

**EXECUTIVE COMMITTEE ACT No. 42/30.5.2014**

Re: Supervisory framework for the management of loans in arrears and non-performing loans

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**THE EXECUTIVE COMMITTEE OF THE BANK OF GREECE**

Having regard to:

- (a) Article 55A of the Statute of the Bank of Greece, as currently in force;
- (b) the provisions of Law 4261/2014 “Access to the activity of credit institutions and prudential supervision of credit institutions and investment firms (transposition of Directive 2013/36/EU), repeal of Law 3601/2007, and other provisions” (Government Gazette A 107), as currently in force, in particular Articles 4, 65, 66, 68, 80, 89 and 103 thereof;
- (c) Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No. 648/2012, OJ L 176 (27.6.2013) 1;
- (d) the provisions of Law 4224/2013 “Government Council for Private Debt Management, Institution for Growth in Greece, provisions on the Hellenic Republic Asset Development Fund, and other emergency provisions” (Government Gazette A288), in particular Article 1(2) thereof;
- (e) Bank of Greece Governor’s Act 2577/9.3.2006 “Framework of operational principles and criteria for the evaluation of the organisation of Internal Control Systems of credit and financial institutions and relevant powers of their management bodies” (Government Gazette A59), as currently in force;
- (f) the Opinion of the European Banking Authority on Good Practices for Responsible Mortgage Lending (EBA-OP-2013-02);
- (g) EBA Final Draft Implementing Technical Standards on supervisory reporting on forbearance and non-performing exposures under Article 99(4) of Regulation (EU) No. 575/2013 (EBA/ITS/2013/03 of 21 October 2013); and
- (h) the fact that no expenditure shall be incurred by the Government Budget as a result of the provisions of this Act,

**HEREBY DECIDES AS FOLLOWS**

## **I. General**

1. To lay down a special framework of requirements for credit institutions' management of loans in arrears and non-performing loans (NPLs), over and above the already applicable requirements of Law 4261/2014, Regulation (EU) No. 575/2013 and the Bank of Greece decisions issued by authority thereof. This framework imposes the following main obligations on credit institutions:

- (a) to establish an independent arrears and NPLs management (ANPLM) function;
- (b) to develop a separate, documented ANPLM strategy, the implementation of which will be supported by appropriate Management Information Systems (MIS) and procedures; and
- (c) to establish regular reporting to the management of the credit institution and the Bank of Greece.

The above requirements are specified in the following chapters of this Act.

## **II. Scope**

2. The provisions of this Act shall apply to:

- (a) all credit institutions authorised by the Bank of Greece, on a solo and a consolidated basis; and
- (b) branches in Greece of credit institutions based in non-EEA countries.

3. The provisions of this Act shall be without prejudice to the Bankruptcy Code (Law 3588/2007, Government Gazette A153) and Law 3869/2010 (Forbearance of overindebted natural persons' debt and other provisions, Government Gazette A130).

## **III. Management Strategy and Procedures**

4. Every credit institution shall develop and implement, through appropriate procedures, an arrears and NPLs management strategy (ANPLMS), which shall, as a minimum:

- (a) be concrete and clearly defined, distinguishing, as a minimum, between the following cases:
  - Loans in pre-arrears
  - Loans in early arrears (1-89 days past due)

