAA)

The PAA is a simplified measurement model which can be applied to all short duration contracts and to longer duration contracts that meet PAA eligibility criteria.

The LRC is measured as the amount of premium received net of acquisition cash flows, less the amount of premiums and acquisition cash flows that have been recognised in profit or loss over the expired portion of the coverage period. Premium receipts and acquisition cashflows are recognised in profit or loss over the life of the contract. This approach is similar to the Group's previous approach for measuring non-life insurance contracts under IFRS 4. If facts and circumstances indicate that a group of contracts may be onerous, the LRC is measured using GMM principles and losses for onerous contracts are recognised immediately in the income statement.

For most 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.

Choice of measurement model

VFA eligibility

The VFA eligibility assessment is performed for all participating products having long term contract boundaries. The Life business is considered eligible for the VFA measurement model where:

- Contractual terms evidence that policyholders participate in a pool of clearly identified underlying items;
- The policyholders expect to receive a substantial share of the returns on underlying items; and
- A substantial proportion of changes in amounts payable to policyholders varies with returns on the underlying items.

The Group’s non-guaranteed Unit – Linked contracts have been assessed as being eligible for the VFA measurement model.

Reinsurance contracts held are not eligible to apply the VFA model.

PAA eligibility

The majority of the Group’s direct non-life business has a duration of one year or less and is automatically eligible for the PAA measurement model. For the remaining business, the Group uses financial techniques in order to compare the value of the Liability for Remaining Coverage (LRC) measured under GMM and PAA. Where the LRC does not materially differ between the two measurement models (over the duration of the contract and under a base and stressed scenarios) the contract group is PAA eligible.

The Group has multiple non-life reinsurance contracts with an effective contact boundary of more than one year. These are assessed for PAA eligibility by applying the same approach as in primary insurance business.

iii. Contract Boundaries:

Insurance Contracts:

The boundary of an insurance contract determines the start and end points for the inclusion of cash flows for measurement purposes. 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 entity can compel the policyholder to pay the premiums or in which the entity has a substantive obligation to provide the policyholder with services.

A substantive obligation to provide insurance contract services ends when:

(a) the entity has the practical ability to reassess the risks of the particular policyholder and, as a result, can set a price or level of benefits that fully reflects those risks; or

(b) both of the following criteria are satisfied:

i. the entity has the practical ability to reassess the risks of the portfolio of insurance contracts that contains the contract and, as a result, can set a price or level of benefits that fully reflects the risk of that portfolio; and

ii. 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.

The Group assessed the contract boundaries of its insurance portfolio taking into account the terms of the contracts.

Under IFRS17 the health riders as well as life riders have been allocated to the same groups as their basic contracts.

Given that the Group does not have the practical ability to set a price or level of benefits that fully reflects the reassessed risks of the entire contract at each annual renewal period, the contract boundary is longer than a year. As a result, the cash flows of all riders attached to long term base contracts are projected over a long-term horizon, driven from the basic cover.

Reinsurance Contracts:

In assessing the contract boundary when the Group is the cedant there are two components that were analyzed:

(a) the Group has a substantive obligation to pay premiums in exchange for services (mirrored by the reinsurer having the right to compel the Group to pay premiums) or;

(b) the Group has a substantive right to receive services from the reinsurer (mirrored by the reinsurer having a substantive obligation to pay benefits to the Group).

Where items (a) and (b) result in a different contract boundary period the longer period applied.

In assessing a) and b) above, the Group considered any repricing and cancellability clauses embedded in the reinsurance contracts.

iv. Investment Component

The Group has assessed its products, for unbundling purposes, in which an investment component and/or an embedded derivative has been identified. Those mainly are products under the individual traditional life and Unit Linked business.

The Group has identified non-distinct investment components (NDIC) that will not be included in insurance revenue and insurance service expenses under IFRS 17. The identification and measurement of the NDIC of the contract is determined by the amount to be required to be paid by the policyholder in all scenarios with commercial substance. Such components have been identified in the traditional and unit linked business determined in most cases as the surrender value. In Non-Life insurance business no investment component has been identified.

v. Level of Aggregation

IFRS 17 introduces new unit of account requirements referred to in the Standard as the level of aggregation. Recognition and measurement requirements of IFRS 17 must be applied at this level of granularity. The level of aggregation requirements defined by IFRS 17 can be summarized into the following sequential levels of aggregation:

- portfolio level which includes all those contracts subject to similar risks and managed together as a single pool;
- a time bounded cohort level which should be no longer than 12 months and be part of a portfolio; and
- further division of the cohort into the following profitability groups of contracts:
  - A group of contracts that are onerous at initial recognition, if any;
  - A group of contracts that at initial recognition, have no significant possibility of becoming onerous in subsequent periods, if any; and
  - A group of remaining contracts in the portfolio, if any.

The above level of aggregation requirements apply to all measurement models. However, for contracts measured under the PAA, IFRS 17 permits a simplification whereby contract groups are assumed not to be onerous unless facts and circumstances indicate otherwise. The Group has determined a methodology which uses internal management information in order to identify facts and circumstances that may indicate that a group of contracts is onerous.

The Group has finalised the assessment of level of aggregation and the approach to profitability grouping. The latter is determined on a set of contracts which are sufficiently homogeneous, as opposed to an individual contract assessment.

Reinsurance contracts held are also subdivided into three profitability groups, determined by reference to net gains/losses on initial recognition, and comprising:

- contracts that have a net gain at initial recognition;
- contracts that have no significant possibility of a net gain arising subsequently; and
- all remaining contracts.

vi. Estimate of future cash flows (fulfillment cash flows)

The Standard defines the fulfilment cash flows as an explicit, unbiased and probability-weighted estimate (i.e. expected value) of the present value of the future cash inflows minus the present value of the future cash outflows that will arise as the Group fulfils insurance contracts, including a risk adjustment for non-financial risk.

The estimate of future cash flows is assessed at the level of profitability groups and it allows for all the cash inflows and outflows expected to occur within the contract boundary. Expenses must be directly attributable to fulfilling insurance contracts, including an allocation of overheads to the extent that they can be allocated to groups of contracts on a reasonable and consistent manner.

Cash flows are modelled separately for gross and reinsurance contracts.

vii. Financial assumptions - Discount Rates

Discounting is applied to the estimate of future cash flows. The Group has developed a methodology to derive the required discounting curve of its life and non - life portfolio, including reinsurance. A separate yield curve will be determined for each one of the three measurement methods (GMM, PAA, and VFA). The requirement of the standard to measure liabilities for insurance contracts using current rates will be a significant change from the Group's current practice.

For groups of contracts measured under VFA (such as non-guaranteed unit-linked), the Group will use EIOPA's risk free discounting curve driven primarily by the nature and their higher liquidity profile.

For groups of contracts under GMM and PAA, the methodology developed is a bottom up approach which aims to calculate an illiquidity premium over EIOPA's risk free yield curve which is readily available. The methodology to estimate the illiquidity premium takes into account the market yields of bonds within a reference portfolio, which includes government and corporate bonds and has similar features to the Group's insurance obligations. The reference asset portfolio is a mix of the Group's own financial instrument portfolio and financial instruments from the market that fulfill specific criteria and have a similar duration to the liabilities discounted.

Presentation of financial assumption changes

Under IFRS 17, changes in the carrying amounts of groups of contracts arising from the effects of the time value of money, financial risk and changes therein are generally presented as insurance finance income or expenses.

Changes in financial assumptions can be presented in the income statement or in the statement of comprehensive income as a matter of accounting policy choice. The Group has elected to recognize the impact of such changes in other comprehensive income, consistent with the approach to the presentation of fair value movements of assets measured under IFRS 9, therefore eliminating accounting mismatches. For contracts measured under VFA, the impact of financial assumption changes flows in the income statement in line with the fair value movements of the related assets.

viii. Risk Adjustment

The risk adjustment for non-financial risk represents the compensation that the Group requires for bearing the uncertainty about the amount and timing of the cash flows arising from insurance risk and other non-financial risks such as lapse risk and expense risk.

It measures the degree of variability of expected future cash flows and the Group-specific price for bearing that risk and reflects the degree of the Group's risk aversion. The Group determines the risk adjustment for non-financial risk at the entity level and then allocates it to all groups of insurance contracts.

The Group has estimated the risk adjustment with the Value at Risk method calibrated using the Solvency II standard formula and has not chosen to disaggregate the change in risk adjustment for non-financial and financial risk. As a result, the entire change will be included in the insurance service result.

ix. Contractual Service Margin

The contractual service margin is a component of the carrying amount of the liability for a group of insurance contracts representing the unearned profit at inception, and recognized in the income statement over the life of contract as insurance and investment related services are provided to the customer. The amount of CSM amortization recognized in profit or loss each year is determined by considering, for each group of contracts, coverage units that reflect the quantity of the benefits provided in each period and the expected coverage period. The coverage units, used amongst the Group's significant portfolio categories, are based on sum insured and account value, where applicable.

x. IFRS 17 transition approach

Changes in accounting policies resulting from the implementation of IFRS 17 must be applied using the Fully Retrospective Approach (FRA) where practicable, calculating the CSM at the date of transition, as if the standard had always applied. Where FRA is not practicable for a particular group of insurance contracts there is a choice to apply the Modified Retrospective Approach (MRA) to the extent that reasonable and supportable information exists, or the Fair Value Approach (FVA). Under the FVA, the CSM recognized at the transition date is determined as the difference between the fair value of a group of insurance contracts, measured in accordance with IFRS 13, 'Fair Value Measurement' and the fulfilment cash flows. Unlike the FRA and MRA, no transition information is required to calculate the FVA CSM.

Considering the above transition requirements relating to the quality of information and absence of hindsight in financial and no financial assumptions, the Group has determined the following approaches on transition to IFRS 17:

- For non-life and Group Life and Health business in scope of the PAA, the FRA will be used.
- For Individual Life Business the FRA will be used for business written from 1.1.2016; for business written prior to 2016 the FVA will be used instead, due to data availability constraints.

For business transitioning under the FVA, the Group has taken advantage of the simplification permitting contracts in different annual cohorts to be placed into a single group of contracts.

- IFRS 9 "Financial instruments"

IFRS 9 replaces IAS 39 Financial instruments *Recognition and Measurement* for annual periods beginning on or after 1 January 2018. However, the Group has met the relevant criteria and elected to apply the temporary exemption from IFRS 9, thereby deferring the initial application date to IFRS 9 to align with that of IFRS 17 for annual reporting periods beginning on or after 1 January 2023.

Financial assets – classification and measurement

IFRS 9 establishes a new classification and measurement approach for all types of f financial assets that reflects the way in which the assets are managed to generate cash flows (the entity's business model) and their contractual cash flow characteristics (whether the cash flows represent 'solely payments of principal and interest" – the so-called 'SPPI' test). IFRS 9 introduces three principal classification and measurement categories for financial assets – amortised cost (AC), fair value through other comprehensive income (FVOCI) and fair value through profit or loss (FVTPL) – and eliminates the previous IAS 39 categories of held-to-maturity investments, loans and receivables, and available-for-sale financial assets.

A financial asset is measured at amortised cost if (1) 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), (2) it is held within a business model whose objective is to hold assets to collect contractual cash flows, and (3) it is not irrevocably designated on initial recognition as measured at FVTPL.

A financial asset is measured at FVOCI if (1) it passes the SPPI test), (2) is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets, and (3) it is not irrevocably designated on initial recognition as measured at FVTPL.

All financial assets not classified as measured at AC or FVOCI, as described above, are measured at FVTPL. In addition, on initial recognition the Group may irrevocably designate a financial asset that otherwise meets the requirements to be measured at AC or FVOCI as measured at FVTPL if doing so eliminates or significantly reduces an accounting mismatch. The election is made on an investment-by-investment basis.

What is more, on initial recognition of an equity investment that is not held for trading, the Group may irrevocably elect to present subsequent changes in fair value in OCI. The election is made on an instrument-by-instrument basis.

Under IFRS 9, derivatives embedded in contracts where the host is a financial asset in the scope of IFRS 9 are no longer separated. Instead, the hybrid financial instrument as a whole is assessed for classification. This is in contrast to IAS 39, whereby derivatives were 'bifurcated' from the host contract and were accounted for separately.

Business model assessment

The objective of the business model assessment is to classify financial assets based on how the Group manages them in order to generate cash flows – by collecting contractual cash flows (held to collect), selling financial assets or both (held to collect and sell). Under IFRS 9, 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 Group is managed and information is provided to management.

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

In carrying out the assessment on the determination of its business model, the Group considers a number of factors including:

- the stated policies and objectives of each portfolio of assets;
- how the performance of each portfolio is evaluated and reported to key management personnel;
- how risks are associated with the performance of the business model and how those risks are managed;
- the risks associated with the performance of the business model; and
- the frequency, value and timing of sales in prior periods, the reason for those sales and the expectations about future sales activity.

Contractual cash flows characteristics assessment (SPPI assessment)

The transition requirements of IFRS 9 necessitate a complete review by the Group of its asset portfolio by analyzing the contractual features in order to determine whether the contractual cash flows are solely payments of principal and interest on the principal amount outstanding (the so-called SPPI test).

The SPPI assessment reflects the IASB's objective to develop a classification and measurement model under which only 'plain vanilla' debt instruments (loans, bonds, trade receivables, term deposits) would qualify for measurement at amortised cost. In other words, the Board's intention is to identify financial assets with simple cash flows that represent a basic lending-type return for which amortised cost would be able to provide useful information by allocating those cash flows over time.

In such a basic lending-type relationship, the lender or holder of the financial asset is looking to earn a return that compensates him 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, IFRS 9 acknowledges that 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 fair value through profit or loss.

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 for which amortised cost cannot provide useful information by allocating the return over time.

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.

Assessment of changes to the classification upon transition to IFRS 9

The Group is carrying out a business model assessment of its investment portfolio and a detailed review of the contractual terms (SPPI review) for its debt instruments to determine any potential changes to the classification and measurement. The assessment is being performed based on the facts and circumstances that exist at the date of initial application i.e. 1 January 2023. IFRS 9 will affect the classification and measurement of financial assets as follows:

- Debt investments that are classified as available-for-sale under IAS 39 may under IFRS 9 be measured at FVOCI, FVTPL or amortised cost depending on the particular circumstances.
- Bonds held to maturity that under IAS 39 are classified into loans and receivables and measured at amortised cost, under IFRS 9 are to be reclassified and measured at FVTPL.
- Loan receivables measured at amortised cost under IAS 39 are also expected to be measured at amortised cost under IFRS 9.
- Trading securities, derivative assets, mutual funds and unit-linked assets that are measured at FVTPL under IAS 39, they will also be measured at FVTPL under IFRS 9.
- Mutual funds that are classified as available-for-sale under IAS 39, they will be measured at FVTPL under IFRS 9.
- Equity investments that are classified as available-for-sale under IAS 39 will be measured at FVTPL under IFRS 9. However, those equity investments held for long-term strategic purposes will be designated at FVOCI on 1 January 2023; consequently, all fair value gains and losses will be reported in OCI, no impairment losses will be recognised in profit or loss, and no gains or losses will be reclassified to profit or loss on disposal of these investments. Income from dividends will continue to be recognised in profit or loss.

Financial assets - impairment

IFRS 9 introduces a revised impairment model which changes the basis of loss calculation to expected loss by incorporating forward looking information, as opposed to the incurred loss model under IAS 39, which focused only on losses that had already occurred.

The objective of the model in IFRS 9 is to be responsive to changes in credit risk and economic conditions and distinguish between financial instruments for which credit risk has increased significantly since initial recognition and those for which it has not. The model requires entities to recognise expected credit losses at all times and to update the amount of expected credit losses recognised at each reporting date to reflect changes in the credit risk.

The new impairment requirements will apply to the Group's financial assets measured at amortised cost, debt instruments at FVOCI as well as to trade receivables and term deposits. At initial recognition, an impairment allowance is required for expected credit losses ('ECL') resulting from default events that are possible within the next 12 months ('12-month ECL').

In the event of a significant increase in credit risk (SICR), an allowance is required for ECL resulting from all possible default events over the expected life of the financial instrument ('lifetime ECL').

Financial assets where 12-month ECL are recognised are in 'stage 1'; financial assets that are considered to have experienced a significant increase in credit risk are in 'stage 2', while financial assets that are considered to be in default or otherwise credit-impaired are in 'stage 3'.

The model is dynamic in that transfers from one stage to another take place when there is a significant change in the credit quality of a financial asset. Thus, where the criteria for stage 2 classification are no longer met following a significant improvement in the credit risk, the financial asset will be reclassified to stage 1. What is more, subsequent transfers from stage 3 to stage 2 will take place when the financial asset ceased to be credit-impaired based on the assessment of SICR.

The assessment of credit risk and the estimation of ECL are required to be unbiased and probability-weighted, and should incorporate all available information relevant to the assessment, including information about past events, current conditions and reasonable and supportable forecasts of economic conditions at the reporting date. In addition, the estimation of ECL should take into account the time value of money. In this respect, credit losses are measured at the present value of all cash shortfalls (i.e., the difference between the cash flows due to the Group in accordance with the contract and the cash flows that the Group expects to receive).

The key inputs into the measurement of ECL are the term structures of the PD, LGD and EAD (Probability of Default – Loss Given Default – Exposure at Default). ECL for financial assets for which credit risk has significantly increased are calculated by multiplying the 12-month PD by the respective LGD and EAD. Lifetime ECL are calculated by multiplying the lifetime PD by the respective LGD and EAD.

The impairment requirements are complex and require management judgements, estimates and assumptions. As a result, the recognition and measurement of impairment is intended to be more forward-looking than under IAS 39, and the resulting impairment charge may be more volatile.

Financial liabilities

IFRS 9 retains most of the requirements in IAS 39 for the classification and measurement of financial liabilities. However, under IAS 39 all fair value changes of financial liabilities designated at FVTPL are recognised at profit or loss, whereas under IFRS 9 these fair value changes will be presented as follows:

- The amount of change in the fair value that is attributable to changes in the credit risk of the liability will be presented in OCI.
- The remaining amount of the change in the fair value will be presented in profit or loss.

Hedge accounting

IFRS 9 includes a new general hedge accounting model that aims to simplify hedge accounting, creating a stronger link with risk management strategy and permitting hedge accounting to be applied to a greater variety of hedging instruments and risks. When initially applying IFRS 9, the Group may choose as its accounting policy to continue to apply the hedge accounting requirements in IAS 39 instead of the requirements in IFRS 9. As a result, the Group intends to elect to continue applying IAS 39.

Comparative information on transition

As permitted by the transitional provisions of IFRS 9, the Group intends not to restate comparative figures. As a result, the classification and measurement and impairment requirements are to be applied retrospectively by adjusting the opening balance sheet at the date of initial application.

IFRS 9 Implementation Programme

The Group is currently continuing with the implementation of the IFRS 9 Programme, progressing further towards achieving key milestones across all work streams. In particular, the Group has completed the first of the two pillars of the standard, namely the classification of its investment portfolio, having carried out the business model assessment and assessed the contractual cash flow characteristics of the financial assets that compose its portfolio in order to determine whether they are consistent with the SPPI criterion.

As far as the second pillar is concerned, the new impairment requirements, the Group is in the process of developing draft IFRS 9 accounting policies, key processes and process flows and the ECL methodologies.

Estimated impact on adoption of IFRS 9

Management is not yet in a position to estimate reliably the expected impact, since the Group is in the process of finalizing models, assembling data and calibrating the impairment stage transfer criteria. As a result, the Group will disclose the transition impact in its financial statements for the year-ending 31 December 2023.

2.3.2.2. Amendments and interpretations to published standards not yet adopted by the Group

The following amendments to existing standards as issued by the IASB are not yet effective and are not expected to have a material impact on the Group's consolidated financial statements.

Amendments to IAS 1 Presentation of Financial Statements and IFRS Practice Statement 2: Disclosure of Accounting policies
Issued by IASB in 2021. The amendments are effective for annual reporting periods on or after 1 January 2023 and have been endorsed by the EU.

Amendments to IAS 12 Income taxes: Deferred tax related to assets and liabilities arising from a single transaction
Issued by the IASB in May 2021. The amendments are effective for annual reporting beginning on or after 1 January 2023 and have been endorsed by the EU.

Amendments to IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates
Issued by IASB in February 2021. The amendments are effective for annual reporting periods on or after 1 January 2023 and have been endorsed by the EU.

Amendments to IAS 1 Presentation of Financial Statements: Classification of Liabilities as Current or Noncurrent
Issued by IASB in January 2020. The amendments are effective for annual reporting periods on or after 1 January 2024 and have not yet been endorsed by the EU.

Amendments to IAS 1 Presentation of Financial Statements: Non-current liabilities with covenants
Issued by IASB in October 2022. The amendments are effective for annual reporting periods on or after 1 January 2024 and have not yet been endorsed by the EU.

Amendments to IFRS 16 Leases: Lease liability in a sale and leaseback
Issued by IASB in September 2022. The amendments are effective for annual reporting periods on or after 1 January 2024 and have not yet been endorsed by the EU.

2.4 Consolidated Financial Statements

2.4.1 Basis of consolidation

The consolidated financial statements incorporate the separate financial statements of the Parent Company and its subsidiaries, which are entities controlled by the Parent Company. Control is achieved, if and only if, the Parent Company has a) power over the subsidiaries b) exposure, or rights to variable returns from its involvement with the subsidiaries and c) the ability to use its power over the subsidiaries to affect the amount of its returns.

Income and expenses of subsidiaries during the year are included in the consolidated statement of total comprehensive income from the effective date of acquisition and up to the effective date of disposal, as appropriate. Profit / (loss) for the period and total comprehensive income / (expense) of subsidiaries is attributed to the shareholders of the Parent Company and to the non-controlling interests even if this results in the non-controlling interests having a deficit balance.