- Non-performing loans
  - Denounced loans, comprising at least NPLs to non-cooperative or non-viable debtors;
- (b) adopt the best practices and guidelines of supervisory authorities;
- (c) include a description of suitable ANPLMS governance structures, as well as the internal control systems needed for its implementation;
- (d) provide for risk-based ANPLM, with appropriate allocation of available resources;
- (e) (5) include a satisfactory number of alternative forbearance and resolution and closure measures/frameworks, with a view to assessing debtors on a case-by-case basis according to the Code of Conduct referred to in Article 1(2) of Law 4224/2013;
- (f) include a specific policy framework of the credit institution regarding the planning and approval of the methodology for assessing the viability of debtors and every available modification by loan and debtor category;
- (g) include quantified targets for the systematic measurement of the effectiveness and efficiency of ANPLM, by loan portfolio category and delinquency bucket, as well as a methodology for monitoring performance against targets, with a view to taking proper corrective measures in a timely manner;
- (h) provide for the conduct of scenario/sensitivity analysis and scenarios of possible portfolio developments (including sub-portfolios and cohorts);
- (i) provide for the conduct of pilot management programmes (“pilots”) in properly targeted sub-portfolios and cohorts, and measure and assess results efficiently on the pilot population;
- (j) be supported by efficient MIS that ensure at least:
- (aa) the production of all the required internal reports, including the appropriate level of information;
  - (bb) the production of all the required regular and extraordinary supervisory reports;
  - (cc) the ability to conduct the required loan book analysis to enable segmentation and the assessment of performance and results;

- (dd) that an early warning system is embedded, allowing the pre-emption of potentially troubled exposures/loans based on predefined early warning indicators;
  - (ee) systematic recording and easy retrieval of all the data used in the initial assessment of borrowers or subsequent regular assessments of debtors with forborne loans;
  - (ff) the standardisation of the presentation of such information;
- (k) provide for the establishment of early warning mechanisms and systems;
- (l) ensure the use of a reliable system for compiling, processing, validating, updating, retaining and retrieving the required data, with clear specifications and accessibility criteria, in relation to the overall information on loans that fall within the scope of this Act (economic data, documentation, legal and other documents, including maintaining communication data with borrowers), subject to the legislation on personal data protection, in particular Law 2472/1997 (Government Gazette A50);
- (m) provide the staff involved with clear guidelines on the management of non-cooperative or non-viable debtors, including training policies;
- (n) be subject to regular review in order to adapt to macroeconomic conditions and delinquency and NPL trends and flows. The review shall take into account possible changes in internal factors (e.g. strategy changes, structural changes, portfolio developments, possible acquisitions, mergers or sales of portfolio segments) and external factors (e.g. overall market conditions, macroeconomic environment, developments in the amount of NPLs at system level); and
- (o) be clearly communicated to the employees and other management officers/bodies involved in the ANPLMS and its implementation.

#### **IV. Corporate Governance Bodies Responsible for ANPLM**

5. Credit institutions shall establish a separate ANPLM function, as well as an independent, well-staffed body responsible for the centralised monitoring of this function and for the overall effective implementation of the ANPLMS.

6. Credit institutions shall clearly define the blueprint and the number and qualifications of the staff responsible for implementing and monitoring the ANPLMS. Specifically, the management body responsible for monitoring loans in arrears and

NPLs (hereinafter referred to as “Arrears and NPLs Monitoring Body”, “ANPLMB”) shall:

- (a) process, on a centralised basis, all the internal reports on the ANPLM function under this Act;
- (b) develop the available forbearance and resolution and closure measures by loan sub-portfolio and monitor their performance on the basis of appropriate Key Performance Indicators (KPIs);
- (c) define criteria to assess the sustainability of proposed forbearance or resolution and closure measures, and design decision trees;
- (d) determine the parameters and scope of authority of the bodies and officers involved in the assessment of the viability and sustainability of the proposed modifications and the subsequent monitoring of their implementation; and
- (e) design, monitor and assess pilots (possibly in cooperation with other business units).

7. In order to ensure an objective and impartial approach to ANPLM and the application of modifications to distressed debtors, credit institutions shall ensure that the ANPLM function and the ANPLMB enjoy an appropriate degree of independence from their other functions, in particular the lending and management of performing loans functions. This function shall be clearly defined, separate and subject to control and monitoring by the internal audit function of the credit institution.

The ANPLMB recommendations and reports on the efficiency of the ANPLMS, the available forbearance and resolution and closure measures, the results of pilots, the criteria for assessing the viability of forbearance or resolution and closure measures, as well as the organisational arrangements referred to in para. 11(d), shall be submitted to the board of directors, a member of which shall be specifically entrusted with closely monitoring the ANPLMS. The reports on the efficiency of the ANPLMS and the available forbearance or resolution and closure measures shall be submitted to the board of directors on a quarterly basis.

The ANPLMB shall cooperate with the Risk Management Unit to reach a mutual understanding and develop an appropriate methodology for the evaluation of the risks inherent in every type of modification and delinquency bucket, by portfolio. The ANPLMB recommendations and reports to the board of directors shall also be submitted to the Risk Management Unit, whose head shall express his/her opinion on

these recommendations to the board of directors, through the Risk Management Committee.

8. The above requirements shall be without prejudice to the general principles and requirements on corporate governance of the legislation in force, including Regulation (EU) No. 575/2013 and the EBA guidelines, in particular with respect to the responsibilities and reporting lines of any committees that may assist the board of directors, as well as of the other management bodies of the credit institution. In deciding on the overall risk-taking strategy and credit policy, the total of risks that the credit institution takes or is likely to take in connection with both the performing loans portfolio and the portfolio subject to the ANPLMS shall be taken into account.

## **V. Portfolio Classification Guidelines**

9. Portfolio segmentation is a key part of any ANPLMS as it enables credit institutions to choose and tailor different management solutions in different segments of their loan books. To this end, credit institutions shall, as a minimum:

(a) segment each relevant portfolio and sub-portfolio, defining the portfolio segments based on consistent and clear segmentation criteria (e.g. purpose of loan, currency, interest rate, location of mortgaged property, location of corporate debtor, amount of exposure, debtor's delinquency behaviour, etc.), developing suitable methodologies;

(b) further segment each sub-portfolio into discrete cohorts on the basis of delinquency bucket and default risk, taking into account stress credit ratings and internal behavioural systems data, especially for the ANPLMS purposes.

10. The above arrangements aim at the management, on a priority basis, of loans in arrears and NPLs on the basis of the risk, cooperativeness and viability of each debtor.

## **VI. Guidelines on the Development and Assessment of Viable Modifications**

11. In the context of the ANPLMS, credit institutions shall develop and implement a suitable framework of alternative modifications for loans in arrears and NPLs with a view to offering to cooperative and viable debtors those modifications that are robust and sustainable, duly taking into account the causes of the debtor's financial difficulties. To this end, credit institutions shall:

- (a) define eligible modifications for each sub-portfolio, narrowed down to each cohort, and monitor the evolution of each sub-portfolio and cohort based on pre-defined KPIs;
- (b) assess, on the basis of conservative and credible assumptions, the economic impact of each forbearance and resolution and closure measure on the credit institution in comparison with other alternative measures, on the basis of NPV and the required provisions;
- (c) take into account the current legal framework, in particular insolvency law, Law 3869/2010 and their implementation parameters, making measurable estimates of the cost and expected time of resolution and closure;
- (d) define and document the criteria to be met, in the context of the implementation of this Act, in order for a modification to qualify as “appropriate”, in the sense of being sustainable;
- (e) develop concrete methodologies for assessing the debtor’s repayment capacity, taking into account historical and already available data and realistic estimates of future repayment capacity; and
- (f) develop and have in place documented methodologies for the valuation and re-valuation of collateral (if any).

12. Modifications shall not be used to conceal, whether temporarily or permanently, the real level of risk inherent in modified loans, which shall be fully recognised in a timely fashion by credit institutions. The viability of a modification shall be assessed on the basis of conservative and credible estimates of the current and future repayment capacity of the debtor until the end of the new repayment schedule.

13. An indicative list of modifications that may be included in the ANPLMS toolkit of credit institutions is given in Annex I “Modification Types”. Because credit institutions may face more complex and demanding cases of NPLs, in particular corporate loans, they may also need to use solutions combining the characteristics of two or more of the modifications listed in the Annex. In such case, for the sake of consistence as to the accuracy of the information reported to the Bank of Greece under Annex II to this Act, credit institutions shall assign to a composite solution the highest impact grade of a component modification. Modifications chosen under provisions of mandatory law shall be submitted separately.