When necessary, adjustments are made to the financial statements of subsidiaries to align their accounting policies with those of the Group companies.

All intra-group transactions, balances, income and expenses are eliminated upon consolidation.

2.4.2 Non-controlling interests

Non-controlling interests may be initially measured either at fair value or at the non-controlling interests' proportionate share of the recognised amounts of the acquiree's identifiable net assets. The choice of measurement basis is made on a transaction-by-transaction basis. Subsequent to acquisition, the carrying amount of non-controlling interests is the amount of those interests at initial recognition plus the non-controlling interests' share of subsequent changes in equity. Total comprehensive income is attributed to non-controlling interests even if this results in the non-controlling interests having a deficit balance.

2.4.3 Changes in the Group's ownership interests in subsidiaries that do not result in loss of control

Changes in the Group's ownership interests in a subsidiary that do not result in the Group losing control over the subsidiaries are accounted for as equity transactions.

The carrying amounts of the Parent Company's interests and the non-controlling interests are adjusted to reflect the changes in their relative interests in the subsidiaries. Any difference between the amount by which the non-controlling interests are adjusted and the fair value of the consideration paid or received is recognised directly in equity and attributed to owners of the Parent Company.

2.4.4 Loss of control

When the Group loses control of a subsidiary, the profit or loss on disposal is calculated as the difference between (i) the aggregate of the fair value of the consideration received and the fair value of any retained interest and (ii) the previous carrying amount of the assets (including goodwill), and liabilities of the subsidiary and any non-controlling interests. Any unrealized gains or losses previously recognised within other comprehensive income which result from the measurement of the assets of the subsidiary carried at fair value are accounted for as if the Parent Company had directly disposed of the relevant assets (i.e. reclassified to profit or loss or are transferred directly to retained earnings as specified by applicable IFRSs).

The fair value of any investment retained in the former subsidiary at the date when control is lost is regarded as the fair value on initial recognition for subsequent accounting under IAS 39 or, when applicable, the cost on initial recognition of an investment in an associate or a jointly controlled entity.

2.4.5 Contribution of assets to subsidiary in exchange for shares of the subsidiary

When the Parent Company transfers property and equipment, intangible assets or investment property to an existing or new subsidiary in exchange for shares in the subsidiary, the Parent Company recognizes in the separate financial statements the carrying value of the transferred asset as investment in subsidiaries. Such transactions do not affect the consolidated financial statements.

2.4.6 Associates

Associates are entities over which the Group has significant influence, but which it does not exercise control over it. If the Group holds, directly or indirectly, 20% or more of the voting power of the investee, it is presumed that the Group has significant influence, unless it can be clearly demonstrated that this is not the case. Investments in associates are accounted for by applying the equity method of accounting.

Under the equity method of accounting, the investment is initially recorded at cost. Goodwill arising on the acquisition of an associate is included in the carrying amount of the investment (net of any accumulated impairment loss – if any). The carrying amount of the investment is increased or decreased by the proportionate share of the associate's post-acquisition profits or losses (recognised in the Group's profit or loss) and movements in reserves (recognised in other comprehensive income). Dividends received from the associate during the year reduce the carrying value of the investment. Investments in associates for which significant influence is intended to be temporary because such investments are acquired and held exclusively with a view to their subsequent disposal within twelve months from their acquisition, are recorded as "assets held for sale". Unrealized gains on transactions between the Group and its associates are eliminated to the extent of the Group's interest in the associate. Unrealized losses are also eliminated but considered as an impairment indicator of the asset transferred. Where necessary, the associate's financial statements used in applying the equity method are adjusted to ensure consistency with the accounting policies adopted by the Group.

2.4.7 Joint arrangements

A joint arrangement is an arrangement of which two or more parties have joint control. A joint arrangement has the following characteristics:

(a) The parties are bound by a contractual arrangement; and

(b) The contractual arrangement gives two or more of those parties joint control of the arrangement.

Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require the unanimous consent of the parties sharing control.

A joint arrangement is either a joint operation or a joint venture.

A joint operation is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the assets, and obligations for the liabilities, relating to the arrangement. Those parties are called joint operators. A joint venture is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the arrangement. Those parties are called joint venturers.

The Parent Company determines the type of joint arrangement in which it is involved and classifies the joint arrangement as a joint operation or a joint venture depending upon the rights and obligations of the parties to the arrangement.

In case of a joint operator the Parent Company recognizes:

a) its assets, including its share of any assets held jointly, b) its liabilities, including its share of any liabilities incurred jointly, c) its revenue from the sale of its share of the output arising from the joint operation d) its share of the revenue from the sale of the output by the joint operation and e) its expenses, including its share of any expenses incurred jointly.

In case of a joint venture the Parent Company recognizes its interest in a joint venture as an investment and accounts for that investment using the equity method (See Note 2.4.6 Associates above).

2.4.8 Investments in subsidiaries, associates and joint ventures in individual Financial Statements

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

2.4.9 Impairment assessment of goodwill and investments in subsidiaries, associates and joint ventures in the separate Financial Statements

At each reporting date, the Group and the Parent 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 Group 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.

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 Group, liabilities assumed by the Group from the former owners of the acquiree and the equity interests issued by the Group in exchange for control of the acquiree. Acquisition-related costs are generally recognised in profit or loss as incurred.

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

- deferred tax assets or liabilities and liabilities or assets related to employee benefit arrangements are recognised 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 Group 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 (a) of 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) (b) over 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 recognised immediately in profit or loss.

2.5.3 Contingent consideration

When the consideration transferred by the Group 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 IAS 39 or a non-financial asset or liability, is remeasured, at fair value at each subsequent reporting date and the changes in fair value are recognised in profit or loss.

2.5.4 Business combination achieved in stages

When a business combination is achieved in stages, the Group's previously held equity interest in the acquiree is remeasured to fair value at the acquisition date (i.e. the date when the Group obtains control) and the resulting gain or loss, if any, is recognised in profit or loss. Amounts arising from interests in the acquiree prior to the acquisition date that have previously been recognised 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 Group 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 recognised, to reflect new information obtained about facts and circumstances that existed at the acquisition date that, if known, would have affected the amounts recognised at that date.

2.6 Foreign currency translations

Items included in the Financial Statements of each entity of the Group 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 consolidated Financial Statements of the Group are presented in thousands of Euro (€), which is the functional currency of the Parent 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 recognised in profit or loss, except when deferred in 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 recognised 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 recognised 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 recognised 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 assets and liabilities at fair value through profit or loss

This category has the following two sub-categories:

- Trading and
- Financial assets and liabilities designated at fair value through profit or loss

2.7.1 Trading portfolio

The trading category includes financial assets, which are either acquired for generating a profit from short-term fluctuations in price or dealer's margins, or are included in a portfolio in which a pattern of short-term profit making exists, and derivatives unless they are designated as and are effective hedging instruments.

Trading securities may also include financial assets sold under sale and repurchase agreements (see Note 2.13).

2.7.2 Financial assets and liabilities designated as at fair value through profit or loss

The Group designates at initial recognition certain financial assets or liabilities as at fair value through profit or loss when:

a. Doing so eliminates or significantly reduces a measurement or recognition inconsistency (sometimes referred to as "an accounting mismatch") that would otherwise arise if the related derivatives were treated as held for trading and the underlying financial instruments were carried at amortised cost such as loans and advances to policyholders and debt securities in issue;

b. A group of financial assets, financial liabilities or both is managed and its performance is measured on a fair value basis, in accordance with a documented risk management or investment strategy, and information about the group of financial assets is provided internally on that basis to the Group's key management, for example the Board of Directors and Chief Executive Officer;

c. The financial instruments contain one or more embedded derivatives that significantly modify the cash flows resulting from those financial instruments and would have to be separated if not in this category.

The fair value designation, once made, is irrevocable.

2.7.3 Measurement

Financial assets and liabilities at fair value through profit or loss (both trading and designated) are initially recognised at fair value and subsequently measured at fair value.

Gains and losses realized on disposal or redemption and unrealized gains and losses from changes in the fair value are recognised in "Realized gains/(losses) from investments" and "Unrealized gains/(losses) from investments" within profit or loss.

Dividend income is recognised in profit or loss when the right to receive payment is established. This is the ex-dividend date for equity securities and is separately reported and included in "Other income / (expense)".

The amount of change during the period, and cumulatively, in the fair values of designated financial liabilities and loans and receivables that is attributable to changes in their credit risk is calculated as the amount of change in the fair value that is not attributable to changes in market conditions which subsequently increase market risk.

2.8 Investment securities

2.8.1 Initial recognition

Investment securities are initially recognized at fair value (including transaction costs) and are classified as:

- Available for sale
- Held-to-maturity
- Loans-and-receivables

based on the securities' characteristics and management intention on purchase date. Investment securities are recognized on the trade date, which is the date that the Group commits to purchase or sell the asset. All other purchases and sales, which do not fall within market convention, are recognized as derivative forward transactions until settlement.

2.8.2 Subsequent recognition

Available-for-sale investment securities are measured subsequent to initial recognition at fair value. Unquoted equity instruments whose fair value cannot be reliably estimated are carried at cost. Unrealized gains and losses arising from changes in the fair value of available-for-sale investment securities are reported in other comprehensive income, net of taxes (where applicable), until such investment are sold, collected or otherwise disposed of, or until such investments are determined to be impaired.

Available-for-sale investment securities may be sold in response to needs for liquidity or changes in interest rates, foreign exchange rates or equity prices. When an available-for-sale investment securities are disposed of or impaired, the accumulated unrealized gain or loss included in other comprehensive income is transferred to profit or loss for the period and reported as gains / losses from investment securities. Gains and losses on disposal are determined using the moving average cost method.

Held-to-maturity investment securities consist of non-derivative, securities that are quoted in an active market, with fixed or determinable payments and fixed maturity, which the management has the positive intent and ability to hold to maturity.

Investment securities classified as **loans and receivables** consist of non-derivative investment securities with fixed or determinable payments that are not quoted in an active market.

Investment securities classified as held-to-maturity or Loan and receivables are carried at amortised cost using the effective interest rate method, less any provision for impairment. Amortised cost is calculated by taking into account any fees, points paid or received, transaction costs and any discount or premium on acquisition.

Impairment: The Group assesses at each reporting date whether there is objective evidence that an investment security or a group of such securities is impaired.

In particular for equity investments classified as available-for-sale, a significant or prolonged decline in the fair value of the security below its cost is considered in determining whether the assets are impaired.

If any objective evidence of impairment exists for available-for-sale financial assets, the cumulative loss (measured as the difference between the acquisition cost and the current fair value, less any impairment loss on that financial asset previously recognised in profit or loss) is removed from other comprehensive income and recognised in profit or loss. Impairment losses recognised in profit or loss on equity instruments are not reversed through profit or loss. If, in a subsequent period, the fair value of a debt instrument classified as available-for-sale increases and the increase can be objectively related to an event occurring after the impairment loss was recognised in profit or loss, the impairment loss is reversed through profit or loss.

The amount of the impairment loss for held-to-maturity investment securities and investment securities classified as loans and receivables, which are carried at amortised cost is calculated as the difference between the asset's carrying amount and the present value of expected future cash flows discounted at the financial instruments' original effective interest rate.

Interest earned on investment securities is reported as "interest income".

Dividend income is recognised when the right to receive payment is established (the ex-dividend date) for equity securities and is separately reported and included within "Net other income/ (expense)".

2.9 Reclassification of financial instruments

The Group reclassifies non-derivative debt instruments out of the trading and available-for-sale categories into the loans and receivables category, if the instruments meet the definition of this category at the date of reclassification and the Group has the positive intention and ability to hold the instruments for the foreseeable future or until maturity.

When rare circumstances cause significant deterioration in the trading activity or substantially affect the observable prices of non-derivative financial assets classified in the trading category, the Group reclassifies such financial assets out of the trading category and into the held-to-maturity or available-for-sale categories, provided the assets meet definition of the respective category at the date of reclassification and the Group does not have the intention to sell them in the near term. Such reclassifications can occur only once in response to a single rare event.

If there is a change in intention or ability to hold a debt financial instrument to maturity, the Group reclassifies such instruments out of the available-for-sale category and into the held-to-maturity category, provided the instruments meet the definition of the latter at the date of reclassification.

For financial assets reclassified as described above, the fair value at the date of reclassification becomes the new amortized cost at that date.

When the instruments reclassified out of the trading category include embedded derivatives, the Group reassesses at the reclassification date, whether the embedded derivatives need to be separated from the host contract, on the basis of the circumstances that existed when the Group became a party to the contract.

The Group transfers debt instruments that have been reclassified as loans-and-receivables to the available-for-sale category if the instruments subsequently become quoted in an active market and the Group does not intend to hold them for the foreseeable future or until maturity. The fair value of the instruments at the date of reclassification becomes the new amortised cost at that date. The difference between the amortised cost immediately prior to reclassification and the fair value at the date of reclassification is recognized in the available-for-sale securities reserve through other comprehensive income and is amortised in profit and loss statement.

In the event that the Group disposes a significant amount of debt instruments from the Held-to-maturity category then, according to the provisions of IAS 39, it reclassifies all securities included in this category to the Available-for-sale category and the entity will be prohibited from classifying any financial asset as Held-to-maturity for two years after the occurrence of this event ("tainting rule"). Reclassified debt instruments are measured at fair value and the difference with amortized cost is recognized in the available-for-sale reserve.

2.10 Fair value of financial instruments

The Group measures the fair value of its financial instruments based on a framework for measuring fair value that categorises 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.

2.11 Insurance operations

IFRS 4 Implementation: The Group and the Parent Company adopted IFRS 4 as of 1 January 2005. On this date, the Parent Company's issued contracts were classified as either insurance or investment contracts.

2.11.1 Contract classification

2.11.1.1 Insurance contracts

Insurance contracts are classified under two categories, i.e. Life and non-life insurance contracts, depending on the nature of the insurance risk. It is noted that insurance products also include contracts involving both insurance and financial risk, as the Group considers that such contracts contain significant insurance risk.

2.11.1.1.1 Life insurance contracts

These contracts mainly insure events over a long period of time. Premiums (including policy fees) are calculated on a pro-rata basis over the contract term and are presented gross of commissions.

Existing contracts do not contain embedded derivatives.

2.11.1.1.1.1 Traditional insurance contracts

This category includes contracts issued by the Group against risk of death, whole-life benefits, annuities, disability, accident and sickness on an individual as well as a group basis.

Life Insurance Contracts with profit participation features:

The majority of traditional life-insurance contracts incorporate a profit participation formula. These contracts provide the policyholder with additional benefits to those guaranteed by the insurance contract.

Life Insurance Contracts without profit participation features:

A small percentage of total life insurance contracts do not include profit participation features.

2.11.1.1.1.2 Unit-Linked Life insurance

Unit-Linked Life insurance contracts transfer the financial risk to the policyholder, while the Group guarantees part of the financial risk at maturity of the contracts, which also contain insurance risk (mortality, disability).

2.11.1.1.2 Non-life insurance contracts

Non-life insurance contract premiums are recognised as revenue (earned premiums and policy fees) on a pro rata basis over the related contract term and reported gross of related commissions. At each reporting date, the amount of recorded premiums corresponding to future periods is transferred to the unearned premium reserve.

Existing contracts do not contain embedded derivatives. *Non-Life Insurance contracts –Motor third party liability ("TPL"): This category includes contracts covering Motor TPL risk.*

Non-life insurance contracts – Property Insurance: This category includes contracts covering fire, earthquake and theft risk.

Non-life insurance contracts – Other Non-life Insurance: This category includes contracts covering risk of land motor own damage, cargo, civil liability, credit, guarantee, assistance, marine hull, marine crew and other.

2.11.1.2 Investment contracts

Investment contracts are defined as those contracts which are not classified as insurance contracts.

Deposit Administration Funds (DAF): These are group contracts where an investment administration insurance is agreed, according to which a benefit is provided to the contract-holder either when the individual ceases to be a member of the group contract for any reason whatsoever or when reaching a certain age. The Group pays out benefits to the extent that the fund suffices. In case of insufficiency of the fund, the beneficiary shall not raise any claim against the Group. DAF are managed either by the Group at its own discretion or following instructions of the policyholders or by the policyholders themselves. The Group's responsibility ends when the fund account is exhausted, even if the fund administration agreement has expired earlier than that.

Endowment contracts with premium return in case of death: These are individual contracts, where the policyholder receives a lump sum at the end of the insurance period, resulting from the compounded interest of paid premiums with a guaranteed interest rate. In case of death of the policyholder, the benefit paid is equal to the paid premiums. Endowment contracts that are classified as investment are those contracts which do not include riders.

Unit-Linked Investment contracts: These are contracts without guarantees and without riders where the policyholder bears the investment risk.

Liabilities from group investment contracts and endowment contracts are measured at amortized cost, while liabilities from Unit-Linked investment contracts are measured at the fair value of the underlying assets and are recorded in "Investment contract liabilities" with the guaranteed returns recorded in "Returns attributable to investment contract holders". Investment contract liabilities are presented net of deferred acquisition costs (DAC).

2.11.1.3 Unbundling of deposit component

The Group and the Parent Company separate the deposit component from non-guaranteed Unit-Linked contracts which have been classified as insurance contracts due to the additional coverages that they include. The deposit component is measured at amortized cost and is recorded in "Investment contract liabilities" and the guaranteed returns in "Returns attributable to investment contract holders**".**

2.11.2 Deferred acquisition costs (DAC)

Commissions and other acquisition costs incurred during the financial period for the issuance of new insurance contracts and /or renewal of existing insurance contracts, but which are related to subsequent financial periods are recognised in assets as "Deferred acquisition costs (DAC)" and are amortized over the life of the insurance contract. Deferred acquisition costs of investment contracts are recorded in liabilities, net of "Investment contracts liabilities".

Life insurance:

Commissions and other acquisition costs relating to the issuance of new contracts and /or renewal of existing contracts are capitalized and recognized in assets. All other costs are recognized as an expense when incurred. DAC are amortized over the life of the insurance contract as follows:

- For long-term life insurance, DAC amortization follows earned income based on the corresponding assumptions used to estimate the liability for future contract benefits.
- For short-term life insurance, DAC are amortized in proportion to the earned premiums.

Non-life insurance:

Commissions and other acquisition costs incurred during the financial period for issuing new contracts and /or renewing existing contracts are recognised as DAC and are amortized in proportion to earned premiums. All other costs are recognized as an expense when incurred.

2.11.3 Insurance reserves

Insurance reserves represent the Group's estimates for liabilities stemming from insurance contracts.

Insurance reserve estimates are determined at the reporting date of the Financial Statements, in accordance with the prescribed principles and valuation rules per category of insurance reserves. Insurance reserves are calculated in accordance with the provisions of IFRS 4 "Insurance Contracts".

Changes in insurance reserves due to differences between current and past valuations in connection with retentions for the Group's own accounts are presented in profit or loss, being reduced by the reinsurer's' share in reserves in accordance with the reinsurance contracts.

The main categories of insurance reserves are set out below:

Mathematical reserve: include the reserves of life insurance contracts which are calculated as the difference at reporting date between the actuarial present value of future liabilities that have been assumed by the insurance company (including the profit participation reserve) and the actuarial present value of net premiums due by the policyholder and payable to the insurance company within the following years. Calculations are carried out in line with actuarial methods and local regulatory requirements. For single premium long-term life insurance contracts an additional provision for future management expenses is made.

Profit Participation Reserve**:** This reserve includes amounts intended for the policyholders, counterparties or the beneficiaries of insurance contracts in the form participation in technical profits, returns and refunds under the terms of the insurance contracts.

Unearned premium reserve: Represents the ratio of net written premiums that relate to future periods for the contracts that are in force at the reporting date.

Unexpired risk reserve: is the additional reserve created at each reporting date when the unearned premium reserve is not considered sufficient to cover the forecasted claims and expenses of the in force contracts.

Outstanding claims reserve: consist of the file by file provisions and the actuarially estimated additional amounts to cover the possible inadequacy of these provisions, the cost of not reported (IBNR) claims and the associated claims handling expenses. The ultimate cost of outstanding claims is estimated by using a range of standard actuarial claims projection techniques, such as Chain Ladder and Bornheutter-Ferguson methods. The main assumption underlying these techniques is that a Group's past claims development experience can be used to project future claims development and hence ultimate claims costs.

Recoverable & Recourse Claims: The provision which is formed on the valuation date of the Financial Statements for recoverable claims; it is actuarially calculated based on historical information.

Payable benefits: Insurance benefits due that have not been paid to policyholders up to the date of the Financial Statements.

Unit-Linked reserves: The provisions intended to meet liabilities of contracts whose benefits are linked to the value of units of a fund that includes financial instruments.

Liability Adequacy Test (LAT): The Group assesses whether its recognised insurance liabilities are adequate by applying a liability adequacy test ("LAT"), by using current estimations of future cash flows. Any additional liability resulting from the LAT increases the carrying amount of insurance liabilities as determined in accordance with the above mentioned contracts and is charged to profit or loss.

2.11.4 Reinsurance Treaties

The Group's receivables from reinsurers, including their share in insurance reserves are recognised as assets under «Reinsurance receivables". The liabilities to reinsurers mainly concern premiums ceded to reinsurers.

The Group assesses whether the claims from reinsurers are impaired on the reporting date, and reduces accordingly their accounting value, recognizing the impairment loss in profit or loss. Reinsurance receivables are impaired only when:

(i) There is objective evidence, as a result of the event that took place following the initial recognition of the receivable, that the current estimates of future cash flows attributed to those receivables differ from the original estimate of such cash flows

(ii) This event has a reliably measurable impact on the amounts that the Group will receive from the reinsurer.