## **VII. Guidelines on the Assessment of the Performance of Modifications**

14. Credit institutions shall use appropriate tools and processes to ensure maximum performance of the modifications recommended to debtors. These shall include:

- (a) regular credit reviews on reasonably-sized samples of portfolios or their sub-segments to assess the quality of case remedial management;
- (b) quality assurance exercises, such as regular review of compliance with the ANPLMS policies and processes on a reasonably-sized sample, including review of the suitability and sustainability of the proposed and agreed modifications;
- (c) introduction of and appropriate briefing on, by reporting/hierarchical level, the KPIs used to measure process efficiency and effectiveness;
- (d) automated monitoring of processes and KPIs through MIS;
- (e) implementation of manual reporting mechanisms for items which cannot be monitored automatically (e.g. legal actions, number of cases per settlement stage, auction participation rates etc.);
- (f) establishment of risk assessment criteria (e.g. key risk segments, high/medium-risk debtors, extent and frequency) and monitoring frequency by risk category;
- (g) indicators measuring, as a minimum:
  - the percentage of forbearance measures proposed to debtors;
  - the percentage of proposed forbearance measures that were accepted;
  - the loans that perform following the adoption of forbearance measures, as a percentage of total agreed forbearance measures by forbearance measure category, and the evolution of this percentage over time;
- (h) targeted analysis of broken promises and re-defaults to determine possible causes and appropriate remedies; and
- (i) determination of procedures for reclassification of a viable or cooperative debtor.

#### **VIII. Supervisory Assessment**

15. The Bank of Greece shall assess compliance with this Act, taking into account in particular the organisational and operational features of each credit institution, as well as the size and structure of its portfolio.



16. Where no solution is achieved that can be convincingly proved to be viable by the credit institution in line with this Act, resolution and closure solutions shall be considered effective from a supervisory point of view.

17. Generally, supervisory assessment of the ANPLM policy shall take into account the credit institution's provisioning policy, as well as the relevant information disclosed under Regulation (EU) No. 575/2013 and the Bank of Greece and Hellenic Capital Market Commission guidelines dated September 2013.

18. Supervisory assessment shall take into account the performance and efficiency targets set by credit institutions and any deviations from KPIs.

19. The Bank of Greece recommends that credit institutions enter into protocols on the management of borrowers with multiple creditors, adopting the best international practices.

20. In order to allow the Bank of Greece to monitor compliance with this Act, credit institutions shall submit to it:

- (a) the documented ANPLMS in place;
- (b) the reports of the ANPLMB to the board of directors, within five days from submission to the credit institution's management bodies;
- (c) the internal audit report on compliance with this Act, staff adequacy, independence and suitability of processes of the ANPLM function, within five days from submission to the credit institution's management bodies;
- (d) the Templates given in Annex II, by loan portfolio on a quarterly basis, within forty calendar days from the end of every calendar quarter;
- (e) on an extraordinary basis, upon the Bank of Greece's request, data and general information on the implementation of this Act and the achievement of its objects (e.g. number of modifications, re-default rates, number of performing modifications, methodologies for assessing the suitability of modifications, organisational changes and actions to upgrade systems, train staff etc.).

21. Gradual Implementation

This Act shall enter into force on 31 December 2014. By exception, the requirements to establish an ANPLMB and produce a documented ANPLMS shall be complied with by 30 June 2014. Systems shall be upgraded and all other operational arrangements (development of modifications and assessment methodologies etc.) shall be completed by 30 September 2014.