Amounts paid for retrospective reinsurance are recognized in reinsurance receivables, increased by the amount of the reserves relating to the reinsured insurance contracts. Any resulting gain is deferred and amortized until the settlement of the outstanding claims. If the total amount paid exceeds the reserves recognized, the excess is immediately charged to profit or loss.

2.12 Insurance receivables

Insurance receivables include premiums receivable from policyholders, brokers, tied agents as well as legal claims. The Group has signed contracts with its associates which provide time credit to associates for the collection of premiums. Premiums are generally collected in accordance with the provisions of the Policy for the Management and Collection of Premiums ("PODIPEA"). Insurance receivables are recognised on the Financial Statements on the issue date of insurance contracts.

2.12.1 Provision for impairment of insurance receivables

A provision for the impairment of insurance receivables is recognised if there is objective evidence that the Group will be unable to collect all amounts due on a contract according to the original contractual terms.

The Group assesses whether objective evidence of impairment exists for the portfolio of receivables that are considered individually significant. A receivable is subject to an impairment test when the outstanding balance is overdue for a period over ninety days and/or such qualitative indications exist, at the assessment date, which indicate that the policyholder will not be able to meet their insurance obligations.

At each balance sheet date, all past due or doubtful receivables are assessed to determine whether or not a provision for non-performing receivables is required. The balance of such provision is appropriately adjusted at each balance sheet date in order to reflect all possible risks. Any amount written off is debited to the existing provision. It is the Group's policy not to write off an account until all possible legal action has been exhausted.

2.13 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.

2.14 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 Group 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 Group 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 derecognised. 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 Group 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 Group 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.

2.15 Investment property

Investment property includes land and buildings owned by the Group (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.

2.16 Goodwill, software, and other intangible assets

2.16.1 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 Group 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 Group 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 evaluator or pricing model. If the recoverable amount is less than the carrying amount, an irreversible impairment loss is recognised, and the goodwill is written down by the excess of the carrying amount of the unit over its recoverable amount.

2.16.2 Software

Software includes costs that are directly associated with identifiable and unique software products controlled by the Group 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 recognised 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 recognised 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 recognised, 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 Group 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 Group is recognised as an expense when it is incurred.

2.16.3 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.

2.17 Leases

The Group, at the inception of a contract, assesses whether the contract is or contains a lease by examining whether the Group 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.

2.17.1 A Group company is the lessee

The Group 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 recognised as operating expenses on a straight-line basis over the lease term.

At the commencement date of the lease the Group:

1. Recognises a right of use (“RoU”) asset representing the Group’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 Group’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.

2.17.2 Right of Use assets (RoU)

As stated above, the Group 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".

2.17.3 Lease liabilities

At the commencement date of the lease, the Group 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 Group 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 rate of interest that a lessee 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 right-of-use 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 Group 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 recognised 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 Group's estimate of the amounts expected to be payable under a residual value guarantee, or if the Group 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.

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

The Group 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 Group recognizes the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

2.17.5 A Group 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 recognised on a straight-line basis over the lease term.

2.18 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, investment and trading securities which are subject to insignificant risk of changes to fair value and are used by the Group in the management of its short-term commitments.

2.19 Provisions

Provisions are recognised when the Group 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 recognised as a provision shalll 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.

2.20 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 recognised 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.

2.21 Employee benefits

Group companies operate various post-employment benefit plans in accordance with local conditions and practices in their respective countries. Such plans are classified as defined benefit and defined contribution plans.

2.21.1 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. An expense is recognised each year only for the employee's final 16 years of service. Likewise, the corresponding provision 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.

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 excluding interest) 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.

2.21.2 Defined contribution plans

A defined contribution plan is a post-employment benefit plan under which the Group pays fixed contributions into a separate entity and has no legal or constructive obligations to pay further contributions, if the entity does not hold sufficient assets to pay all employees' benefits relating to employee service in the current and prior periods. Group contributions to defined contribution plans are charged to profit or loss in the year to which they relate and are included within staff costs.

2.21.3 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 Group to its personnel).

As far as the recognition of the termination benefits is concerned, the Group 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 due more than 12 months after the end of the reporting period are discounted to their present value.

2.22 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 recognised 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 Group and the Parent Company consider 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 Group and the Parent Company were to determine that it would be able to realize their deferred income 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 recognised 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 Group and it is probable that the difference will not reverse in the foreseeable future.

Deferred income tax relating to fair value changes of available-for-sale investment securities and cash flow hedges, which are charged or credited to other comprehensive income, is also credited or charged to other comprehensive income where applicable and is subsequently recognised in the profit or loss together with the deferred gain or loss.

2.23 Debt securities in issue and other borrowed funds

Debt securities issued and other borrowed funds are initially recognised at fair value net of transaction costs incurred. Subsequent measurement is at amortised cost (unless they are designated as at fair value through profit or loss) and any difference between net proceeds and the redemption value is recognised in the income statement over the period of the borrowings using the effective interest rate method.

2.24 Share capital

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 recognised as a liability in the period in which they are approved by the Parent Company's Shareholders at the Annual General Meeting.

2.25 Business segments

The Group presents information per business segment on the basis of the most significant insurance activities.

Business segments presented in the Financial Statements are reported in a manner consistent with the internal reporting provided to the Management of the Parent company and the Group used for the decision making process regarding the development of the business strategy, the allocation of resources by business segment and the assessment of its performance.

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

The Group 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 amortisation that would have been recognised 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.

2.27 Related party transactions

Related parties include entities, over which the Group has control, joint control or the ability to exercise significant influence in making financial and operating decisions. Related parties include directors of the Parent Company and the members of the Board of Directors, their close relatives, companies owned or controlled by them and companies over which they can influence the financial and operating policies. Related parties also include the transactions of the Parent Company with its senior parent(s) as well as with the subsidiaries of its senior parent(s).

2.28 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 Group, and based on their nature are recognised as follows:.

Insurance contracts - Revenue from insurance contracts is recognised as described in note 2.11.

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 General Meeting.

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

2.29 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 recognised amounts and there is an intention to realize the asset and settle the liability simultaneously or on a net basis.

2.30 Derecognition

A financial asset (or, where applicable, a part of a financial asset or part of a group of similar financial assets) is derecognised when the rights to receive cash flows from the asset have expired.

A financial liability is derecognised when it matures, expires or when it is cancelled. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference between the carrying amount of the financial liability extinguished or transferred to another party and the consideration paid, including any non-cash assets transferred or liabilities assumed, is immediately recognised in profit or loss.

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 Consolidated and Parent company 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 reserves, 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 Group is certain that the estimates and the assumptions that have been carried out for the preparation of the Consolidated and Parent company Financial Statements reflect fully the events and the conditions as of 31 December 2022.

Significant accounting estimates and related uncertainty: The Group performs the key estimates and assumptions related to implementation of the IFRS on the below important cases:

3.1 Valuation of insurance provisions

Life insurance

Insurance reserves 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 Parent Company observes on a continuing basis the estimates of the outstanding claims in order to reflect the current economic conditions.

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 Group companies until the estimation date.

3.2 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.

3.3 Deferred tax

Deferred tax assets relating to unrealized losses on bonds, shares and mutual funds, deductible temporary differences and carried forward tax losses, are recognised 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 recognised, based upon the likely timing and level of future taxable profits, together with future tax-planning strategies.

The management of the Parent Company considers that the recovery of the recognized deferred tax assets on December 31, 2022 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.

3.4 Impairment of investment securities

The Group follows the guidance of IAS 39 to determine when investment securities are impaired. This determination requires significant judgment. In particular, for investments in equity instruments, the Group evaluates whether there has been a significant or prolonged decline in the fair value below its cost. In making this judgment, the Group considers among other factors, the normal volatility in the security price and the financial health of and near-term business outlook for the investee, including factors such as industry and sector performance, changes in technology and operational and financing cash flow.

3.5 Impairment of premium receivables

Provisions for non-performing insurance receivables are calculated as the difference between the receivables' carrying amount and the value of expected cash inflows resulting from assessing uncollected premiums and potential loss that may occur. Assessments are performed based on a documented methodology.

This methodology comprises two key components: individual and collective assessment.

Individually, recoverable assets are assessed by taking into consideration the financial status of the debtor, any securities or guarantees, the possibility of offsetting such receivables against current or future obligations of the Company, the breadth of the debtor's relationship and his past behavior regarding his transactions with the Company and the Group.

The assets to be recovered collectively are assessed on the basis of past trends projected into the future, taking into consideration the change of portfolio quality and size.

3.6 Impairment of property, plant and equipment and investment property

At the end of each period, the Group and the Parent Company assess evidence of impairment for their property, comparing the carrying value of their assets with their fair value, as determined by certified independent evaluators. The fair value is calculated on the basis of the value of similar property in the same area and of future income from lease contracts in force 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. As regards property used by the Group 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.

3.7 Fair value of financial instruments

The fair values of financial instruments that are not quoted in active markets are determined by using valuation methods. These include discounted cash flow and other models based mainly on observable input parameters and to a small extent to non-observable input parameters.

Valuation models are used primarily to value derivatives transacted in the over-the-counter market.

All valuation models are validated before they are used as a basis for financial reporting, and periodically reviewed thereafter, by qualified personnel independent of the area that created the model. Wherever possible, the Group compares valuations derived from models with quoted prices of similar financial instruments and with actual values when realised, in order to further validate and calibrate its models. A variety of factors are incorporated into the Group's models, including actual or estimated market prices and rates, such as time value and volatility, market depth and liquidity and credit risk.

The Group applies its models consistently from one period to the next, ensuring comparability and continuity of valuations over time, but estimating fair value inherently involves a significant degree of judgment. The management of the Group therefore establishes valuation adjustments to cover the risks associated with the estimation of unobservable input parameters and the assumptions within the models themselves.

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.

3.8 Cost of defined benefit plans

The net cost of defined benefit plans is actuarially determined using assumed discount rates, rates of compensation increase, staff turnover and the expected long-term return on plan assets. The compensation increase is determined by reviewing the Group's salary increases each year. The expected long-term return on plan assets represents management's expectation of the average rate of earnings on the funds invested to provide for the benefits included in the projected benefit obligation.

NOTE 4: INSURANCE AND FINANCIAL RISK MANAGEMENT

4.1 Risk management framework

The Group 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 Group 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 Group's entities, as well as by its parent company.

In this context, a Risk Management Committee and an Asset Liability Committee (ALCO), as well as a Risk Management Division have been established.

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

- Risk of asset-liability mismatch
- Insurance risk
- Credit risk
- Liquidity risk
- Market risk
- Concentration risk
- Operational risk
- Country risk
- Reputational risk
- Sustainability (ESG) risk

Risk management procedures include risk identification, measurement, monitoring, control and reporting.

With the transition to the Solvency II regulatory framework the Group measures risks, taking also into account the provisions of the aforementioned framework.

The risk management framework is complemented by the Group Regulatory Compliance Division, which is in charge of compliance with legal and regulatory requirements applicable, and the Group Internal Audit Division, which reports directly to the Board through the Audit Committee and controls the effectiveness of the risk management framework and control environment.

4.1.1 Risk Management Committee

The Risk Management Committee develops and proposes to the Board of Directors the risk management strategy, as well as the policies that govern the management of the undertaken risks and monitors their implementation and results.

The Risk Management Committee is comprised of three non-executive members of the Board, of whom two members are independent, non-executive members. The members and the chairman of the Committee are appointed by the Board of Directors following the recommendations of the Remuneration and Nomination Committee.

The Committee is responsible for the effective implementation of the risk management framework and for the assessment of the overall risk exposure of the Company and the Group, taking into account the approved Risk Management Strategy and the approved business plan of the Company and the Group. The Chief Risk Officer (CRO) recommends to the committee.

4.1.2 Risk Management Division

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

- Monitoring, controlling, assessing and reporting all significant risks.
- Supporting risk taking units by providing them with adequate risk management methodology and tools.
- Proposing risk management policies regarding significant risks undertaken by the Company and the Group.
- Submitting, along with other Units, action plans for the adjustment of risks undertaken within acceptable levels.

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 Division.

4.2 Insurance risk

Insurance contracts issued by the Group include either insurance or financial risk. The risk under any insurance policy is the possibility of the insured event resulting in a claim. By the very nature of an insurance policy, risk is based on fortuity and is therefore unpredictable.

The principal risk that the Group may face under its insurance contracts is that the actual claims and benefit payments or the timing thereof, differ from expectations. This could occur because the frequency and/or severity of claims is greater than estimated. Depending on the insurance product, this risk is influenced by macroeconomic changes, changes in customer behaviour, changes in public health, pandemics and catastrophic events such as earthquakes, industrial disasters, fires, riots or terrorism.

The above risk exposure is mitigated by diversification across a large portfolio of insurance contracts. The variability of risks is also improved by the careful selection and implementation of the Group’s underwriting policy, reinsurance strategy and internal guidelines, within an overall risk management framework. Pricing is based on assumptions and statistics and the Group’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 Group include whole life, endowment, term assurance, term assurance with survival benefit, pension, Unit-Linked and rider benefits attached to insurance contracts.

4.2.1.1 Traditional Life insurance contacts

These contracts insure events associated with policyholders’ life (for example, death or survival).

Guaranteed benefits paid on occurrence of the specified insurance event are either fixed or linked to the financial loss suffered by the policyholder.

The main risks that the Group 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 behaviour (lapses and surrenders) being different than expected.

Group has also significant exposure to contracts with guaranteed return.

Key assumptions

Life insurance policy estimates are initially made at inception of the policy, when the Group determines the key assumptions applicable to the type of life insurance policy, such as future deaths, voluntary terminations, investment returns and administration expenses. Subsequently, new estimates are developed at each reporting date to determine whether the liabilities are adequate in light of the current experience.

The key assumptions to which the estimation of liabilities 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 Group and thus reflecting the best estimate for that year. Assumptions are differentiated by sex and type of insurance plan.
- *Expenses*: Operating expenses assumptions reflect the projected costs of maintaining and servicing in-force contracts. The current level of expenses, as at 31 December 2022, 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 Group's experience and vary by product type.
- *Discount rate:* The liability adequacy test 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.
- *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 Company's past experience.

Liability adequacy test

Life business comprises of the following three main categories depending on the nature of the cover:

i. *Individual traditional contracts (whole life, endowment, pure endowment, term, pension plans etc.):*

The test was based on the projection of the future cash flows using current assumptions in terms of mortality, lapses, proportion of policyholders receiving a lump sum benefit on a monthly basis at the beginning of the retirement, interest rate and expenses for the expected remaining term of insurance contracts. The aforementioned test resulted in additional reserves.

ii. *Unit-Linked contracts with guaranteed return at maturity :*

Analysis considered both risks associated to parameters (mortality, lapses, interest rate, expenses) and risks associated to guaranteed return at the end of the policy terms. Despite the increase in the value of the funds during the last year an additional liability was necessary to cover the guaranteed return to policyholders.

iii. *Unit-Linked contracts with guaranteed death penalty :*

Following the termination of sales of contracts with a guaranteed benefit, the company has issued new investment contracts without guaranteed return. For such contracts, apart from the unit-fund reserve, no additional reserve has resulted upon assessment of the underlying risks (mortality risk and level of expenses).

iv. Pension beneficiaries that stem from Deposit Administration Funds ("DAF"):

The process followed was similar to that of individual traditional contracts. The test produced a liability that exceeded reserves to cover longevity risk.

Sensitivity Analysis

The sensitivity analysis set out below is calculated for those factors which are considered significant (discount rate and lapse rates) as regards the effect of their change in the recorded reserves.

The results of the sensitivity analysis refer to the liabilities which relate to the portfolio of individual traditional contracts, to benefits to pensioners who previously held DAF contracts as well as to the portfolio of Unit Linked contracts.

2022	Change in assumptions	Increase/(Decrease) on Insurance Liabilities (€ thousands)
Discount Rate	+0.50%	(9,430)
	-0.50%	10,091
Lapse / Surrender Rates	increase by +10%	(553)
	decrease by -10%	560
Mortality Rates	increase by +10%	(1,521)
	decrease by -10%	1,666
Operating Expenses	increase by +10%	111

2021	Change in assumptions	Increase/(Decrease) on Insurance Liabilities (€ thousands)
Discount Rate	+0.50%	(10,538)
	-0.50%	45,964
Lapse / Surrender Rates	increase by +10%	(888)
	decrease by -10%	1,676
Mortality Rates	increase by +10%	(1,456)
	decrease by -10%	1,585
Operating Expenses	increase by +10%	281

4.2.1.2 Riders on Life insurance products

Life insurance contracts may include personal accident and hospitalization riders, which protect the Group's clients from the consequences of disability or hospital treatment due to an accident or illness of the policyholder or their dependents.

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

- *Morbidity risk:* risk of loss arising due to policyholder health experience being different 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 behaviour (lapses and surrenders) being different than expected.

Key assumptions

The key assumptions (apart from lapse / surrender risk, expense risk and discount rate) to which the estimation of liabilities is particularly sensitive are as follows:

- *Morbidity rates*: Rates of hospitalization, by age and type of coverage, derived from the historical 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.

Liability adequacy test

Life business comprises of the following two main categories depending on the nature of the cover:

i. Hospitalisation riders:

The test was based on current assumptions for discount rate, morbidity ratios, medical claim inflation, lapse rate, expenses and annual premium increase. The aforementioned test did not result in additional reserves.

ii. Other riders:

The test was based on current assumptions for discount rate, disability rates, lapses and expenses. The test resulted in additional reserves.

The liability adequacy test for health insurance contracts (health riders) was based on the estimation of the present value of the portfolio's future cash flows. The test did not result in additional technical reserves as it did not exceed Unearned Premium Reserve (UPR) that was already recorded.

Sensitivity analysis

The sensitivity analysis set out below is calculated for those factors which are considered significant as regards the effect of their change in Company's technical reserves.

2022	Change in assumptions	Increase/(Decrease) on insurance Liabilities *(€ thousands)*
Disability Rates	increase by +10%	1,810
	decrease by -10%	(1,873)
Morbidity Rates	increase by +5%	-
	decrease by -5%	-

2021	Change in assumptions	Increase/(Decrease) on Insurance Liabilities *(€ thousands)*
Disability Rates	increase by +10%	2,245
	decrease by -10%	(2,252)
Morbidity Rates	increase by +5%	42,373
	decrease by -5%	-

4.2.2 Non-life Insurance

The Group provides products that cover a large range of risks such as personal, commercial, industrial risks and other risks related to property damage and third party liability.

The above risk exposure is mitigated by diversification across a large portfolio of insurance contracts. The diversity of risks is also improved by careful selection and implementation of underwriting policy, reinsurance strategy and internal guidelines, within an overall risk management framework. Pricing is based on past experience taking into consideration current trends and market conditions.

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 Group:

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 Group'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 Group's policy for claims handling is focused on the timely settlement of claims and the prevention of fraudulent cases being accepted by the Group. 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 subjectivity, 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 creation of reserves which have not been reported to the Group companies at the reporting date.

Reinsurance Policy: The selection of the optimal reinsurance coverage varies depending on the nature of the risks involved, the Group'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 Group 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.

Liability adequacy test

For all lines of businesses a liability adequacy test is performed for the adequacy of the technical provisions. With regards to the motor line of business (the largest line of business), historical data was examined on a per nature of claim basis, for each accident year after 2000 and the following methods were applied in order to estimate the ultimate cost for each accident year: cumulative payments, incurred claims, average claim cost projections and the Bornhuetter-Ferguson, Cape Cod και Benktander methods of which the results were selected for the estimation of the total cost for each accident year.

Claims development tables

The tables below present the development of the incurred claims cost for each accident year from 2016 to 2022. In addition, the corresponding amounts of the cumulative actual claims payments are included, in order for there to be a distinction between actual payments and reserves. Outstanding claims estimates for years prior to 2016 are presented for reconciliation reasons. Note that for Motor TPL, where additional reserves, resulted from the LAT performed (for both IBNR claims and adverse future deviation of the case estimates for reported claims) are included in the estimates presented.

For the Fire business (the second largest property and casualty line of business after Motor), the total cost per year is the sum of the cumulative payments and the reserves per case (no additional reserves resulted from the LAT performed).

The Motor and Fire lines of business account for over 80% of the outstanding claim reserves balances.

Motor TPL claims development	*(€ thousands)*								
Accident year	**Reserves prior to 2016**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**Total**
Accident year	-	47,832	40,213	45,080	43,006	34,886	39,351	42,956	
One year later	-	45,799	50,398	52,258	46,747	37,951	41,389		
Two years later	-	47,687	50,701	53,165	49,598	36,863			
Three years later	-	48,298	50,860	52,336	49,414				
Four years later	-	47,011	50,888	50,455					
Five years later	-	46,119	47,422						
Six years later	-	35,118							
Current estimate of cumulative claims		**35,118**	**47,422**	**50,455**	**49,414**	**36,863**	**41,389**	**42,956**	
Accident year	-	(10,832)	(10,198)	(9,994)	(9,353)	(8,318)	(8,482)	(10,378)	
One year later	-	(19,605)	(17,048)	(17,093)	(14,975)	(12,954)	(15,127)		
Two years later	-	(21,950)	(19,772)	(19,795)	(16,500)	(14,641)			
Three years later	-	(23,585)	(20,944)	(22,354)	(18,011)				
Four years later	-	(25,550)	(23,586)	(23,931)					
Five years later	-	(26,838)	(25,971)						
Six years later	-	(27,676)							
Cumulative payments		**(27,676)**	**(25,971)**	**(23,931)**	**(18,011)**	**(14,641)**	**(15,127)**	**(10,378)**	
Total outstanding claims reserve	**43,737**	**7,442**	**21,451**	**26,524**	**31,403**	**22,222**	**26,262**	**32,579**	**211,620**

Fire claims development		(€ thousands)							
Accident year	Reserves prior to 2016	2016	2017	2018	2019	2020	2021	2022	Total
Accident year	-	17,467	14,246	14,086	9,852	7,669	11,783	5,365	
One year later	-	21,241	22,263	18,618	8,786	7,992	10,662		
Two years later	-	21,629	22,112	18,511	8,441	7,806			
Three years later	-	22,230	20,821	18,379	8,223				
Four years later	-	21,098	19,718	17,641					
Five years later	-	21,026	16,568						
Six years later	-	21,360							
Current estimate of cumulative claims		**21,360**	**16,568**	**17,641**	**8,223**	**7,806**	**10,662**	**5,365**	
Accident year	-	(12,306)	(2,759)	(8,651)	(3,259)	(1,805)	(2,921)	(1,365)	
One year later	-	(15,386)	(7,231)	(11,773)	(5,949)	(5,856)	(8,248)		
Two years later	-	(17,786)	(8,152)	(12,049)	(6,385)	(6,295)			
Three years later	-	(19,308)	(10,429)	(12,229)	(6,771)				
Four years later	-	(20,784)	(10,557)	(12,300)					
Five years later	-	(20,796)	(10,559)						
Six years later	-	(20,802)							
Cumulative payments		**(20,802)**	**(10,559)**	**(12,300)**	**(6,771)**	**(6,295)**	**(8,248)**	**(1,365)**	
Total outstanding claims reserve	**4,454**	**558**	**6,009**	**5,340**	**1,452**	**1,511**	**2,414**	**4,000**	**25,739**

4.3 Credit Risk

Credit Risk Concentration

The Group doesn't have significant credit risk concentration from its counterparties. Maximum exposure to credit risk is reflected by the amount of each asset. The main counterparties by whom the Group is exposed to credit risk are reinsurers who may be unable to cover their share of insurance claims already paid to beneficiaries, policyholders and other partners of the Group (agents and others) who may be unable to pay insurance premiums due, the issuers of bonds on which the Group has invested as well as the banks in which it holds deposits. With the transition to the new Solvency II supervisory framework, the Group measures the counterparty default risk according to the provisions of SII framework, which also take into account the concentration of this risk per counterparty.

The solvency capital requirements for the counterparty default risk as at 31.12.2022 amounted to a lower amount by 5.2% of the total Solvency capital requirement after the sharing of the benefit of risk differentiation (2021: 3.6%).

The Group's policy is to enter into transactions with reinsurers and third-parties which fulfil high standards and are based on a high level of creditworthiness.

Exposure to credit risk

The following table sets out the maximum exposure of the Group and the Parent 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). Among domestic government bonds, the parent company possesses Greek Government Bonds (GGBs) amounting to €78,745 thousands and €604,119 thousands for 2022 and 2021 respectively and has short term placements in Greek Treasury Bills (T-bills) amounting to €122,522 thousands and €433,263 thousands for 2022 and 2021 respectively.

	Note	GROUP 31/12/2022	GROUP 31/12/2021	PARENT COMPANY 31/12/2022	PARENT COMPANY 31/12/2021
		(€ thousands)		(€ thousands)	
Available-for-sale securities					
- Debt securities (Bonds)					
- Greek Government	26	201,267	1,037,382	201,267	1,037,382
- Foreign Government	26	1,390,619	1,201,663	1,390,619	1,191,839
- Greek Corporate-listed	26	206,568	214,531	206,568	214,531
- Foreign Corporate-listed	26	232,528	287,535	232,528	287,535
- Mutual funds					
- Greek	26	195,761	219,131	195,761	219,131
- EU	26	239,607	203,048	239,607	203,048
FVTPL securities					
- Trading Securities					
Debt securities (Bonds)					
-Foreign Government	27	16,506	19,111	-	-
- Greek Corporate-listed	27	546	637	-	-
- Total FVTPL securities excl. Trading securities and Unit - Linked					
Mutual funds					
- Foreign	27	6,411	7,367	-	-
- Derivative financial instruments	27	239	119	239	119
Securities classified as loans and receivables					
- Greek Corporate – Listed	28	-	-	-	-
- Foreign Government	28	40,876	41,018	40,876	41,018
Insurance premium receivables and other receivables	30	102,930	111,079	96,091	99,848
Reinsurance receivables	31	75,024	91,978	68,114	73,839
Cash and cash equivalents					
-Greek banks	32	64,709	79,723	62,727	75,390
- Non Greek banks	32	10,513	8,793	-	-
Total credit risk		**2,784,104**	**3,523,115**	**2,734,397**	**3,443,680**

The table below presents an analysis of debt securities as at 31 December 2022 and 31 December 2021 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 by the (S & P). Category AAA is the highest rating. The “Not Rated” category includes mainly Greek Treasury Bills and the mutual funds.

31 December 2022	GROUP										
Credit rating	AAA	AA	A	BBB	BB	B	CCC	CC	C	Not Rated	Total
	(€ thousands)										
Available-for-sale securities											
- Debt securities (Bonds)	320,774	441,663	76,229	482,436	132,188	28,354	22,141	-	-	527,197	**2,030,982**
- Equities	-	-	-	-	-	-	-	-	-	41,908	**41,908**
- Mutual funds	-	-	-	-	-	-	-	-	-	435,368	**435,368**
Securities at fair value through profit or loss											
- Trading securities											
Debt securities (Bonds)	466	2,633	-	13,244	-	709	-	-	-	-	**17,052**
Equities	-	-	-	-	-	7	-	-	-	-	**7**
- Non trading securities											
Mutual funds	-	5,273	-	583	-	555	-	-	-	-	**6,411**
- Unit Linked (Contracts that the policyholder bears the risk)	420	4,948	5,481	12,749	66,807	333,033	-	-	-	192,179	**615,617**
- Derivative financial instruments	-	-	-	-	239	-	-	-	-	-	**239**
receivables	-	-	-	-	40,876	-	-	-	-	-	**40,876**
Insurance premium and other receivables	-	-	-	-	-	-	-	-	-	53,851	**53,851**
Loans receivables	-	-	-	-	-	-	-	-	-	13,237	**13,237**
Reinsurance receivables	-	36,649	34,358	578	-	-	-	-	-	3,439	**75,024**
Cash and Cash Equivalent	-	-	2,341	-	2,761	64,735	2,721	-	-	2,664	**75,222**
Total credit risk	**321,660**	**491,165**	**118,409**	**509,590**	**242,871**	**427,393**	**24,862**	**-**	**-**	**1,269,843**	**3,405,793**

31 December 2021											
Credit rating	AAA	AA	A	BBB	BB	B	CCC	CC	C	Not Rated	Total
	(€ thousands)										
Available-for-sale securities											
- Debt securities (Bonds)	74,783	312,581	150,469	701,810	659,450	42,541	21,779	-	-	777,698	**2,741,111**
- Equities	-	-	-	-	-	-	-	-	-	41,177	**41,177**
- Mutual funds	-	-	-	-	-	-	-	-	-	422,179	**422,179**
Securities at fair value through profit or loss											
- Trading securities											
Debt securities (Bonds)	-	-	-	18,899	-	849	-	-	-	-	**19,748**
Equities	-	-	-	-	-	4	-	-	-	6	**10**
- Non trading securities											
Mutual funds	-	5,162	-	1,579	-	626	-	-	-	-	**7,367**
- Unit Linked (Contracts that the policyholder bears the risk)	-	-	3,124	24,492	80,252	337,970	-	-	-	166,961	**612,799**
- Derivative financial instruments	-	-	-	-	119	-	-	-	-	-	**119**
receivables	-	-	-	-	41,018	-	-	-	-	-	**41,018**
Insurance premium and other receivables	-	-	-	-	-	-	-	-	-	45,576	**45,576**
Loans receivables	-	-	-	-	-	-	-	-	-	14,854	**14,854**
Reinsurance receivables	-	43,605	36,363	7,964	-	-	614	-	-	3,432	**91,978**
Cash and Cash Equivalent	-	-	2,759	50	-	50,508	31,052	-	-	4,147	**88,516**
Total credit risk	**74,783**	**361,348**	**192,715**	**754,794**	**780,839**	**432,497**	**53,445**	**-**	**-**	**1,476,030**	**4,126,451**

31 December 2022	AAA	AA	A	BBB	BB	B	CCC	CC	C	Not Rated	Total
Credit rating	PARENT COMPANY (*€ thousands*)										
Available-for-sale securities											
- Debt securities (Bonds)	320,774	441,663	76,229	482,436	132,188	28,354	22,141	-	-	527,197	**2,030,982**
- Equities	-	-	-	-	-	-	-	-	-	41,908	**41,908**
- Mutual funds	-	-	-	-	-	-	-	-	-	435,368	**435,368**
Securities at fair value through profit or loss											
- Trading securities											
Debt securities (Bonds)	-	-	-	-	-	-	-	-	-	-	**-**
Equities	-	-	-	-	-	-	-	-	-	-	**-**
- Non trading securities											
Mutual funds	-	-	-	-	-	-	-	-	-	-	**-**
- Unit Linked (Contracts that the policyholder bears the risk)	-	-	3,416	-	64,628	326,897	-	-	-	188,184	**583,125**
- Derivative financial instruments	-	-	-	-	239	-	-	-	-	-	**239**
Securities classified as loans and receivables	-	-	-	-	40,876	-	-	-	-	-	**40,876**
Insurance premium and other receivables	-	-	-	-	-	-	-	-	-	47,440	**47,440**
Loans receivables	-	-	-	-	-	-	-	-	-	13,237	**13,237**
Reinsurance receivables	-	31,011	33,415	578	-	-	-	-	-	3,110	**68,114**
Cash and Cash Equivalent	-	-	-	-	-	58,960	2,721	-	-	1,046	**62,727**
Total credit risk	**320,774**	**472,674**	**113,060**	**483,014**	**237,931**	**414,211**	**24,862**	**-**	**-**	**1,257,490**	**3,324,016**

31 December 2021	AAA	AA	A	BBB	BB	B	CCC	CC	C	Not Rated	Total
Credit rating	(*€ thousands*)										
Available-for-sale securities											
- Debt securities (Bonds)	74,783	312,581	150,469	691,986	659,450	42,541	21,779	-	-	777,698	**2,731,287**
- Equities	-	-	-	-	-	-	-	-	-	41,177	**41,177**
- Mutual funds	-	-	-	-	-	-	-	-	-	422,179	**422,179**
Securities at fair value through profit or loss											
- Trading securities											
Debt securities (Bonds)	-	-	-	-	-	-	-	-	-	-	**-**
Equities	-	-	-	-	-	-	-	-	-	-	**-**
- Non trading securities											
Mutual funds	-	-	-	-	-	-	-	-	-	-	**-**
- Unit Linked (Contracts that the policyholder bears the risk)	-	-	-	5,458	79,702	333,478	-	-	-	158,400	**577,038**
- Derivative financial instruments	-	-	-	-	119	-	-	-	-	-	**119**
Securities classified as loans and receivables	-	-	-	-	41,018	-	-	-	-	-	**41,018**
Insurance premium and other receivables	-	-	-	-	-	-	-	-	-	35,581	**35,581**
Loans receivables	-	-	-	-	-	-	-	-	-	14,854	**14,854**
Reinsurance receivables	-	33,636	28,763	7,964	-	-	614	-	-	2,862	**73,839**
Cash and Cash Equivalent	-	-	737	-	-	42,557	31,052	-	-	1,044	**75,390**
Total credit risk	**74,783**	**346,217**	**179,969**	**705,408**	**780,289**	**418,576**	**53,445**	**-**	**-**	**1,453,795**	**4,012,482**

The following table provides information on the exposure of the Group and the Parent Company to credit risk and based on the maturity analysis of receivables net of any provision for impairment.

GROUP	31/12/2022 <180 days	181 - 360 days	>360 days	Total past due, non impaired receivables	31/12/2021 <180 days	181 - 360 days	>360 days	Total past due, non impaired receivables
	(*€ thousands*)				(*€ thousands*)			
Insurance premium and other receivables	45,665	5,776	2,410	**53,851**	43,512	737	1,327	**45,576**
Loans receivables	150	104	12,983	**13,237**	508	117	14,229	**14,854**
Reinsurance receivables	5,879	8,690	60,455	**75,024**	20,103	1,208	70,667	**91,978**
Total	**51,694**	**14,570**	**75,848**	**142,112**	**64,123**	**2,062**	**86,223**	**152,408**

Past due balances under "Insurance premium receivables", “Loans” and "Reinsurance receivables" set out above, are presented net of the corresponding provision for impairment (see Notes 30 and 31, accordingly) which has been calculated taking into consideration any property restricted in favour of the Company. Financial and non-financial assets are reviewed for impairment in line with the Group's accounting principles, as detailed under Note 2. Loans are secured by collaterals of real estate and other financial and non-financial assets.

PARENT COMPANY	31/12/2022			Total past due, non impaired receivables	31/12/2021			Total past due, non impaired receivables
	<180 days	181 - 360 days	>360 days		<180 days	181 - 360 days	>360 days	
	(€ thousands)				(€ thousands)			
Insurance premium and other receivables	43,291	5,301	(1,151)	**47,440**	34,992	(297)	886	**35,581**
Loans receivables	150	104	12,983	**13,237**	508	117	14,229	**14,854**
Reinsurance receivables	3,320	8,178	56,616	**68,114**	9,923	(1,623)	65,539	**73,839**
Total	**46,761**	**13,583**	**68,448**	**128,791**	**45,423**	**(1,803)**	**80,654**	**124,274**

4.4 Liquidity risk

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 Group.

The Group manages liquidity risk by monitoring cash flows on an ongoing basis. It calculates and monitors the expected cash flows, and takes the appropriate measures to maintain cash buffers. The following table presents an analysis of the maturity of financial liabilities of the Group and the Parent Company.

GROUP 31 December 2022	Up to 1 year	1 to 3 yrs	4 to 8 yrs	Over 8 yrs	Total
			(€ thousands)		
Mathematical reserves, technical insurance provisions and investment contracts	594,550	322,233	930,270	1,045,401	**2,892,454**
Financial and other liabilities	85,008	(300)	178,350	-	**263,058**
Reinsurance liabilities	19,462	631	(75)	14	**20,032**
Total	**699,020**	**322,564**	**1,108,545**	**1,045,415**	**3,175,544**

31 December 2021	Up to 1 year	1 to 3 yrs	4 to 8 yrs	Over 8 yrs	Total
			(€ thousands)		
Mathematical reserves, technical insurance provisions and investment contracts	443,111	443,987	783,508	1,187,324	**2,857,930**
Financial and other liabilities	83,064	(371)	170,699	-	**253,392**
Reinsurance liabilities	24,813	9	38	-	**24,860**
Total	**550,988**	**443,625**	**954,245**	**1,187,324**	**3,136,182**

PARENT COMPANY 31 December 2022	Up to 1 year	1 to 3 yrs	4 to 8 yrs	Over 8 yrs	Total
			(€ thousands)		
Mathematical reserves, technical insurance provisions and investment contracts	575,596	317,168	882,995	1,045,401	**2,821,160**
Financial and other liabilities	84,228	(508)	176,405	-	**260,125**
Reinsurance liabilities	20,728	5	12	14	**20,759**
Total	**680,552**	**316,665**	**1,059,412**	**1,045,415**	**3,102,044**

31 December 2021	Up to 1 year	1 to 3 yrs	4 to 8 yrs	Over 8 yrs	Total
			(€ thousands)		
Mathematical reserves, technical insurance provisions and investment contracts	420,071	438,077	771,984	1,142,472	**2,772,604**
Financial and other liabilities	71,676	(389)	174,863	-	**246,150**
Reinsurance liabilities	24,397	6	38	-	**24,441**
Total	**516,144**	**437,694**	**946,885**	**1,142,472**	**3,043,195**

The table below sets out the maturity of the financial assets of the Group and the Parent company. The maturity analysis is based on the remaining contractual term for DAC and on expected contractual collection for receivables. Unit Linked contracts cannot be categorized into short-term and long-term receivables as their liquidation depends on the policyholders who bear the risk.

GROUP 31 December 2022	*Current assets**	*Non-current assets*	*Unit-Linked*	*Total assets*
		(€ thousands)		
Deferred acquisition costs (DAC)	14,576	30,116	-	**44,692**
Available-for-sale securities	186,423	2,321,835	-	**2,508,258**
Securities at fair value through profit or loss	4,792	18,917	615,617	**639,326**
Securities classified as loans and receivables	-	40,876	-	**40,876**
Insurance premium and other receivables	77,503	25,427	-	**102,930**
Reinsurance receivables	16,107	58,917	-	**75,024**
Cash and cash equivalents	75,323	-	-	**75,323**
Total	**374,724**	**2,496,088**	**615,617**	**3,486,429**

31 December 2021	Current assets*	Non-current assets	Unit-Linked	Total assets
		(€ thousands)		
Deferred acquisition costs (DAC)	15,011	29,964	-	**44,975**
Available-for-sale securities	446,386	2,758,081	-	**3,204,467**
Securities at fair value through profit or loss	5,543	21,701	612,799	**640,043**
Securities classified as loans and receivables	-	41,018	-	**41,018**
Insurance premium and other receivables	86,538	24,541	-	**111,079**
Reinsurance receivables	21,312	70,666	-	**91,978**
Cash and cash equivalents	88,717	-	-	**88,717**
Total	**663,507**	**2,945,971**	**612,799**	**4,222,277**

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

Short-term and long-term receivables refer to assets regarding life insurance, non-life insurance and DAF investment contracts.

The Unit Linked contracts are categorized at fair value through P&L as their liquidation depends on the policyholders who bear the investment risk.

PARENT COMPANY

31 December 2022	Current assets*	Non-current assets	Unit-Linked	Total assets
		(€ thousands)		
Deferred acquisition costs (DAC)	12,997	29,328	-	**42,325**
Available-for-sale securities	186,423	2,321,835	-	**2,508,258**
Securities at fair value through profit or loss	-	239	583,125	**583,364**
Securities classified as loans and receivables	-	40,876	-	**40,876**
Insurance premium and other receivables	73,225	22,866	-	**96,091**
Reinsurance receivables	11,299	56,815	-	**68,114**
Cash and cash equivalents	62,731	-	-	**62,731**
Total	**346,675**	**2,471,959**	**583,125**	**3,401,759**

31 December 2021	Current assets*	Non-current assets	Unit-Linked	Total assets
		(€ thousands)		
Deferred acquisition costs (DAC)	11,826	29,964	-	**41,790**
Available-for-sale securities	446,386	2,748,257	-	**3,194,643**
Securities at fair value through profit or loss	-	119	577,038	**577,157**
Securities classified as loans and receivables	-	41,018	-	**41,018**
Insurance premium and other receivables	76,299	23,549	-	**99,848**
Reinsurance receivables	8,300	65,539	-	**73,839**
Cash and cash equivalents	75,394	-	-	**75,394**
Total	**618,205**	**2,908,446**	**577,038**	**4,103,689**

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

Short-term and long-term receivables refer to assets regarding life insurance, non-life insurance and DAF investment contracts.

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 and foreign exchange rates with direct impact on fair value risk. The Group and the Parent Company apply techniques to measure market risk, such as Value-at-Risk measurement, sensitivity analysis, and interest rate risk analysis.

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 may change due to fluctuations on the exchange rate.

The Group'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 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 Parent Company on foreign currency consist of the 0.13% of the total assets (2021:0.3%). The respective percentage for the Group amounts to 0.15% (2021: 0.7%).
In order to mitigate foreign exchange risk on liabilities, the Group matches assets and liabilities from insurance and investment contracts by currency.
In accordance with Group, the Group's exposure to foreign exchange risks regularly monitored by Management.

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 market interest rates.

The Group monitors regularly the effect of interest rate risk. The policy of the Group is to maintain an investment portfolio in which the maturity and the yield of the bonds match with the insurance liabilities they cover.

The Management constantly monitors the trend of the interest rates and the financial needs of the Group in order to succeed the match between the assets and the liabilities.

Sensitivity analysis of bonds and debt securities to a vertical change of the yield curve:

Parent Company 31 December 2022	Up to 1 year	1 to 2 yrs	2 to 5 yrs	Over 5 yrs
		(€ thousands)		
	+ 25 bps. - Impact on valuation: increase / (decrease)			
Bonds - Impact on Equity	(176)	(467)	(3,014)	(34,148)
	- 25 bps. - Impact on valuation: increase / (decrease)			
Bonds - Impact on Equity	183	487	3,153	36,608

31 December 2021	Up to 1 year	1 to 2 yrs	2 to 5 yrs	Over 5 yrs
		(€ thousands)		
	+ 25 bps. - Impact on valuation: increase / (decrease)			
Bonds - Impact on Equity	(530)	(331)	(3,031)	(52,150)
	- 25 bps. - Impact on valuation: increase / (decrease)			
Bonds - Impact on Equity	596	346	3,108	55,239

The reduction in the effect of interest rate changes from bonds is mainly due to the reduction of the company's bond portfolio, due to the fall in bond prices during the year. It mainly concerns bonds with a maturity of more than 5 years, as these are more sensitive to the change in interest rates, compared to the shorter durations mentioned in the table

The above sensitivity analysis refers to bonds and debt securities of the Available-for-Sale portfolio as at 31 December 2022, a change in the value of which would affect shareholders' Equity.

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.

Parent Company	2022	2021
	(€ thousands)	
+25 bps.-Impact on Profit before tax: increase/(decrease)	(125)	(125)
-25 bps.-Impact on Profit before tax: increase/(decrease)	125	125

4.5.3 Equity risk

Equity risk is the risk of reduction in the value of an investment due to the reduction in its share price. The Group eliminates its exposure to equity risk by setting limits through its investment policy.