The supervisory reports referred to in para. 20(d) shall be submitted gradually, with a view to full compliance of credit institutions with the requirements of this Act by 31 December 2014, as follows:

(a) Submission of data with reference date 30 June 2014:

To be completed on a solo basis (at parent company level/Greek risk):

- Template 1a – EBA ITS\_New F 18.00 – Information on performing and non-performing exposures – Annex III (IFRS), Lines 70-170 of the Template (Loans and Advances), for credit institutions that apply the International Accounting Standards, or Template 1b – EBA ITS\_New F 18.00 – Information on performing and non-performing exposures – Annex IV (GAAP), Lines 70-170 of the Template (Loans and Advances), for credit institutions that apply the Greek Sectoral Accounting Plan of Banks.
- Template 2a – EBA ITS\_New F 19.00 – Information forborne exposures – Annex III (IFRS), Lines 70-170 of the Template (Loans and Advances), for credit institutions that apply the International Accounting Standards, or Template 2b – EBA ITS\_New F 19.00 – Information forborne exposures – Annex IV (GAAP), Lines 70-170 of the Template (Loans and Advances), for credit institutions that apply the Greek Sectoral Accounting Plan of Banks.
- Template 3 – Portfolio Segmentation, Lines 010-240 of the Template.
- Template 4 – Key Performance Statistics, 070-140 of the Template (Forborne Loans).
- Template 6 – Flows of Modifications, Line 260 of the Template.

(b) Submission of data with reference date 30 September 2014:

To be completed on a solo basis (at parent company level/Greek risk), together with the data in (a) above:

- Template 1a – EBA ITS\_New F 18.00 – Information on performing and non-performing exposures – Annex III (IFRS), Lines 340-550 of the Template (Off-Balance Sheet Exposures), for credit institutions that apply the International Accounting Standards, or Template 1b – EBA ITS\_New F 18.00 – Information on performing and non-performing exposures – Annex IV (GAAP), Lines 340-550 of the Template (Off-Balance Sheet Exposures), for credit institutions that apply the Greek Sectoral Accounting Plan of Banks.

- Template 2a – EBA ITS\_New F 19.00 – Information forborne exposures – Annex III (IFRS), Lines 010-060 and 190-340 of the Template (Debt Securities at Amortised Cost, Debt Instruments at Fair Value and Loan Commitments Given), for credit institutions that apply the International Accounting Standards, or Template 2b – EBA ITS\_New F 19.00 – Information forborne exposures – Annex IV (GAAP), Lines 010-060 and 190-340 of the Template (Debt Securities at Amortised Cost, Debt Instruments at Fair Value and Loan Commitments Given), for credit institutions that apply the Greek Sectoral Accounting Plan of Banks.
- Template 3 – Portfolio Segmentation, Lines 250-310 of the Template.
- Template 6 – Flows of Modifications, Lines 010-170 of the Template.
- Template 7 – Modifications Delinquencies.

(c) Submission of data with reference date 31 December 2014:

All the supervisory reports referred to in Annex II shall be completed on a solo and a consolidated basis, and full compliance with the provisions of this Act is required.

22. The Banking Supervision Department of the Bank of Greece is authorised to provide any clarifications and instructions needed for the implementation of this Act.

23. Specifically, to ensure compliance with the time schedule of para. 21 and the deadlines, the Banking Supervision Department of the Bank of Greece is authorised to provide instructions with a view to:

- (a) maximum harmonisation of the definitions on which supervisory reports rely, for reasons of comparability and matching of information;
- (b) maximum standardisation of the terminology and components of each type of modification, without precluding the development of more specific modifications, in particular for large corporations.

24. Pending the issuance of the relevant Regulation (EU) of the European Parliament and the Council adopting definitions applicable to this Act, the definitions given in EBA Final Draft Implementing Technical Standards on supervisory reporting on forbearance and non-performing exposures under Article 99(4) of Regulation (EU) No. 575/2013 (EBA/ITS/2013/03 of 21 October 2013) shall apply, as specified by the Bank of Greece.

25. Annexes I and II shall be an integral part of this Act.

26. This Act shall be published in the Government Gazette and posted on the Bank of Greece website.

## **ANNEX I – MODIFICATION TYPES**

27. This Annex lists indicatively the most widely used modifications of loan agreements aimed at facilitating a debtor in financial difficulties that is unable to fulfil the contractual terms. This is not meant to be an exhaustive list of all possible typical solutions, but rather an effort at minimum standardisation of the modifications widely used by credit institutions, for reasons of comparability and transparency and with a view to assisting the monitoring of their performance at credit institution and system level.