Sensitivity analysis of holdings of shares in fluctuations of prices:

Index 31.12.2022	Change of variables	Impact on Equity	Index 31.12.2021	Change of variables	Impact on Equity
GI ASE	+5%	1,211	GI ASE	+5%	1,058
GI ASE	-5%	(1,211)	GI ASE	-5%	(1,058)

The method of sensitivity analysis remains the same as the previous financial year.

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 Group 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 Group manages concentration risk by setting limits and guidelines in its Investment policy, by diversification of its insurance contract portfolio. Since the transition to the new Solvency II supervisory framework and onwards, the Group has been measuring concentration risk according to the provisions of that framework. There are no solvency capital requirements for the concentration risk at 31.12.2022 in relation to the total capital requirement (2021: 0.0%).

4.7 Operational risk

Operational risk concerns the possibility of internal processes and systems of the Company not operating properly, which may lead to quantitative and qualitative losses. To reduce operational risk, the Company has developed adequate control and reporting procedures to detect, assess, manage and record operational risk. These procedures include the detailed documentation of internal processes and controls, the division of responsibilities, the continuous training of employees, the reconciliation and approval processes, as well as the supervision by the Internal Audit Division. When the effect of operational risk is significant, the Company has developed a plan to minimise operational risk within the acceptable limits for the Company, in compliance with its risk appetite. It is noted that the control framework applied by the Company, is evolving on a constant and ongoing basis.

4.8 Country risk

Country risk refers to events that occur in a specific country and may impact the profits or capital and in general the smooth operation of the Group. These events are under the complete or partial control of the central government, but in no case under the control of individuals or of private entities. Such events can be the worsening of economic conditions, political and social unrest, nationalizations and expropriations, currency depreciations or devaluations, etc. The Group monitors the risks arising from its activities in Greece and in other countries. It has a positive but moderate attitude towards country risk and is willing to operate or invest in countries other than Greece, to the extent that such a choice is consistent with its strategic direction.

4.9 Reputation risk

Reputation risk refers to the formation of a negative perception regarding the Group's image, on the part of customers, counterparties, shareholders, investors, supervisory authorities and others who have a reasonable interest in its operation. In order to manage reputation risk effectively and also to maintain and strengthen its reputation as a reliable and socially responsible provider of insurance services, the Group has a number of internal processes which are summarized in the following:

- Examines individually reputation risk as part of the applied operational and compliance risk management framework.
- Develops insurance products that are characterized by clarity and transparency and ensures their promotion with precision and professionalism by adopting appropriate business practices.
- Implements a wide and up to date system for managing claims, complaints and requests made from customers and partners.
- Maintains a set of ethics and conduct regulations that ensure communication/acceptance by all stakeholders of both the required standards and the consequences of any deviations.

4.10 Capital management

The minimum limit of share capital and total equity of the Group's companies is determined by the regulatory authorities and the company law of each country in which the Group is active. Total equity is monitored by the Group regularly, at least on a quarterly basis, and compared to the required minimum limits, taking into consideration the developments within each Group company or in the external environment, both of which may affect available funds to a great extent.

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 boundaries that are set internally by the company and externally by the European and national regulatory frameworks.

Additionally, 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.

4.11 Sustainability risks – ESG

The Company recognizes that it is subject to sustainability risks and at the same time is committed to operate in a socially responsible manner. The sustainability risks for the Company mainly concern environmental and social issues or events, which may significantly affect its operation. Consequently, the sustainability risks are linked to environmental factors, social issues as well as corporate governance practices (Environmental, Social & Governance – ESG).

In recent years the effects of climate change have become more and more noticeable on people and the economy. This change is mainly the result of human activities, due to the combustion of fossil fuels.

The Company recognizes and assesses sustainability risks in its insurance and investment activities and in its operation. It monitors the relevant developments at a regulatory level, develops an integrated ESG (Environmental, Social, Governance) risk management framework and undertakes actions such as, reducing its energy footprint, supporting vulnerable social groups, providing cultural and sports sponsorships and demonstrating zero tolerance against acts of corruption.

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NOTE 5: BUSINESS SEGMENTS

The Group presents information for the following business segments (primary information). The following business segments reflect Management's understanding and assessment of business operations.

Life insurance: This segment relates mainly to life insurance contracts issued by the Group which includes whole life, endowment, term assurance, term assurance with survival benefit, pension, Unit-Linked, rider benefits attached to life insurance contracts and investment contracts.

Non-life insurance – Motor insurance: This segment includes insurance contracts covering Third Party Liability (TPL), own vehicle damage, legal expenses and roadside assistance.

Non-life insurance – Fire insurance: This segment includes contracts covering fire, earthquake, theft risk and loss of profit.

Non-life insurance – Other Sectors: This segment includes contracts covering risks for cargo, general third party liability, marine hull, marine crew and other.

The Group operates in Greece, Romania and Cyprus.

None of the policyholders, whether individuals or legal entities (neither on a separate nor on a consolidated basis) contributes more than 10% of total premiums to the Parent Company and the Group.

GROUP				31/12/2022		
	Note	LIFE	MOTOR	FIRE	OTHER	TOTAL
				(€ thousands)		
Gross earned premiums and related income	6	409,307	79,855	74,457	47,340	610,959
Less: Ceded premiums to reinsurers	7	(8,462)	(5,358)	(41,129)	(21,670)	(76,619)
Net earned premiums and related income		**400,845**	**74,497**	**33,328**	**25,670**	**534,340**
Investment income	8,9,10	53,647	4,405	1,903	308	60,263
Impairment of financial assets	11	(2,839)	(476)	(98)	(60)	(3,473)
Total investment income		**50,808**	**3,929**	**1,805**	**248**	**56,790**
Other income	12	4,026	844	306	204	5,380
		455,679	**79,270**	**35,439**	**26,122**	**596,510**
Policyholder benefits and claims incurred	13	(292,580)	(35,821)	(2,745)	(8,509)	(339,655)
Commission expenses	14	(62,331)	(12,455)	(5,312)	(5,093)	(85,191)
Movement in mathematical insurance reserves	15	(13,257)	-	-	-	(13,257)
General and administrative expenses	16,17	(64,378)	(30,807)	(17,957)	(12,789)	(125,931)
Profit/ (Loss) before tax and impairment loss on investment in subsidiaries		**23,133**	**187**	**9,425**	**(269)**	**32,476**
Impairment loss on investment in subsidiaries	11					(11,367)
Profit before tax						**21,109**
Liabilities from insurance and investment contracts						
Mathematical reserves and technical insurance provisions	36	1,154,236	266,097	51,572	78,160	1,550,064
Investment contracts liabilities	37	1,342,390	-	-	-	1,342,390
Total		**2,496,626**	**266,097**	**51,572**	**78,160**	**2,892,454**

GROUP

	Note	31/12/2021 LIFE	MOTOR	FIRE	OTHER	TOTAL
		(€ thousands)				
Gross earned premiums and related income	6	390,628	82,405	72,310	41,684	587,027
Less: Ceded premiums to reinsurers	7	(8,000)	(7,489)	(39,572)	(16,304)	(71,365)
Net earned premiums and related income		**382,628**	**74,916**	**32,738**	**25,380**	**515,662**
Investment income	8,9,10	66,355	9,087	2,907	1,526	79,875
Impairment of financial assets	11	(1,283)	(87)	(45)	(22)	(1,437)
Total investment income		**65,072**	**9,000**	**2,862**	**1,504**	**78,438**
Other income	12	3,956	747	298	184	5,185
		451,656	**84,663**	**35,898**	**27,068**	**599,285**
Policyholder benefits and claims incurred	13	(269,627)	(33,445)	(6,429)	(7,562)	(317,063)
Commission expenses	14	(58,972)	(12,365)	(3,004)	(5,347)	(79,688)
Movement in mathematical insurance reserves	15	(11,588)	-	-	-	(11,588)
General and administrative expenses	16,17	(54,159)	(26,199)	(10,163)	(10,072)	(100,593)
Profit before tax and voluntary retirement scheme		**57,310**	**12,654**	**16,302**	**4,087**	**90,353**
Voluntary retirement scheme						(21,236)
Profit before tax						**69,117**
Liabilities from insurance and investment contracts						
Mathematical reserves and technical insurance provisions	36	1,084,350	281,902	58,709	77,307	1,502,268
Investment contracts liabilities	37	1,355,662	-	-	-	1,355,662
Total		**2,440,012**	**281,902**	**58,709**	**77,307**	**2,857,930**

PARENT COMPANY

	Note	31/12/2022 LIFE	MOTOR	FIRE	OTHER	TOTAL
		(€ thousands)				
Gross earned premiums and related income	6	392,645	68,409	68,221	35,684	564,959
Less: Ceded premiums to reinsurers	7	(6,419)	(2,855)	(37,113)	(20,356)	(66,743)
Net earned premiums and related income		**386,226**	**65,554**	**31,108**	**15,328**	**498,216**
Investment income	8,9,10	65,468	5,149	2,316	1,205	74,138
Impairment of financial assets	11	(2,839)	(476)	(98)	(60)	(3,473)
Total investment income		**62,629**	**4,673**	**2,218**	**1,145**	**70,665**
Other income	12	4,184	594	92	128	4,998
		453,039	**70,821**	**33,418**	**16,601**	**573,879**
Policyholder benefits and claims incurred	13	(288,321)	(29,216)	(1,779)	(4,769)	(324,085)
Commission expenses	14	(60,469)	(10,676)	(5,268)	(3,029)	(79,442)
Movement in mathematical insurance reserves	15	(13,674)	-	-	-	(13,674)
General and administrative expenses	16,17	(61,400)	(26,978)	(15,781)	(10,576)	(114,735)
Profit/ (Loss) before tax and impairment loss on investment in subsidiaries		**29,175**	**3,951**	**10,590**	**(1,773)**	**41,943**
Impairment loss on investment in subsidiaries	11					(9,663)
Profit before tax						**32,280**
Liabilities from insurance and investment contracts						
Mathematical reserves and technical insurance provisions	36	1,101,574	256,019	49,938	71,239	1,478,770
Investment contracts liabilities	37	1,342,390	-	-	-	1,342,390
Total		**2,443,964**	**256,019**	**49,938**	**71,239**	**2,821,160**

PARENT COMPANY						
		31/12/2021				
	Note	LIFE	MOTOR	FIRE	OTHER	TOTAL
		(€ thousands)				
Gross earned premiums and related income	6	374,844	71,338	66,612	30,988	543,782
Less: Ceded premiums to reinsurers	7	(6,108)	(4,808)	(35,938)	(15,351)	(62,205)
Net earned premiums and related income		**368,736**	**66,530**	**30,674**	**15,637**	**481,577**
Investment income	8,9,10	68,941	8,979	2,833	1,541	82,294
Impairment of financial assets	11	(1,283)	(87)	(45)	(22)	(1,437)
Total investment income		**67,658**	**8,892**	**2,788**	**1,519**	**80,857**
Other income	12	3,901	391	69	90	4,451
		440,295	**75,813**	**33,531**	**17,246**	**566,885**
Policyholder benefits and claims incurred	13	(264,999)	(26,862)	(5,998)	(4,302)	(302,161)
Commission expenses	14	(57,227)	(10,749)	(3,232)	(3,420)	(74,628)
Movement in mathematical insurance reserves	15	(9,121)	-	-	-	(9,121)
General and administrative expenses	16,17	(51,584)	(22,145)	(8,798)	(7,900)	(90,427)
Profit before tax and voluntary retirement scheme		**57,364**	**16,057**	**15,503**	**1,624**	**90,548**
Voluntary retirement scheme						(21,236)
Profit before tax						**69,312**
Liabilities from insurance and investment contracts						
Mathematical reserves and technical insurance provisions	36	1,026,930	267,118	53,304	69,590	1,416,942
Investment contracts liabilities	37	1,355,662	-	-	-	1,355,662
Total		**2,382,592**	**267,118**	**53,304**	**69,590**	**2,772,604**

NOTE 6: EARNED (GROSS) PREMIUMS & RELATED INCOME

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Written premiums and related income	413,773	392,740	397,148	376,982
Movement in unearned premium reserve	(4,466)	(2,112)	(4,503)	(2,138)
Earned life insurance premiums	**409,307**	**390,628**	**392,645**	**374,844**
Written premiums and related income	79,224	81,724	67,865	70,283
Movement in unearned premium reserve	631	681	544	1,055
Earned motor insurance premiums	**79,855**	**82,405**	**68,409**	**71,338**
Written premiums and related income	78,970	72,373	72,420	66,581
Movement in unearned premium reserve	(4,513)	(63)	(4,199)	31
Earned fire insurance premiums	**74,457**	**72,310**	**68,221**	**66,612**
Written premiums and related income	48,630	45,098	36,642	34,149
Movement in unearned premium reserve	(1,290)	(3,414)	(958)	(3,161)
Earned premiums from other lines of business	**47,340**	**41,684**	**35,684**	**30,988**
Total gross earned premiums and related income	**610,959**	**587,027**	**564,959**	**543,782**

The increase in the earned life insurance premiums is mainly driven by the increased rates as well as new business growth.

Written premiums for year 2022, of the Group and the Parent Company, include premiums from assumed reinsurance of €90 thousands and €115 thousands respectively. The respective amounts for year 2021, were €91 thousands and €125 thousands, respectively.

Earned life insurance premiums do not include premiums from investment contracts amounting to €82,377 thousands for 2022 and €128,504 thousands for 2021 respectively, which are included in "Interest, dividends and other investment income" (see Note 8).

NOTE 7: CEDED PREMIUMS TO REINSURERS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
		(€ thousands)		
Ceded premiums to reinsurers	(9,085)	(8,313)	(7,048)	(6,443)
Movement in unearned premium reserve	623	313	629	335
Ceded life insurance premiums	**(8,462)**	**(8,000)**	**(6,419)**	**(6,108)**
Ceded premiums to reinsurers	(5,347)	(7,558)	(3,020)	(4,800)
Movement in unearned premium reserve	(11)	69	165	(8)
Ceded motor insurance premiums	**(5,358)**	**(7,489)**	**(2,855)**	**(4,808)**
Ceded premiums to reinsurers	(43,144)	(39,826)	(38,920)	(36,176)
Movement in unearned premium reserve	2,015	254	1,807	238
Ceded fire insurance premiums	**(41,129)**	**(39,572)**	**(37,113)**	**(35,938)**
Ceded premiums to reinsurers	(21,558)	(21,242)	(20,155)	(20,142)
Movement in unearned premium reserve	(112)	4,938	(201)	4,791
Ceded premiums – Other lines of business	**(21,670)**	**(16,304)**	**(20,356)**	**(15,351)**
Total ceded premiums to reinsurers	**(76,619)**	**(71,365)**	**(66,743)**	**(62,205)**

NOTE 8: INTEREST, DIVIDENDS AND OTHER INVESTMENT INCOME

	GROUP		COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Trading securities				
Dividends	113	82	-	-
Interest income	571	487	-	-
	684	**569**	**-**	**-**
Available-for-sale securities				
Dividends	6,573	1,491	6,573	1,491
Interest income	39,542	44,690	39,187	44,363
	46,115	**46,181**	**45,760**	**45,854**
Securities classified as loans and receivables				
Interest income	2,314	2,322	2,314	2,322
	2,314	**2,322**	**2,314**	**2,322**
Other investments				
Rental income	4,148	3,830	4,134	3,817
Interest on deposits and other interest income	432	1,359	463	1,375
	4,580	**5,189**	**4,597**	**5,192**
Return attributable to investment contract holders	**(16,791)**	**(15,798)**	**(16,791)**	**(15,798)**
Total interest, dividends and other investment income	**36,902**	**38,463**	**35,880**	**37,570**

Line item “Return attributable to investment contract holders” refers to DAF contracts, legacy unit –linked portfolio and endowment contracts with premium return in case of death.

The decrease in interest income is driven by the restructuring of the investment portfolio and the resulting decrease in the average yield of the portfolio’s debt instruments.

The significant increase in the dividend income from the AFS portfolio is attributed to the disposal of an unlisted security (private equity fund investment), the realised gain of which was distributed as dividend.

NOTE 9: GAINS/ (LOSSES) ON DISPOSAL OF INVESTMENTS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Available-for-sale securities				
Equities	2,382	5,730	2,382	5,730
Debt securities (bonds)	53,305	10,016	53,515	10,016
Mutual funds	(23)	12,828	(23)	12,828
Subtotal	**55,664**	**28,574**	**55,874**	**28,574**
Profit on disposal of investment property	**5,587**	**-**	**5,587**	**-**
Realized gains on Investments	**61,251**	**28,574**	**61,461**	**28,574**

During 2022, the Parent Company recognised gains of €55.874 thousands, mainly due to the sale Greek Government Bonds and to a lesser extent of equities (see Note 26).

The profit on disposal of investment property arose as result of the sale of the property located at Akti Posidonos 14-16 Street in Piraeus, which took place on 22.12.2022.

NOTE 10: UNREALISED GAINS/(LOSSES) ON INVESTMENTS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Trading				
Equities	3	1	-	-
Debt securities (bonds)	(6,066)	(2,034)	-	-
Derivatives	119	(788)	119	(788)
Subtotal	**(5,944)**	**(2,821)**	**119**	**(788)**
Other investments				
Mutual funds	(1,106)	192	-	-
Unit-Linked valuation differences	(30,840)	15,467	(23,322)	16,938
Subtotal	**(31,946)**	**15,659**	**(23,322)**	**16,938**
Total unrealized gains from investments	**(37,890)**	**12,838**	**(23,203)**	**16,150**

Valuation of investments relating to Unit-Linked products of the Parent company, exhibited a decrease within 2022, which was driven by an increase in interest rates and market losses having a negative effect on their underlying assets.

NOTE 11: IMPAIRMENT OF FINANCIAL ASSETS

Impairment losses on available for sale equity securities and mutual funds for the Group and the Parent Company are analyzed as follows:

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Impairment charge for securities				
Debt securities (bonds)	(52)	(1,224)	(52)	(1,224)
Equity securities	(2,111)	(59)	(2,111)	(59)
Mutual Funds	(1,310)	(154)	(1,310)	(154)
Investments in subsidiaries	(11,367)	-	(9,663)	-
Total impairment loss on financial assets	**(14,840)**	**(1,437)**	**(13,136)**	**(1,437)**

Compared to 2021, impairment losses on financial assets have increased by €13,403 thousands. This change is largely attributed to the impairment loss recognized for the planned sale of Garanta, the Group's subsidiary in Romania (see note 24), and to laser extent due to the increase in the impairment charge for both equity securities and mutual funds, being partly offset by a reduction in the impairment loss recognized for debt securities by €1,172 thousands.

NOTE 12: OTHER INCOME

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Gains on foreign exchange differences	435	273	450	156
Unit-Linked fees	2,894	3,544	2,894	3,544
Other fees from third parties	13	23	13	23
Gain on disposal of fixed assets	421	12	408	-
Other fees from third parties	1,617	1,333	1,233	728
Total other income	**5,380**	**5,185**	**4,998**	**4,451**

Within "gain on disposal of fixed assets" is included the gain from the sale of properties by the parent Company at 61 Astipalea Street in Athens. 68 Vassileos Georgiou Street in Argostoli of Kefallonia, 97 Ippokratous & 8 kallidromiou Street in Athens, 54 Kolindrou street in Katerini as well as the plot in kalamaki (Isthmia, Korinthia). The sale of these properties took place in 2022.

NOTE 13: POLICYHOLDER BENEFITS AND CLAIMS INCURRED

GROUP	TOTAL	REINSURER SHARE	GROUP SHARE	TOTAL	REINSURER SHARE	GROUP SHARE
		31/12/2022 (€ thousands)			31/12/2021 (€ thousands)	
Life insurance	(277,781)	415	(277,366)	(269,131)	360	(268,771)
Non-life insurance - Motor	(47,025)	2,093	(44,932)	(43,342)	2,149	(41,193)
Non-life insurance - Fire	(10,868)	6,960	(3,908)	(10,077)	6,122	(3,955)
Non-life insurance - Other lines	(11,793)	5,424	(6,369)	(8,287)	3,616	(4,671)
Paid claims	**(347,467)**	**14,892**	**(332,575)**	**(330,837)**	**12,247**	**(318,590)**
Life insurance	(15,128)	(86)	(15,214)	(248)	(608)	(856)
Non-life insurance - Motor	11,828	(2,717)	9,111	7,700	48	7,748
Non-life insurance - Fire	5,036	(3,873)	1,163	(803)	(1,671)	(2,474)
Non-life insurance - Other lines	(946)	(1,194)	(2,140)	3,601	(6,492)	(2,891)
Change in outstanding claims	**790**	**(7,870)**	**(7,080)**	**10,250**	**(8,723)**	**1,527**
Total policyholder benefits and claims incurred	**(346,677)**	**7,022**	**(339,655)**	**(320,587)**	**3,524**	**(317,063)**

PARENT COMPANY	TOTAL	REINSURER SHARE	COMPANY SHARE	TOTAL	REINSURER SHARE	COMPANY SHARE
		31/12/2022 (€ thousands)			31/12/2021 (€ thousands)	
Life insurance	(273,516)	293	(273,223)	(264,601)	195	(264,406)
Non-life insurance - Motor	(39,421)	390	(39,031)	(35,175)	542	(34,633)
Non-life insurance - Fire	(9,303)	5,994	(3,309)	(9,497)	6,060	(3,437)
Non-life insurance - Other lines	(7,962)	5,153	(2,809)	(4,569)	3,571	(998)
Paid claims	**(330,202)**	**11,830**	**(318,372)**	**(313,842)**	**10,368**	**(303,474)**
Life insurance	(14,885)	(213)	(15,098)	(375)	(218)	(593)
Non-life insurance - Motor	11,128	(1,313)	9,815	7,574	197	7,771
Non-life insurance - Fire	6,931	(5,401)	1,530	(4,051)	1,490	(2,561)
Non-life insurance - Other lines	(699)	(1,261)	(1,960)	(5,798)	2,494	(3,304)
Change in outstanding claims	**2,475**	**(8,188)**	**(5,713)**	**(2,650)**	**3,963**	**1,313**
Total policyholder benefits and claims incurred	**(327,727)**	**3,642**	**(324,085)**	**(316,492)**	**14,331**	**(302,161)**

The amount of outstanding claims for life insurance contracts has increased as a result of the increase in the claims frequency after the end of the covid-19 pandemic.

NOTE 14: COMMISSION EXPENSES

GROUP	COMMISSION EXPENSE	COMMISSION INCOME FROM REINSURERS	TOTAL	COMMISSION EXPENSE	COMMISSION INCOME FROM REINSURERS	TOTAL
		31/12/2022 (€ thousands)			*31/12/2021 (€ thousands)*	
Life insurance	(65,911)	3,580	(62,331)	(62,230)	3,258	(58,972)
Non-life insurance - Motor	(12,573)	118	(12,455)	(12,556)	191	(12,365)
Non-life insurance - Fire	(13,007)	7,695	(5,312)	(10,787)	7,783	(3,004)
Non-life insurance - Other lines	(6,872)	1,779	(5,093)	(6,548)	1,201	(5,347)
Total commission expenses	**(98,363)**	**13,172**	**(85,191)**	**(92,121)**	**12,433**	**(79,688)**

PARENT COMPANY	COMMISSION EXPENSE	COMMISSION INCOME FROM REINSURERS	TOTAL	COMMISSION EXPENSE	COMMISSION INCOME FROM REINSURERS	TOTAL
		31/12/2022			31/12/2021	
		(€ thousands)			(€ thousands)	
Life insurance	(63,062)	2,593	(60,469)	(59,435)	2,208	(57,227)
Non-life insurance - Motor	(10,676)	-	(10,676)	(10,749)	-	(10,749)
Non-life insurance - Fire	(11,637)	6,369	(5,268)	(9,574)	6,342	(3,232)
Non-life insurance - Other lines	(4,314)	1,285	(3,029)	(4,248)	828	(3,420)
Total commission expenses	**(89,689)**	**10,247**	**(79,442)**	**(84,006)**	**9,378**	**(74,628)**

NOTE 15: MOVEMENT IN MATHEMATICAL INSURANCE RESERVES

GROUP	TOTAL	REINSURERS' SHARE	GROUP SHARE	TOTAL	REINSURERS' SHARE	GROUP SHARE
		31/12/2022			31/12/2021	
		(€ thousands)			(€ thousands)	
Movement in mathematical insurance reserves	(13,251)	(6)	(13,257)	(11,480)	(108)	(11,588)
Total movement in mathematical insurance reserves	**(13,251)**	**(6)**	**(13,257)**	**(11,480)**	**(108)**	**(11,588)**

PARENT COMPANY	TOTAL	REINSURERS' SHARE	COMPANY SHARE	TOTAL	REINSURERS' SHARE	COMPANY SHARE
		31/12/2022			31/12/2021	
		(€ thousands)			(€ thousands)	
Movement in mathematical insurance reserves	(13,670)	(4)	(13,674)	(9,116)	(5)	(9,121)
Total movement in mathematical insurance reserves	**(13,670)**	**(4)**	**(13,674)**	**(9,116)**	**(5)**	**(9,121)**

NOTE 16: GENERAL AND ADMINISTRATIVE EXPENSES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Personnel costs	(48,791)	(70,941)	(41,551)	(64,203)
Third party fees	(31,653)	(13,918)	(31,053)	(13,369)
Advertising and promotion	(3,846)	(3,262)	(3,677)	(3,144)
Taxes / duties	(1,739)	(1,571)	(1,693)	(1,519)
Depreciation & impairment of assets	(9,199)	(10,431)	(8,335)	(9,534)
Telecommunications-Postage	(4,001)	(5,524)	(3,899)	(5,410)
Rentals	(261)	(175)	(183)	(150)
Transport and travel expenses	(861)	(971)	(747)	(870)
Stationery	(661)	(551)	(514)	(437)
Repairs and maintenance	(1,386)	(1,631)	(1,202)	(1,434)
Insurance premiums	(779)	(480)	(741)	(429)
Provision for non-performing receivables	595	2,375	557	2,315
Provision for ligitation	(442)	231	(407)	252
Value of granted contracts	(900)	(2,087)	(900)	(2,087)
Other	(8,184)	(5,924)	(6,889)	(4,949)
Total general and administrative expenses	**(112,108)**	**(114,860)**	**(101,234)**	**(104,968)**

Personnel costs are analyzed as follows:

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Wages and salaries	(41,567)	(35,721)	(35,371)	(29,801)
Obligatory social security contributions	(8,756)	(9,693)	(8,271)	(9,218)
Defined benefit plan	4,307	(22,912)	4,307	(22,912)
Premiums of company's employees DAF contracts	(2,774)	(2,615)	(2,216)	(2,272)
Total personnel costs	**(48,791)**	**(70,941)**	**(41,551)**	**(64,203)**

Line item “Premiums of company’s employees DAF contracts” includes contributions of the Parent Company for 2022 of €777 thousands (€770 thousands for 2021), relating to the group policy of the personnel’s defined contribution.

During 2022, the Group had an average of 790 employees, while the Parent Company had an average of 575 (2021: 893 employees for the Group, and 673 employees for the Parent Company).

With respect to the line item "Defined benefit plan" of the above table, the change compared to the year 2021 is due to the voluntary retirement program implemented by the Company, with a total cost of €21.2 million.

The increase in “third party fees” as presented in the first table above is primarily driven by the increase in consultancy fees incurred in connection with the projects undertaken by the Group regarding the digitalization and transformation of its Parent Company.

Line item “other” in the first table above includes an amount of €1,210 thousands that relates to the donation made by the parent company of the Memorial Site 1941-1941 (Kommandatur detention centres during the German Occupation), which has been designated preserved as historical monument (as per Greek Official Gazette 233/8/1991) and is located on the company’s own property at Korai 4 Street in Athens. In accordance with the donation deed, 50% of the property has been transferred to the Ministry of Culture and Sports (General Directorate of Antiquities and Cultural Heritage) and the other 50% to the Municipality of Athens.

NOTE 17: FINANCE COSTS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Interest on subordinated loan	(12,226)	(5,925)	(12,226)	(5,925)
Interest expense to reinsurers	(427)	(427)	(427)	(427)
Other	(618)	(547)	(397)	(342)
Total finance costs	**(13,271)**	**(6,899)**	**(13,050)**	**(6,694)**

The increase in the interest on subordinated debt is attributed to the increased interest expense incurred in 2022 (as compared with 2021 during which interest was accrued for a shorter period) in connection with the bond loan issued by the parent company on 28.09.2021 that is entirely held by NBG (see note 39).

NOTE 18: INCOME TAX EXPENSE

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Current tax - current year	(20,627)	(13,095)	(20,166)	(12,571)
Current tax - previous years	1,263	11,626	1,263	11,626
Deferred tax	(8,160)	(15,662)	(8,803)	(16,448)
Total income tax	**(27,524)**	**(17,131)**	**(27,706)**	**(17,393)**

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Profit before tax	**21,109**	**69,117**	**32,280**	**69,312**
Tax calculated based on the current tax rate	**(4,644)**	**(15,206)**	**(7,102)**	**(15,249)**
Effect of tax rate change in Greece	-	(7,393)	-	(7,393)
Effect of different tax rates in other countries	(36)	219	-	-
Income/expenses not subject to taxation	(84)	2,613	(84)	2,613
Non tax - deductible expenses	(1,617)	2	(1,617)	2
Dividend distribution of prior year income	(20,166)	-	(20,166)	-
Previous years' income tax	1,263	2,328	1,263	2,328
Other differences	(2,240)	306	-	306
Tax calculated based on the effective tax rate	**(27,524)**	**(17,131)**	**(27,706)**	**(17,393)**
Applicable tax rate	22%	22%	22%	22%
Effective tax rate	130%	25%	86%	25%

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	2017 - 2022
ETHNIKI GENERAL INSURANCE CYPRUS LTD	CYPRUS	2012 - 2022
ETHNIKI INSURANCE CYPRUS LTD	CYPRUS	2012 - 2022
NATIONAL INSURANCE AGENTS & CONSULTANTS LTD	CYPRUS	2008 - 2022
SOCIETATE COMERCIALA GARANTA ASIGURARI S.A.	ROMANIA	2003 - 2022

NOTE 19: TAX IMPACT ON OTHER COMPREHENSIVE INCOME

GROUP		31/12/2022			31/12/2021	
	Gross	Tax	Net	Gross	Tax	Net
			(€ thousands)			
Available-for-sale securities	(662,668)	130,940	(531,728)	(119,838)	30,965	(88,873)
Post retirement benefit plans	9,045	(1,990)	7,055	(1,225)	47	(1,178)
Currency translation differences	(161)	-	(161)	(264)	-	(264)
Other comprehensive income of period	**(653,784)**	**128,950**	**(524,834)**	**(121,327)**	**31,012**	**(90,315)**

PARENT COMPANY		31/12/2022			31/12/2021	
	Gross	Tax	Net	Gross	Tax	Net
			(€ thousands)			
Available-for-sale securities	(661,478)	130,746	(530,732)	(119,109)	30,851	(88,258)
Post retirement benefit plans	9,045	(1,990)	7,055	(1,225)	47	(1,178)
Other comprehensive income of period	**(652,433)**	**128,756**	**(523,677)**	**(120,334)**	**30,898**	**(89,436)**

The “available-for-sale securities” line item of the Group and the Parent Company does not include for 2022 an amount of €3,473 thousands (2021: €1,437 thousands) relating to the impairment losses of available-for-sale securities (equities, mutual funds and bonds), which is included in the statement of total comprehensive income of the corresponding period (see Note 11).

NOTE 20: PROPERTY AND EQUIPMENT / ASSETS HELD FOR SALE

TANGIBLE ASSETS

GROUP	Land	Buildings	Right of use assets	Vehicles & equipment (€ thousands)	Leasehold improvements	Assets under construction	Total
Cost							
Balance at 1/1/2021	**57,063**	**101,624**	**4,029**	**30,092**	**1,656**	**2,625**	**197,089**
Additions	11	534	475	640	12	11	1,683
Transfers	(292)	615	-	-	-	(924)	(601)
Disposals & write offs	-	-	(240)	(91)	(228)	-	(559)
Balance at 31/12/2021	**56,782**	**102,773**	**4,264**	**30,641**	**1,440**	**1,712**	**197,612**
Accumulated depreciation and impairment							
Balance at 1/1/2021	**(858)**	**(44,363)**	**(1,885)**	**(27,403)**	**(1,519)**	**-**	**(76,027)**
Disposals & write offs	-	-	233	91	227	-	551
Transfers' Depreciation charge	(16)	60	-	-	-	-	44
Depreciation charge	-	(2,653)	(1,132)	(930)	(45)	-	(4,760)
Impairment charge	16	(15)	-	-	-	-	1
Balance at 31/12/2021	**(858)**	**(46,971)**	**(2,784)**	**(28,242)**	**(1,337)**	**-**	**(80,192)**
Net book value at 31/12/2021	**55,924**	**55,802**	**1,480**	**2,399**	**103**	**1,712**	**117,420**
Cost							
Balance at 1/1/2022	**56,782**	**102,773**	**4,264**	**30,641**	**1,440**	**1,712**	**197,612**
Additions	-	254	1,187	824	16	14	2,295
Transfers	(3,139)	(3,205)	(243)	(1,001)	-	-	(7,588)
Disposals & write offs	(201)	(1,011)	(135)	(346)	(19)	-	(1,712)
Balance at 31/12/2022	**53,442**	**98,811**	**5,073**	**30,118**	**1,437**	**1,726**	**190,607**
Accumulated depreciation and impairment							
Balance at 1/1/2022	**(858)**	**(46,971)**	**(2,784)**	**(28,242)**	**(1,337)**	**-**	**(80,191)**
Disposals & write offs	-	303	77	332	19	-	731
Transfers' Depreciation charge	832	1,115	142	695	-	-	2,784
Depreciation charge	-	(2,600)	(966)	(979)	(41)	-	(4,586)
Balance at 31/12/2022	**(26)**	**(48,153)**	**(3,531)**	**(28,194)**	**(1,359)**	**-**	**(81,263)**
Net book value at 31/12/2022	**53,416**	**50,658**	**1,542**	**1,924**	**78**	**1,726**	**109,344**

PARENT COMPANY	Land	Buildings	Right of use assets	Vehicles & equipment	Leasehold improvements	Assets under construction	Total
				(€ thousands)			
Cost							
Balance at 1/1/2021	**56,153**	**95,106**	**2,637**	**26,879**	**1,482**	**2,625**	**184,882**
Additions	11	445	349	503	12	11	1,331
Transfers	(292)	615	-	-	-	(924)	(601)
Disposals & write offs	-	-	(219)	-	(228)	-	(447)
Balance at 31/12/2021	**55,872**	**96,166**	**2,767**	**27,382**	**1,266**	**1,712**	**185,165**
Accumulated depreciation and impairment							
Balance at 1/1/2021	**(796)**	**(42,030)**	**(1,178)**	**(24,684)**	**(1,433)**	**-**	**(70,121)**
Disposals & write offs	-	-	81	-	227	-	308
Transfers' Depreciation charge	-	45	-	-	-	-	45
Depreciation charge	-	(2,484)	(720)	(787)	(33)	-	(4,024)
Balance at 31/12/2021	**(796)**	**(44,469)**	**(1,817)**	**(25,471)**	**(1,239)**	**-**	**(73,792)**
	-						
Net book value at 31/12/2021	**55,076**	**51,697**	**950**	**1,911**	**27**	**1,712**	**111,373**
Cost							
Balance at 1/1/2022	**55,872**	**96,166**	**2,767**	**27,382**	**1,266**	**1,712**	**185,165**
Additions	-	235	985	668	16	14	1,918
Transfers	(2,799)	(428)	-	-	-	-	(3,227)
Disposals & write offs	(201)	(1,011)	(135)	(335)	(19)	-	(1,701)
Balance at 31/12/2022	**52,872**	**94,962**	**3,617**	**27,715**	**1,263**	**1,726**	**182,155**
	-	-		-			
Accumulated depreciation and impairment							
Balance at 1/1/2022	**(796)**	**(44,469)**	**(1,817)**	**(25,471)**	**(1,239)**	**-**	**(73,792)**
Disposals & write offs	-	303	77	321	19	-	720
Transfers' Depreciation charge	767	147	-	-	-	-	914
Depreciation charge	-	(2,485)	(671)	(911)	(28)	-	(4,095)
Balance at 31/12/2022	**(29)**	**(46,504)**	**(2,411)**	**(26,061)**	**(1,248)**	**-**	**(76,253)**
Net book value at 31/12/2022	**52,843**	**48,458**	**1,206**	**1,654**	**15**	**1,726**	**105,902**

Depreciation and impairment charges are recognized under General and Administrative Expenses in the statement of total comprehensive income.

The management of the Parent Company engaged certified independent appraisers to value some of its own-used property (103-105 Syggrou Avenue (building A, secured parking areas) - Skouleniou 1 ,Athens – Voulis 7, Athens - 137 Syggrou Avenue, Athens – Mitropoleos 13 and Roghoti Street, Thessaliniki – Maizonos and Zaimi Steeet, Patra – 28th October 46 Street, Tripoli – 135 Syggrou Anenue & Kratitos, Athens).

The estimated fair value of the Parent Company's own-used property as at 31st December 2022 was set at €129,339 thousands, whereas property held for sale was fair valued at €9,570 thousands. The fair value of properties held for sale at 20 Iasonos & Korai Street, Argonafton, Volos – Kouklia, Pafos Cyprus (residence) – Frangolaggada, Argolida (plot) – Stifogianni, Amiros, Magnisia (plot) – 6 Ethnikis Antistaseos Street (Vlachoutsi 7) – 144 Vassilissis Olgas Street, Thessaloniki (residence) – 17 Pol. Konstanta Street, Corfu was based on the proposed selling price, while the fair value of the municipality of Hellenikon property was set by reference to the 31.365/20.06.2017 Preliminary contract.

Line items "Tansfers" and "Transfers – Depreciation Charge" include (a) reclassifications of investment properties with a depreciable value of €1,686 thousands and (b) available-for-sale properties with a depreciable value of €1,536 thousands.

The total gains upon disposal of the following properties amounted to €414 thousands (Properties - 61 Astipalea Street in Athens, 68 Vassileos Georgiou Street in Argostoli of Kefallonia, 97 Ippokratous & kallidromiou Street in Athens, 54 Kolindrou Street, Katerini, and the plot in kalamaki, Istmia, Korinthias – see note 12).

ASSETS HELD-FOR-SALE

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Plot of Elliniko - 35th str.	6,120	6,120	6,120	6,120
20 Iasonos str., Korai, Argonafton - Volos	1,070	1,070	1,070	1,070
Kouklia VILAGE HA POTAMI No 19 Pafou, Cyprus	423	423	423	423
97 Ippokratous & 8 Kall/miou str. - Athens	-	81	-	81
Kalamaki - Isthmia Korinthias (plot)	-	59	-	59
54 Kolindrou str., Katerini	-	74	-	74
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	-
17 Pol. Konstanta str. - Kerkyra	298	-	298	-
Total assets held for sale	**8,331**	**7,827**	**8,331**	**7,827**

As regards the above mentioned property items, a preliminary contract was signed on 20/06/2017 for property item “Plot of Hellenikon - 35th str.” with “KTIRIAKES YPODOMES SA.”, providing a gradual settlement of the Company’s claims (amounting to €6,120 thousands, plus interest), by a series of installments. The aforementioned claim was paid in full in 2019, however, as at 31/12/2022 the legal transfer of the property has not been finalised (see note 38).

For the properties at 6 Ethnikis Antistaseos Street, 7 Vlachoutsi (Arta) and 17 Pol, Konstanta (Corfu), owned by the parent Company, previous impairment losses amounting to € 91 thousands were reversed, € 72 thousands of which was attributed to buildings and the rest of € 19 thousands to land.

NOTE 21: INVESTMENT PROPERTY

	GROUP				PARENT COMPANY			
	Land	Buildings	Assets under construction	Total	Land	Buildings	Assets under construction	Total
				(€ thousands)				
Cost								
Balance at 1/1/2021	**49,136**	**97,706**	**-**	**146,842**	**49,019**	**97,061**	**-**	**146,080**
Transfers	(2,046)	(551)	-	(2,597)	(2,046)	(551)	-	(2,597)
Additions	-	15	-	15	-	15	-	15
Balance at 31/12/2021	**47,090**	**97,170**	**-**	**144,260**	**46,973**	**96,525**	**-**	**143,498**
Accumulated depreciation and impairment								
Balance at 1/1/2021	**(2,356)**	**(62,293)**	**-**	**(64,649)**	**(2,356)**	**(61,993)**	**-**	**(64,349)**
Depreciation charge	-	(2,742)	-	(2,742)	-	(2,717)	-	(2,717)
Disposals	976	557	-	1,533	976	551	-	1,527
Impairment charge	-	6	-	6	-	-	-	-
Balance at 31/12/2021	**(1,380)**	**(64,472)**	**-**	**(65,852)**	**(1,380)**	**(64,159)**	**-**	**(65,539)**
Net book value at 31/12/2021	**45,710**	**32,698**	**-**	**78,408**	**45,593**	**32,366**	**-**	**77,959**
Cost								
Balance at 1/1/2022	**47,090**	**97,170**	**-**	**144,260**	**46,973**	**96,525**	**-**	**143,498**
Transfers	2,306	(645)	-	1,661	2,423	-	-	2,423
Disposals	(2,790)	(7,465)	-	(10,255)	(2,790)	(7,465)	-	(10,255)
Additions	-	9	-	9	-	9	-	9
Balance at 31/12/2022	**46,606**	**89,069**	**-**	**135,675**	**46,606**	**89,069**	**-**	**135,675**
Accumulated depreciation and impairment								
Balance at 1/1/2022	**(1,380)**	**(64,472)**	**-**	**(65,852)**	**(1,380)**	**(64,159)**	**-**	**(65,539)**
Depreciation charge	-	(2,619)	-	(2,619)	-	(2,619)	-	(2,619)
Transfers	(737)	313	-	(424)	(737)	-	-	(737)
Disposals	(1)	5,781	-	5,780	(1)	5,781	-	5,780
Impairment charge	919	260	-	1,179	919	260	-	1,179
Balance at 31/12/2022	**(1,199)**	**(60,737)**	**-**	**(61,936)**	**(1,199)**	**(60,737)**	**-**	**(61,936)**
Net book value at 31/12/2022	**45,407**	**28,332**	**-**	**73,739**	**45,407**	**28,332**	**-**	**73,739**

Depreciation and impairment charges are recognized within the line "General and Administrative Expenses" in the statement of total comprehensive income.

Rental income for the Group and the Parent Company for the year ended 31st December 2022, amounted to €4,148 thousands and €4,134 thousands respectively. For 2021, rental income for the Group and the Parent Company amounted to €3,830 thousands and €3,817 thousands respectively (see Note 8).

The fair value of investment properties held at 31.12.2022 is €103,041 thousands (depreciable value: €73,739 thousands).

The management of the Parent Company had engaged certified independent appraisers to value certain investment property owned by the Group (103-105 Syggrou Ave. (building B, Conference center), Athens – 4 Korai str., 1 Efpolidos and Apellou str., Athens – 8 Karageorgi Servias str., Athens – 7 Merlin str., Athens – 20 Themistokleous str., Holargos – 8 Paleon Patron Germanou str., Filothei – 1-3 Eftichidou and Frinis str., Paggrati – 32 Eftichidou str., Paggrati – 5 Mitropoleos str., Athens – 7 Ithakis str., Alimos, Attiki , the fair value of which at 31.12.2022 was determined at €95,012 thousands (carrying amount: €66,689 thousands) .