### **Section I. Short-term modifications**

28. Short-term modifications are defined as modifications with duration of less than five years. They are usually chosen where repayment difficulties are arguably considered as temporary. A new repayment schedule of the outstanding balance may be agreed, after the end of the short-term period, based on conservative assumptions about the future repayment capacity of the debtor until the end of the repayment schedule.

**(a) *Interest only***: During a defined short-term period, only interest is paid.

**(b) *Reduced payments***: The amount of repayment instalments is decreased over a defined short-term period (the new instalment amount may be higher or lower than that under the “interest only” solution).

**(c) *Grace Period***: The debtor is granted suspension of payments for a defined period.

**(d) *Skip payment(s)***: The debtor is contractually allowed to defer payment of a loan instalment.

**(e) *Arrears settlement***: Settlement of the amount in arrears, usually under an agreement to sell assets and maintain the claim on the outstanding principal.

**(f) *Arrears capitalisation***: Capitalisation of the amount in arrears and modification of the repayment schedule of the outstanding principal.

### **Section II. Long-term modifications**

29. Long-term modifications are defined as modifications with duration of five years and above. They include reduced instalments, possibly combined with an increase in the number of instalments and extension of the repayment period, always based on

conservative assumptions about the future repayment capacity of the debtor until the end of the repayment schedule.

**(a) Interest rate reduction:** Permanent reduction of the interest rate or interest rate margin.

**(b) Interest rate type change:** Change of interest rate type, from floating to fixed or vice versa.

**(c) Loan term extension:** Extension of the maturity of the loan (i.e. of the last contractual loan instalment date).

**(d) Split balance:** Where a credit institution agrees to split a debtor's unaffordable mortgage loan into two tranches:

(i) an affordable mortgage loan, which the debtor is expected to repay, on the basis of the existing and estimated future repayment capacity, and

(ii) a remaining balance, which is warehoused for repayment at a later date, through sale of assets or other arrangement agreed upon between the parties.

**(e) Partial debt forgiveness/Write-down:** This involves cancelling part of the debt outstanding, thus reducing it to an amount that is expected to be repaid smoothly.

**(f) Additional collateralisation:** It entails the mobilisation of additional collateral in the context of an overall, more favourable arrangement.

**(g) Operational restructuring:** Change of management of a corporate debtor, where the creditor bank(s) consider(s) that the company is conditionally viable but the current management does not cooperate. This option does not constitute in itself a type of modification for reporting purposes hereunder, but may be combined with other modifications.

**(h) Debt/equity swaps:** Typically occurs in corporate restructuring where part of the debt is converted into equity taken up by the credit institution, which thus becomes a shareholder, with the remaining debt right-sized to the projected cash flows of the debtor.

### **Section III – Resolution and closure**

30. Resolution includes any modification or termination of the contractual relationship between a credit institution and a debtor aimed at the resolution and closure of the credit institution's claim on the debtor, which may be combined with (voluntary or compulsory) surrender of the collateral to the credit institution in

repayment of part of the total claim, or sale of the collateral to cover the claim. Follows an indicative list of solutions used in international practice, the adoption of each one of which should be examined in the light of the provisions of Greek law:

**(a) Voluntary surrender:** A debtor unable to service his/her mortgage loan according to its existing terms and conditions voluntarily surrenders ownership of the mortgaged property to the credit institution (without a need for legal proceedings being initiated by the credit institution). The relevant agreement clearly specifies the settlement of the outstanding amount of the claim, if any.

**(b) Mortgage to Lease:** The debtor surrenders ownership of the real estate to the credit institution in exchange for a lease agreement, enabling him/her to rent and use the property for a minimum term (typically five years).

**(c) Mortgage to Rent:** The debtor surrenders ownership of the real estate to the credit institution or to a third party, while possibly reserving the right to use the property as residence for a minimum term (typically three years) by paying the relevant rent. The relevant agreement clearly specifies the settlement of the outstanding amount of the claim, if any.