On 22.12.2022 the Parent Company sold its property located at Akti Posidonos 14-16 Street in Piraeus at a price of €8,850 thousands, with the gain on disposal being €5,587 thousands (see note 9).

During the reporting period of 2022, for investment properties held by the Parent Company, previous impairment losses amounting to €1,179 thousands were reversed, €919 thousands of which was attributed to land and the rest of €260 thousands to buildings.

NOTE 22: INTAGIBLE ASSETS

	GROUP			PARENT COMPANY		
	Goodwill	Software	Total	Goodwill	Software	Total
			(€ thousands)			
Cost						
Balance at 1/1/2021	**671**	**51,995**	**52,666**	**-**	**50,366**	**50,366**
Additions	-	4,132	4,132	-	3,991	3,991
Disposals & write offs	-	(36)	(36)	-	-	-
Balance at 31/12/2021	**671**	**56,091**	**56,762**	**-**	**54,357**	**54,357**
Accumulated amortization and impairment						
Balance at 1/1/2021	**(187)**	**(42,410)**	**(42,597)**	**-**	**(41,343)**	**(41,343)**
Amortization charge	-	(2,935)	(2,935)	-	(2,793)	(2,793)
Disposals & write offs	-	36	36	-	-	-
Balance at 31/12/2021	**(187)**	**(45,309)**	**(45,496)**	**-**	**(44,136)**	**(44,136)**
Net book value at 31/12/2021	**484**	**10,782**	**11,266**	**-**	**10,221**	**10,221**
Cost						
Balance at 1/1/2022	**671**	**56,091**	**56,762**	**-**	**54,357**	**54,357**
Additions	-	5,208	5,208	-	5,001	5,001
Transfers	(671)	(864)	(1,535)	-	-	-
Balance at 31/12/2022	**-**	**60,435**	**60,435**	**-**	**59,358**	**59,358**
Accumulated amortization and impairment						
Balance at 1/1/2022	**(187)**	**(45,309)**	**(45,496)**	**-**	**(44,136)**	**(44,136)**
Amortization charge	-	(2,933)	(2,933)	-	(2,889)	(2,889)
Transfers	187	366	553	-	-	-
Balance at 31/12/2022	**-**	**(47,876)**	**(47,876)**	**-**	**(47,025)**	**(47,025)**
Net book value at 31/12/2022	**-**	**12,559**	**12,559**	**-**	**12,333**	**12,333**

Amortization charges for the period are recognized under General and Administrative Expenses in the statement of total comprehensive income.

Additions relate to the expenditure incurred for the operating improvement in the parent company's software programs.

NOTE 23: DEFERRED ACQUISITION COSTS (DAC)

Commissions and other acquisition costs both of new contracts and renewals that correspond to the subsequent years are analysed by line of business as follows:

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Deferred acquisition costs - Life insurance	35,529	35,846	35,104	35,330
Deferred acquisition costs - Non-life insurance	9,163	9,129	7,221	6,460
Total deferred acquisition costs	**44,692**	**44,975**	**42,325**	**41,790**

MOVEMENT OF ACQUISITION COSTS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Deferred acquisition costs - Life and Non Life insurance - at beginning of the period	**44,975**	**43,508**	**41,790**	**40,524**
Movement in new production	20,695	21,263	21,513	21,062
Other movements during the period	(20,978)	(19,796)	(20,978)	(19,796)
Deferred acquisition costs - Life and Non Life insurance - at end of the period	**44,692**	**44,975**	**42,325**	**41,790**

NOTE 24: INVESTMENT IN SUBSIDIARIES

		31/12/2022		31/12/2021	
	Country	% of ownership	Carrying value	% of ownership	Carrying value
Participation			*(€ thousands)*		
Parent Company					
SOCIETATE COMERCIALA GARANTA ASIGURARI S.A.	Romania	96,70%	-	94.96%	6,528
ETHNIKI INSURANCE (CYPRUS) LTD	Cyprus	100.00%	5,704	100.00%	5,704
Total investments in subsidiaries			**5,704**		**12,232**

Ethniki Insurance (Cyprus) Ltd holds 100% of Ethniki General Insurance (Cyprus) Ltd and 100% of National Insurance Agents & Consultants Ltd both registered in Cyprus. These companies conduct insurance and insurance brokerage activities respectively.

Subsidiaries are consolidated by applying the full consolidation method in accordance with IFRS 10.

As at 31.12.2021, the Parent Company held a shareholding parentage of 94.96% in Garanta Asigurari, the Group's foreign subsidiary in Romania. During 2022, the Parent Company increased its share by participating in two capital increases of €1,000 and €2,100 thousands resulting in it having 96.7% of Garanta's voting power as at 31.12.2022. During the last quarter of 2022, the Parent Company assessed the potential divestment from the subsidiary and as a result management has committed to a plan to sell the company. As a consequence of this, the investment in the subsidiary has been classified as a held-for-sale asset and an impairment loss of €9,663 thousands has been recognised, effectively reducing the investment value to zero (see note 11).

ASSETS AND LIABILITIES HELD FOR SALE

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Assets held for sale				
SOCIETATE COMERCIALA GARANTA ASIGURARI S.A.	30,793		-	

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Liabilities directly associated with assets held for sale				
SOCIETATE COMERCIALA GARANTA ASIGURARI S.A.	30,793		-	

What is more, it is noted that the planned sale of the foreign subsidiary, as described above, is not presented separately as discontinued operation in the Group's consolidated income statement. As at 31.12.2022, the group has assessed that (a) the percentage on its total assets in relation to the Group's total assets, and (b) the percentage of its gross revenue to the Group's total gross revenue are both immaterial for the planned disposal of the subsidiary to warranty being reported separately as discontinued operation.

NOTE 25: DEFFERED TAX ASSETS / LIABILITIES

GROUP	Balance at 31/12/2020	Recognized in profit or loss	Recognized in equity	Balance at 31/12/2021	Recognized in profit or loss	Recognized in equity	Disposal of subsidiaries	Balance at 31/12/2022
				(€ thousands)				
Amortisation adjustment for intangible assets	16	(1)	-	15	2	-	-	17
Carried forward tax losses	-	-	-	-	8,924	-	-	8,924
Post retirement benefits	710	4,343	47	5,100	(4,929)	(1,990)	-	(1,819)
Provision for non-performing receivables	11,823	(10,794)	-	1,029	(1,000)	-	(1)	28
Depreciation adjustment for investment property	(5,701)	952	-	(4,749)	506	-	(35)	(4,278)
Depreciation adjustment for property & equipment	(4,658)	408	-	(4,250)	(183)	-	(11)	(4,444)
Special tax reserve - trading securities	(218)	191	-	(27)	(25)	-	-	(52)
Special tax reserve - securities classified as loans and receivables	(20)	(1)	-	(21)	(1)	-	-	(22)
Special tax reserve - available-for-sale securities	(65,609)	(3,561)	30,851	(38,319)	(11,583)	130,746	7	80,851
PSI loss (Greek Law 4046/12)	62,307	(7,912)	-	54,395	(2,861)	-	-	51,534
Other provisions	1,731	500	-	2,231	2,347	-	(533)	4,045
Deferred tax assets	**381**	**(15,875)**	**30,897**	**15,403**	**(8,803)**	**128,756**	**(573)**	**134,783**
Depreciation adjustment for property & equipment	(11)	11	-	-	-	-	-	-
Depreciation adjustment for investment property	(22)	22	-	-	(9)	-	9	-
Other provisions	123	(123)	-	-	(440)	-	440	-
Special tax reserve - available-for-sale securities	123	(123)	-	-	(194)	-	194	-
Deferred tax liabilities	**213**	**(213)**	**-**	**-**	**(643)**	**-**	**643**	**-**

PARENT COMPANY	Balance at 31/12/2020	Recognized in profit or loss	Recognized in equity	Balance at 31/12/2021	Recognized in profit or loss	Recognized in equity	Balance at 31/12/2022
				(€ thousands)			
Amortisation adjustment of intangible assets	16	(1)	-	15	2	-	17
Carried forward tax losses	-	-	-	-	8,924	-	8,924
Post retirement benefits	710	4,343	47	5,100	(4,929)	(1,990)	(1,819)
Provision for non-performing receivables	11,822	(10,794)	-	1,028	(1,000)	-	28
Depreciation adjustment for investment property	(5,701)	917	-	(4,784)	506	-	(4,278)
Depreciation adjustment for property & equipment	(4,658)	397	-	(4,261)	(183)	-	(4,444)
Special tax reserve - trading securities	(218)	191	-	(27)	(25)	-	(52)
Special tax reserve - securities classified as loans and receivables	(20)	(1)	-	(21)	(1)	-	(22)
Special tax reserve - available-for-sale securities	(65,609)	(3,554)	30,851	(38,312)	(11,583)	130,746	80,851
PSI loss (Greek Law 4046/12)	62,307	(7,912)	-	54,395	(2,861)	-	51,534
Other provisions	1,732	(34)	-	1,698	2,347	-	4,045
Deferred tax assets	**381**	**(16,448)**	**30,897**	**14,830**	**(8,803)**	**128,756**	**134,783**

Based on the Group's accounting principles and estimates for future taxable profits, the above deferred tax assets, concerning temporary tax deductible differences, are deemed recoverable. Management's assessment that the deferred tax asset is recoverable is described in Note 3.3.

The impairment loss under Greek Law 4046/2012 that arose as a result of the exchange of Greek Government Bonds ("GGBs"), is considered a tax deductible expense and is amortized in 30 equal annual installments. The unutilized debit difference as at 31st December 2022 amounts to €234,886 thousands.

The Group and the Parent Company have offset deferred tax assets and liabilities per entity on separate basis, as the local tax authorities of each country provide the right to offset the income tax assets and liabilities per entity and only if the deferred tax assets and liabilities relate to the same tax authority.

NOTE 26: AVAILABLE-FOR-SALE SECURITIES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
		(€ thousands)		
DEBT SECURITIES (BONDS)				
Greek Government	201,267	1,037,382	201,267	1,037,382
Foreign Government	1,390,619	1,201,663	1,390,619	1,191,839
Corporate - Listed	439,096	502,066	439,096	502,066
	2,030,982	**2,741,111**	**2,030,982**	**2,731,287**
EQUITIES				
Listed	28,170	25,238	28,170	25,238
Non-listed	13,738	15,939	13,738	15,939
	41,908	**41,177**	**41,908**	**41,177**
MUTUAL FUNDS				
Greek	195,761	219,131	195,761	219,131
Other EU	239,607	203,048	239,607	203,048
	435,368	**422,179**	**435,368**	**422,179**
Total available-for-sale securities	**2,508,258**	**3,204,467**	**2,508,258**	**3,194,643**

Available for sale securities are categorized according to IFRS 13 in the following fair value hierarchy levels:

	GROUP					PARENT COMPANY				
	LEVEL 1	LEVEL 2	LEVEL 3	Fair value not available	TOTAL	LEVEL 1	LEVEL 2	LEVEL 3	Fair value not available	TOTAL
					(€ thousands)					
Available for sale										
31.12.2022	1,456,494	1,038,026	13,738	-	**2,508,258**	1,456,494	1,038,026	13,738	-	**2,508,258**
31.12.2021	1,466,617	1,721,911	15,939	-	**3,204,467**	1,466,617	1,712,087	15,939	-	**3,194,643**

The decrease in the available for-sale securities portfolio during 2022, as compared to 2021, is largely attributed to the reduction in the value of bonds, which comprise the majority of the group's investment portfolio. This, in turn, was driven by an increase in interest rates as result of the monetary policy response to inflationary pressures by the central banks, leading to substantial losses in the global financial markets.

During 2022, available for-sale portfolio securities worth of €184,558 thousands were transferred from Level 1 to Level 2. During 2021, available for-sale portfolio securities worth of €36,068 thousands were transferred from Level 1 to Level 2, while available for-sale portfolio securities worth of €36,542 thousands were transferred from Level 2 to Level 1.

The available for-sale portfolio also includes non-listed shares which relate to investments in specific investment schemes (Private Equity Funds), and are valued according to the Group's equity shareholding percentage. The valuation methodology of the equities in the investment schemes follows the principals of the international financial reporting standards. These investment funds have a maximum total duration of 10 years, are not listed on regulated markets and invest in equities and/or bonds issued by small and medium Greek enterprises with prospects for dynamic growth. On 31 December 2022 their fair value amounted to €13,738 thousands, while on 31 December 2021 amounted to €15,931 thousands.

In 2008 the Parent Company transferred shares from the trading portfolio to the available for sale portfolio. On 31 December 2022, the carrying amount and the fair value of securities transferred in 2008 and are still held by the Parent Company, was €59 thousands and €59 thousands respectively. Had those securities never been removed and impaired, an additional loss of (€11) thousands would have been recognised within valuation losses of the investment portfolio.

NOTE 27: SECURITIES AT FAIR VALUE THROUGH PROFIT OR LOSS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
		(€ thousands)		
TRADING SECURITIES				
Debt securities (bonds)				
Foreign Government	16,506	19,111	-	-
Greek Corporate - Listed	546	637	-	-
	17,052	**19,748**	**-**	**-**
Equities				
Listed	7	4	-	-
Non-listed	-	6	-	-
	7	**10**	**-**	**-**
Total trading securities	**17,059**	**19,758**	**-**	**-**
UNIT-LINKED				
Mutual Funds	183,489	159,832	182,218	158,399
Debt securities (bonds)	90,658	106,917	74,008	85,160
Equities	4,303	4,775	-	-
Deposits	337,167	341,275	326,899	333,479
Total Unit - Linked	**615,617**	**612,799**	**583,125**	**577,038**
FVTPL SECURITIES excl. TRADING SECURITIES AND UNIT-LINKED				
Mutual funds				
Foreign	6,411	7,367	-	-
Total FVTPL securities excl. trading securities and Unit - Linked	**6,411**	**7,367**	**-**	**-**
Derivative financial instruments	**239**	**119**	**239**	**119**
Total securities at fair value through profit or loss	**639,326**	**640,043**	**583,364**	**577,157**

Securities at fair value through profit or loss are categorized according to IFRS 13 in the following fair value hierarchy levels:

	GROUP				
	LEVEL 1	LEVEL 2	LEVEL 3	Fair value not available	TOTAL
			(€ thousands)		
31.12.2022					
Unit-Linked	513,420	102,197	-	-	615,617
Other FVTPL	-	6,411	-	-	6,411
Trading securities	7	17,052	-	-	17,059
Derivative financial instruments	-	239	-	-	239
Total	**513,427**	**125,899**	**-**	**-**	**639,326**
31.12.2021					
Unit-Linked	506,927	105,872	-	-	612,799
Other FVTPL	7,367	-	-	-	7,367
Trading securities	4	19,748	-	6	19,758
Derivative financial instruments	-	119	-	-	119
Total	**514,298**	**125,739**	**-**	**6**	**640,043**

	PARENT COMPANY				
	LEVEL 1	LEVEL 2	LEVEL 3	Fair value not available	TOTAL
	(€ thousands)				
31.12.2022					
Unit-Linked	509,117	74,008	-	-	583,125
Trading securities	-	-	-	-	-
Derivative financial instruments	-	239	-	-	239
Total	**509,117**	**74,247**	**-**	**-**	**583,364**
31.12.2021					
Unit-Linked	497,539	79,499	-	-	577,038
Trading securities	-	-	-	-	-
Derivative financial instruments	-	119	-	-	119
Total	**497,539**	**79,618**	**-**	**-**	**577,157**

The reclassifications in unit linked from level 2 to level 1 in year 2021, of the above table, were made in order to provide more relevant presentation and enhance the comparability of the financial statements.

NOTE 28: SECURITIES CLASSIFIED AS LOANS AND RECEIVABLES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
DEBT SECURITIES (BONDS)				
Greek Government	40,876	41,018	40,876	41,018
Total securities classified as loans and receivables	**40,876**	**41,018**	**40,876**	**41,018**

The fair value of the securities classified as loans and receivables, and their categorisation according to IFRS 13, for 2022 has as follows: €43,567 thousands in level 2. As at year end 2021, the fair value of the securities classified as loans and receivables was €52,851 thousands and categorized in level 2.There were no securities transferred from Level 1 to Level 2 or 3 during 2022.

NOTE 29: PORTFOLIO ANALYSIS BY TYPE OF INTEREST RATE

GROUP 31/12/2022	Available for sale	Trading	Held-to-maturity	Loans & receivables	TOTAL
		(€ thousands)			
Fixed interest rate	2,003,238	17,052	-	40,876	2,061,166
Variable interest rate	27,744	-	-	-	27,744
Total	**2,030,982**	**17,052**	**-**	**40,876**	**2,088,910**

GROUP 31/12/2021	Available for sale	Trading	Held-to-maturity	Loans & receivables	TOTAL
		(€ thousands)			
Fixed interest rate	2,741,111	19,748	-	41,018	2,801,877
Total	**2,741,111**	**19,748**	**-**	**41,018**	**2,801,877**

PARENT COMPANY 31/12/2022	Available for sale	Trading	Held-to-maturity	Loans & receivables	TOTAL
		(€ thousands)			
Fixed interest rate	2,003,238	-	-	40,876	2,044,114
Variable interest rate	27,744	-	-	-	27,744
Total	**2,030,982**	**-**	**-**	**40,876**	**2,071,858**

PARENT COMPANY 31/12/2021	Available for sale	Trading	Held-to-maturity	Loans & receivables	TOTAL
		(€ thousands)			
Fixed interest rate	2,731,287	-	-	41,018	2,772,305
Total	**2,731,287**	**-**	**-**	**41,018**	**2,772,305**

The table above includes the analysis of the Group’s and the Parent Company's bond portfolio by type of interest rate (fixed or variable).

NOTE 30: INSURANCE PREMIUM AND OTHER RECEIVABLES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Insurance premium receivables	112,503	104,967	105,483	94,199
Provision for doubtful Insurance premium receivables	(58,652)	(59,391)	(58,043)	(58,618)
Insurance premium receivables	**53,851**	**45,576**	**47,440**	**35,581**
Staff mortgage loans	8,802	9,422	8,802	9,422
Loans to personnel - agents	3,463	4,200	3,463	4,200
Loans on life insurance contracts	1,247	1,459	1,247	1,459
Provision for doubtful loan receivables	(275)	(227)	(275)	(227)
Loans receivables	**13,237**	**14,854**	**13,237**	**14,854**
Sundry receivables	6,354	11,868	6,303	11,186
Accrued interest	19,872	28,264	19,867	28,032
Receivables from the Hellenic Republic under litigation	326	326	326	326
Claims receivables	7,624	8,679	7,624	8,679
Other income receivables	1,246	916	874	594
Amicable settlement claims	795	760	795	760
Provision for doubtful other receivables	(375)	(164)	(375)	(164)
Other receivables	**35,842**	**50,649**	**35,414**	**49,413**
Total insurance premium and other receivables	**102,930**	**111,079**	**96,091**	**99,848**

With respect to the loans receivables as described in the above table, the Company has signed collateral agreements which include real estate, financial and other collaterals.

Increase within line item "Insurance premium receivables" is mainly attributed to the growth of new business and rate increase in life insurance premium.

Decrease within line item "Accrued interest" relates to the decrease of the average yield of Bonds portfolio, after restructuring.

Decrease within line item "Sundry receivables" is due to the collection/settlement balances within 2022.

MOVEMENT OF PROVISION FOR DOUBTFUL RECEIVABLES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Provision for doubtful receivables at beginning of the period	**(59,782)**	**(62,232)**	**(59,009)**	**(61,399)**
Releases	911	2,720	747	2,660
Amounts written off during the period	60	42	-	-
Provision for the period	(491)	(312)	(431)	(270)
Provision for doubtful receivables at end of the period	**(59,302)**	**(59,782)**	**(58,693)**	**(59,009)**

NOTE 31: REINSURANCE RECEIVABLES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Receivables from reinsurers	77,265	94,202	70,355	76,063
Provision for doubtful receivables from reinsurers	(2,459)	(2,699)	(2,459)	(2,699)
Receivables from cedants	218	475	218	475
Total reinsurance receivables	**75,024**	**91,978**	**68,114**	**73,839**

MOVEMENT OF PROVISION FOR DOUBTFUL REINSURANCE RECEIVABLES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Provision for reinsurance receivables at beginning of the period	**(2,699)**	**(2,633)**	**(2,699)**	**(2,633)**
Releases	350	166	350	166
Provision for the period	(110)	(232)	(110)	(232)
Provision for reinsurance receivables at end of the period	**(2,459)**	**(2,699)**	**(2,459)**	**(2,699)**

NOTE 32: CASH AND CASH EQUIVALENTS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Cash in hand	101	201	4	4
Sight deposits	51,999	31,230	50,017	26,897
Time deposits with financial institutions	23,223	57,286	12,710	48,493
Total cash and cash equivalents	**75,323**	**88,717**	**62,731**	**75,394**

The carrying amount of cash and cash equivalents, approximates its fair value.

Cash and cash equivalents by type of interest rate is analyzed in the following table:

	31/12/2022				31/12/2021			
	Cash in hand	Sight deposits and repos	Time deposits with financial institutions	TOTAL	Cash in hand	Sight deposits and repos	Time deposits with financial institutions	TOTAL
	(€ thousands)				*(€ thousands)*			
GROUP								
Fixed interest rate	-	1,025	23,223	24,248	-	7,637	57,286	64,923
Non interest bearing	101	50,974	-	51,075	201	23,593	-	23,794
Total	**101**	**51,999**	**23,223**	**75,323**	**201**	**31,230**	**57,286**	**88,717**
PARENT COMPANY								
Fixed interest rate	-	1,025	12,710	13,735	-	7,039	48,493	55,532
Non interest bearing	4	48,992	-	48,996	4	19,858	-	19,862
Total	**4**	**50,017**	**12,710**	**62,731**	**4**	**26,897**	**48,493**	**75,394**

NOTE 33: SHARE CAPITAL

The share capital of the Parent Company as at 31 December 2022 amounts to €235,021 thousands, divided in 196,017,480 registered shares with a nominal value of €1.2 each. As at 31 December 2022, the Parent Company is a subsidiary of Ethniki Holdings S.à r.l., which holds 100% of the Company's share capital.

NOTE 34: RESERVES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Statutory reserve	26,100	26,207	26,862	26,862
Special reserves	2,027	2,027	2,027	2,027
Extraordinary reserves	3	1,205	3	1,205
Available-for-sale securities reserve	(289,201)	242,494	(288,260)	242,472
Reserve from non taxable income	342	1,678	342	1,678
Liabilities from defined benefit plans	(2,597)	(9,652)	(2,597)	(9,652)
Currency translation differences	(4,917)	(4,761)	-	-
Other reserves	1,914	1,963	-	49
Total reserves	**(266,329)**	**261,160**	**(261,623)**	**264,641**

MOVEMENT OF AVAILABLE-FOR-SALE RESERVE

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Balance at beginning of the period	**331,336**	**331,336**	**242,472**	**330,730**
Net gain/(loss) from changes in fair value	(486,194)	(72,390)	(485,231)	(71,807)
Net profit transferred to profit or loss	(43,750)	(25,397)	(43,750)	(25,397)
Impairment losses	2,957	1,340	2,957	1,340
Effect of tax rate change	(4,708)	7,606	(4,708)	7,606
Other movements	-	(1)	-	-
Balance at end of the period	**(289,201)**	**242,494**	**(288,260)**	**242,472**

Statutory reserve: This reserve is established 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 establishment 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 establishment of a statutory reserve. Therefore, the provisions of Greek Law 4548/2018 apply, for the establishment 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.

AFS reserve: This reserve, includes valuation of gains and losses on available for sale securities and is transferred to profit or loss upon sale or the portion relating to impairment losses of their fair value. Any realized gains or losses are taxed with the corporate income tax rate.

Extraordinary reserves: These reserves have been established in the past pursuant to a resolution of the Parent Company's General Meeting, comprise of special reserves from the merger of subsidiaries and can be distributed to the Parent 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 Parent Company's defined benefit plans. Changes in the reserve over the year are presented in Note 41.

Currency translation differences: This reserve relates to the cumulative currency translation adjustments resulting from the use of closing and average exchange rates and from revaluing our Romanian subsidiary’s opening net asset balance at closing. Cumulative translation adjustments are reclassified from OCI to net income upon disposal of our subsidiary.

NOTE 35: RETAINED EARNINGS

Retained earnings of the Parent Company as at 31 December 31 2022, include realized gains on the disposal of E.U. bonds, which in accordance with Ministerial Circular 1032/2015 are exempted from income tax, and according to article 47 par. 1 of the Greek Law 4172/2013, will be taxed upon their distribution or capitalization. The aformentioned gains for which taxation has been suspended, amount to €640 thousands.

Following the 175/ 25.11.2022 Extraordinary General Meeting, the Parent Company approved the distribution of a dividend of €91,689 thousand, deriving from other discretionary reserves (€1,251 thousand) and prior year profits (€90,438 thousand), in accordance with article 162, paragraph 3 of Law 4548/2018. The above distribution, to the sole shareholder of the Company "Ethniki Holdings S.à.r.l.", was completed within 2022.

NOTE 36: MATHEMATICAL RESERVES AND INSURANCE TECHNICAL RESERVES

GROUP	31/12/2022			31/12/2021		
	Group share	Reinsurers' share	Total	Group share	Reinsurers' share	Total
			(€ thousands)			
LIFE INSURANCE RESERVES						
Mathematical reserves, liability adequacy reserves and unearned premium reserve	636,786	9,306	646,092	627,768	11,136	638,904
Outstanding claims reserves	150,820	1,474	152,294	131,375	1,687	133,062
Total life insurance reserves	**787,606**	**10,780**	**798,386**	**759,143**	**12,823**	**771,966**
Unit-Linked reserves	290,567	-	290,567	247,366	25	247,391
Unit-Linked guarantee reserve	65,283	-	65,283	64,993	-	64,993
Total Unit-Linked reserves	**355,850**	**-**	**355,850**	**312,359**	**25**	**312,384**
Total Life reserves	**1,143,456**	**10,780**	**1,154,236**	**1,071,502**	**12,848**	**1,084,350**
NON-LIFE INSURANCE RESERVES						
Unearned premium reserve	51,618	19,829	71,447	50,268	20,465	70,733
Outstanding claims reserves	273,773	50,608	324,381	284,584	62,601	347,185
Total non-life insurance reserves	**325,391**	**70,437**	**395,828**	**334,852**	**83,066**	**417,918**
Total reserves	**1,468,847**	**81,217**	**1,550,064**	**1,406,354**	**95,914**	**1,502,268**

PARENT COMPANY	31/12/2022			31/12/2021		
	Group share	Reinsurers' share	Total	Group share	Reinsurers' share	Total
			(€ thousands)			
LIFE INSURANCE RESERVES						
Mathematical reserves, liability adequacy reserves and unearned premium reserve	622,177	4,729	626,906	578,368	4,104	582,472
Outstanding claims reserves	149,836	1,474	151,310	130,830	1,687	132,517
Total life insurance reserves	**772,013**	**6,203**	**778,216**	**709,198**	**5,791**	**714,989**
Unit-Linked reserves	258,075	-	258,075	246,948	-	246,948
Unit-Linked guarantee reserve	65,283	-	65,283	64,993	-	64,993
Total Unit-Linked reserves	**323,358**	**-**	**323,358**	**311,941**	**-**	**311,941**
Total Life reserves	**1,095,371**	**6,203**	**1,101,574**	**1,021,139**	**5,791**	**1,026,930**
NON-LIFE INSURANCE RESERVES						
Unearned premium reserve	43,255	19,359	62,614	39,975	17,587	57,562
Outstanding claims reserves	265,347	49,235	314,582	275,222	57,228	332,450
Total non-life insurance reserves	**308,602**	**68,594**	**377,196**	**315,197**	**74,815**	**390,012**
Total reserves	**1,403,973**	**74,797**	**1,478,770**	**1,336,336**	**80,606**	**1,416,942**

MOVEMENT OF INSURANCE RESERVES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Movement of Life insurance reserves				
Life insurance reserves at beginning of the period	**1,084,350**	**1,074,948**	**1,026,930**	**1,020,001**
Additional liabilities and changes for the year	148,879	78,135	147,214	71,325
Reserve release on death, maturity, surrender, lapse etc.	(78,992)	(68,720)	(72,570)	(64,396)
Foreign exchange differences	-	(13)	-	-
Life insurance reserves at end of the period	**1,154,236**	**1,084,350**	**1,101,574**	**1,026,930**
Movement of Non-Life Insurance reserves				
Non-life insurance reserves at beginning of the period	**417,918**	**413,828**	**390,012**	**386,441**
Movement of Unearned Premium Reserve	5,174	2,759	4,613	2,056
Movement of Unexpired Risk Reserve	497	499	440	323
Non-life reserve of current year	73,611	60,863	64,300	51,664
Change in non-life reserves of prior years	(26,504)	(11,639)	(27,613)	(14,946)
Non-life claims paid of current year	(22,720)	(20,746)	(17,453)	(12,656)
Non-life claims paid of prior years	(40,489)	(31,732)	(35,208)	(27,041)
Foreign exchange differences	-	(82)	-	-
Other movements	(11,659)	4,168	(1,895)	4,171
Non-life insurance reserves at end of the period	**395,828**	**417,918**	**377,196**	**390,012**
Total	**1,550,064**	**1,502,268**	**1,478,770**	**1,416,942**

NOTE 37: INVESTMENT CONTRACT LIABILITIES

GROUP & PARENT COMPANY	31/12/2022	31/12/2021
	(€ thousands)	
Group investment contracts		
Balance at beginning of the period	**195,996**	**187,612**
Contributions	41,578	36,337
Withdrawals	(19,073)	(27,810)
Interest	2,012	2,312
Other movements	(2,565)	(2,455)
Balance at end of the period	**217,948**	**195,996**
Investment contracts to individuals		
Balance at beginning of the period	**1,159,666**	**1,089,055**
Reserve release	(49,581)	(39,281)
New policies	-	59,873
Change in reserve	13,186	50,053
Other movements	1,171	(34)
Balance at end of the period	**1,124,442**	**1,159,666**
Total investment contract liabilities	**1,342,390**	**1,355,662**

Within line "Investment contracts to individuals" endowment contracts with premium return in case of death of amount €799,274 thousands (2021: €829,479 thousands) and Unit-Linked contracts of amount €325,168 thousands (2021: €330,187 thousands), are included.

NOTE 38: OTHER LIABILITIES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Amounts due to brokers and agents	23,973	22,295	22,609	20,413
Payable expenses and deferred income	8,975	12,204	8,975	8,716
Creditors and suppliers	17,852	10,361	16,525	8,936
Taxes and duties	19,710	16,459	19,710	16,445
Amounts collected on behalf of third parties	183	197	183	197
Amounts due to social security organizations	1,480	1,803	1,480	1,803
Provision for third party claims against the Company	1,583	1,176	1,583	1,176
Provision for accrued expenses	4,965	5,729	4,965	5,729
Other liabilities	8,728	7,513	8,147	6,547
Total other liabilities	**87,449**	**77,737**	**84,177**	**69,962**

Group companies are involved (as defendant and plaintiff) in various judicial and arbitration procedures, in the ordinary course of business. The Management and legal advisors of the Parent Company consider that all pending litigations will be settled without a significant adverse impact on the Group's financial position or operating results. The Parent Company has formed a provision for all the litigations that considers it is more likely than not, to incur a loss.

Increase within line "Creditors and suppliers" is mainly attributed to outstanding balance to suppliers for rendering of services relating to the digitalization and operational transformation of the Parent Company.

The adoption of IFRS 16 on 1 January 2019, resulted in an increase of the Group's and the Parent Company's assets and liabilities. The effect in the Group's and Parent Company's liabilities is presented within line "Other liabilities" and as at 31 December 2022 amounted to €1,557 thousands (2021: €1,498 thousands) for the Group and to €1,218 thousands (2021: €965 thousands) for the Parent Company as at 31st December 2021 (see Note 2.17).

Within line "Accrued expenses and deferred income", amount of € 6,120 thousands relates to the deferred income for the transaction of property "Plot of Elliniko - 35th Street" (see Note 20).

NOTE 39: FINANCIAL LIABILITIES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Short-term borrowings	2,166	2,153	2,166	2,153
Long-term borrowings	175,000	175,000	175,000	175,000
Total borrowed funds	**177,166**	**177,153**	**177,166**	**177,153**

The Parent Company has issued a subordinated loan of indefinite duration of €50,000 thousands, out of which €45,000 thousands is held by NBG and €5,000 thousands is held by NBG Bank Malta, (a subsidiary of NBG). 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 Solvency II.

Additionally the Parent Company has issued a 10-year duration subordinated loan of €125,000 thousands, which is entirely held by NBG. The loan has a fixed rate of interest during its whole term, set at 650 basis points (6.50%). The loan meets the criteria for classification under Equity Category 2, in accordance with the provisions of Solvency II.

NOTE 40: REINSURANCE LIABILITIES

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Amounts payable to reinsurers	19,161	23,970	19,888	23,551
Amounts payable to cedants	871	890	871	890
Total reinsurance liabilities	**20,032**	**24,860**	**20,759**	**24,441**

NOTE 41: EMPLOYEE BENEFIT OBLIGATIONS

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)			
Defined benefit plans of the Parent Company	26,832	53,441	26,832	53,441
Retirement Indemnities	4,000	25,496	4,000	25,496
Subtotal	**30,832**	**78,937**	**30,832**	**78,937**
Defined contribution plans of the Parent Company	18,298	19,267	18,298	19,267
Total employee benefits	**49,130**	**98,204**	**49,130**	**98,204**

According to the terms of DAF contracts No. 2361, 2740 and 3002 issued by the Parent Company, each employee is entitled to receive upon retirement a lump sum benefit, unless retirement is due to partial or total disability caused by accident or illness and the employee has received or shall receive in the future a relevant disability benefit on the basis of a group contract also issued by the Parent Company. These contracts provide protection against permanent total disability due to illness, death and permanent total or partial disability due to accident.

The staff of the Group companies in Greece receives a retirement indemnity in accordance with the prevailing legislation.

	GROUP & PARENT COMPANY 31/12/2022	31/12/2021
	(€ thousands)	
Reconciliation of present value of obligation		
Present value of obligations at beginning of period	78,937	54,341
Service cost	1,159	1,527
Interest cost	364	256
Employee contributions	390	498
DAF benefits	(25,620)	(41)
Indemnities paid by the Company	(17,214)	(106)
Increase due to termination of contracts with consensual processes and other	1,862	21,236
(Gain)/ Loss due to financial assumptions	(6,610)	8
(Gain)/ Loss due to demographic assumptions	-	799
(Gain)/ Loss due to experience adjustments	(2,435)	419
Present value of funded obligations at end of period	**30,833**	**78,937**
Reconciliation of amount recognized in other comprehensive income		
Amount recognized in comprehensive income at beginning of period	**(12,375)**	**(11,149)**
Gain/ (Loss) due to changes in assumptions	6,610	(807)
Gain/ (Loss) due to experience adjustments	2,435	(419)
Total amount recognized in other comprehensive income during the period	**9,045**	**(1,226)**
Amount recognized in other comprehensive income at end of period	**(3,330)**	**(12,375)**
Key assumptions		
Discount rate	3,63%	0,50%
Price inflation	2,20%	2,00%
Plan duration (years)	8,03	8,42

The table below set outs the sensitivity analysis to the present value of the accumulated liability, in a change of the basic valuation assumptions.

PARENT COMPANY Sensitivity analysis of actuarial assumptions			
		Law 4093	DAF
Discount rate	Increase by 50 bps	-3%	-4%
	Decrease by 50 bps	3%	4%
Rate of compensation increase	Increase by 50 bps	2%	3%
	Decrease by 50 bps	-2%	-3%

Employer contributions to the defined benefit contracts 2361 and 2740 for 2023 are estimated at €800 thousands.

NOTE 42: RELATED PARTY DISCLOSURES

	GROUP							
	31/12/2022				31/12/2021			
	Assets	Liabilities	Income	Expenses	Assets	Liabilities	Income	Expenses
	(€ thousands)				(€ thousands)			
Transactions with related parties until 31.03.2022								
- Time&Sight deposits	29,685	-	3	-	27,541	-	15	-
- Insurance services	327,135	5,082	1,755	3,044	327,705	5,622	6,409	14,544
- Other transactions	1,157	176,712	26	3,051	1,514	178,837	157	6,737
Transactions with related parties until 01.04.2022								
- Insurance services	3	-	767	7	-	-	-	-
Total	**357,980**	**181,794**	**2,551**	**6,102**	**356,760**	**184,459**	**6,581**	**21,281**

	PARENT COMPANY							
	31/12/2022				31/12/2021			
	Assets	Liabilities	Income	Expenses	Assets	Liabilities	Income	Expenses
	(€ thousands)				(€ thousands)			
Ethniki Insurance Group Companies	2	198	25	17	2	211	46	44
Transactions with related parties until 31.03.2022								
- Time&Sight deposits	26,710	-	3	-	24,593	-	15	-
- Insurance services	327,052	4,983	1,674	3,029	327,730	5,615	6,162	14,475
- Other transactions	1,157	176,712	32	3,051	1,514	178,837	178	6,737
Transactions with related parties until 01.04.2022								
- Insurance services	3	-	767	7	-	-	-	-
Total	**354,924**	**181,893**	**2,501**	**6,104**	**353,839**	**184,663**	**6,401**	**21,256**

a. Transactions with related parties:

All transactions with related parties were conducted in the normal course of business, and with the same terms with those provided to third parties.

Within line "Other transactions" is included (i) the subordinated bond loan of €50 million that the Parent Company has issued and is held by NBG and NBG Bank Malta, a 100% subsidiary of NBG, and (ii) the subordinated bond loan of €125 million that the Parent Company has issued and is held entirely by NBG (see Note 39).

The Parent Company has capitalized within 2022 a total of €762 thousands (2021: €912 thousands) relating to transactions with NBG.

The Parent Company manages DAF contracts for employees of NBG Group amounting to €62,277 thousands (2021: €79,620 thousands), out of which €57,397 thousands relate to employees of the Parent Company (2021: €75,023 thousands).

b. Transactions with Key Management Personnel (KMP):

All transactions with the related parties were conducted in the normal course of business, and with the same terms with those provided to third parties or those agreed in employment contracts.

The Group and the Parent company, in the ordinary course of business, have entered into transactions with the members of the Board of Directors, the General Managers and the Deputy General Managers, as well as with their close relatives or entities controlled or jointly controlled by those persons. The list of the members of the Board of Directors of the Parent Company is presented under Note 1 "General Information".

Specifically, as at 31st December 2022, receivables and liabilities amounted to €2 thousands and €559 thousands respectively (2021: €4 thousands and €464 thousands), while in 2022 premiums and claims amounted to €36 thousands and €130 thousands respectively (2021: €30 thousands and €75 thousands).

Total compensation in 2022 amounted to €4,499 thousands (2021: €1,847 thousands), including short-term benefits of €3,183 thousands (2021: €1,815 thousands), post-retirement benefits of €47 thousands (2021: €32 thousands) and termination indemnity €1,240 thousands.

Provision for compensation in case of retirement amounted to €29 thousands (2021: €114 thousands).

The Parent Company and the Group have not provided or received any guarantees or commitments of any kind concerning related parties.

As at 31 December 2022 and 31 December 2021, neither the Parent Company nor the Group have recognized any provision for non-performing receivables, relating to amounts due from related parties, as related credit risk is considered limited.

NOTE 43: CONTINGENT LIABILITIES

Legal proceedings

Group companies are involved (as defendant and plaintiff) in various judicial and arbitration procedures, in the ordinary course of business. The Management and legal advisors of the Parent Company consider that all pending litigation will be settled without significant adverse impact on the Group's financial position or operating results.

Guarantees

As at 31 December 2022, the Parent Company had issued guarantees of good performance amounting to €2,458 thousands (2021: €1,998 thousands), which mainly relate to participation in tenders for undertaking new insurance business.

Pending tax audits

Tax authorities have not yet audited all subsidiaries for certain financial years, hence tax obligation for these years may not be considered as final. Additional taxes and penalties may be imposed as a result of such tax audits; although the amount cannot be determined, it is not expected to have a material impact on the financial position of the Company and the Group.

Fiscal years from 2011 to 2016 have been tax audited by Deloitte Certified Public Accountants S.A. in accordance with article 82 of law 2238/1994 subsequently with article 65a of law 4174/2013, and the tax certificates, which were unqualified, were issued on 27 July 2012, 24 September 2013, 09 July 2014, 29 September 2015, 30 September 2016 and 26 October 2017 respectively.

Fiscal years from 2017 to 2021 have been tax audited by PricewaterhouseCoopers S.A. and the tax certificates, which were unqualified, were issued on 31 October 2018, 29 October 2019, 23 October 2020, 22 October 2021 and 26 October 2022 respectively.

Fiscal year 2022 will be also tax audited by PricewaterhouseCoopers S.A. and no additional tax liabilities are expected that could significantly affect the financial position of the Company.

On 31 December 2022, the right of the tax authorities to issue a deed for re-calculation of income tax for the years up to and including year 2016, expired. In accordance with Ministerial Circular 1006/2016, there is no exception from tax audit performed by the tax authorities to those entities that have been tax audited by the independent auditor and its tax audit certificate was unqualified.

Therefore the tax authorities may re-audit the tax books, however, it is expected that the financial impact of such future audits will not affect significantly the financial position of the Company and the Group.

Additional information regarding the unaudited tax years of the Parent company and its subsidiaries can be found in Note 18.

NOTE 44: POST BALANCE SHEET EVENTS

Voluntary Exit Scheme (VES) Program

The Board of Directors of the Company, in its meeting on 4 April 2023, approved a Voluntary Exit Scheme for the employees and salaried lawyers of the Company. The deadline for submitting applications for participation in the VES was 5 May 2023, with an estimated cost of €5,200 thousands.

Taking into consideration the timing of the event and given that the deadline for submitting applications for participation in the VES is 5 May 2023, the Group has assessed the event as non-adjusting.

Exposure to the International Banking Sector

The Company has zero direct exposure to SVB or Credit Suisse instruments either through money market, bonds or equity financial instruments and continues to monitor the impact from further banking stresses on the sector and on the wider economy as well.

Total banking sector exposure as a percentage of the total portfolio remains small. While the Company maintains some global banking exposure, this is allocated to large systemic banks, which have high liquidity ratios and are well capitalized, reducing the risk of any adverse impacts.

NOTE 45: AUDIT FEES

Price Waterhouse Coopers S.A. ("PwC") was appointed as the principal independent statutory auditor for the years ended 31 December 2022 and 31 December 2021. The following table presents the aggregate fees for audit services and other professional services rendered by the Group's principal independent auditor PwC, which is a member firm of PwC Network, other member firms of the Network and their respective affiliates.

	GROUP		PARENT COMPANY	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
	(€ thousands)		*(€ thousands)*	
Audit of statutory financial statements	313	280	195	190
Audit-related services	373	339	331	282
Other non audit services	-	180	-	180
Total independent auditor's fees	**686**	**799**	**526**	**652**

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