**(d) Outright sale/Disposal/Discounted Pay-off:** Transfer of the loan to another institution, lender or financing scheme.

**(e) Trade down:** An arrangement that allows the distressed borrower with a mortgage on the principal residence or business premises to trade down to a lower value property.

**(f) Receivership:** Defined as the situation where the credit institution's claim is handled in the context of insolvency proceedings.

**(g) Collateral repossession/Liquidation:** Defined as the situation where the credit institution, having terminated the loan agreement and following appropriate legal proceedings, proceeds to the effective realisation of collateral to recover its claim.

**(h) Enforcement/Legal Action:** Defined as the resolution and closure situation where, in the absence or exhaustion of collateral, the credit institution initiates court proceedings against the debtor to recover any outstanding claims.

## Section IV – Impact Grades

31. Credit institutions shall assign to composite solutions the highest impact grade of a component modification as follows:

Impact grade	Modification Type	
1	<b>Short-term modifications</b>	Interest Only
2		Reduced payment
3		Grace period
4		Skip payment(s)
5		Arrears settlement
6		Arrears capitalisation
7	<b>Long-term modifications</b>	Interest rate reduction
8		Interest rate type change
9		Loan term extension
10		Split balance
11		Partial debt forgiveness/Write-down
12		Additional collateralisation
13		Operational restructuring
14		Debt/equity swap
15	<b>Resolution and closure</b>	Voluntary surrender
16		Mortgage to lease
17		Mortgage to rent
18		Outright Sale/Disposal/Discounted pay-off
19		Trade down
20		Receivership
21		Collateral repossession/Liquidation
22		Enforcement/Legal action





## ANNEX II – REPORTING FRAMEWORK

### Template 1a - EBA ITS New F 18.00 - Information on performing and non-performing exposures - Annex III (IFRS)

18. Information on performing and non-performing exposures

	References	Gross carrying amount											Accumulated impairment, accumulated changes in fair value due to credit risk and provisions							Collateral received and financial guarantees received			
		Performing					Non-performing						on performing exposures		on non-performing exposures					Collateral received on non-performing exposures		Financial guarantees received on non-performing exposures	
		010	020	030	040	050	060	070	080	090	100	110	120	130	140	150	160	170	180	190	200	210	
		Annex V, Part 2, 45, 109, 145-162	Annex V, Part 2, 145-162	Annex V, Part 2, 158	Annex V, Part 2, 158	Annex V, Part 2, 158	Annex V, Part 2, 145-162	Annex V, Part 2, 159	Annex V, Part 2, 159	Annex V, Part 2, 159	Annex V, Part 2, 159	Annex V, Part 2, 159	Annex V, Part 2, 46	Annex V, Part 2, 161	Annex V, Part 2, 161	Annex V, Part 2, 159,161	Annex V, Part 2, 159,161	Annex V, Part 2, 159,161	Annex V, Part 2, 159,161	Annex V, Part 2, 162	Annex V, Part 2, 162		
<b>010 Debt securities</b>	Annex V, Part 1, 24, 26																						
020 Central banks	Annex V, Part 1, 35(a)																						
030 General governments	Annex V, Part 1, 35(b)																						
040 Credit institutions	Annex V, Part 1, 35(c)																						
050 Other financial corporations	Annex V, Part 1, 35(d)																						
060 Non-financial corporations	Annex V, Part 1, 35(e)																						
<b>070 Loans and advances</b>	Annex V, Part 1, 24, 27																						
080 Central banks	Annex V, Part 1, 35(a)																						
090 General governments	Annex V, Part 1, 35(b)																						
100 Credit institutions	Annex V, Part 1, 35(c)																						
110 Other financial corporations	Annex V, Part 1, 35(d)																						
120 Non-financial corporations	Annex V, Part 1, 35(e)																						
130 Of which: Small and Medium-sized Enterprises	SME Art.1, 2(a)																						
140 Of which: Commercial real estate																							
150 Households	Annex V, Part 1, 35(f)																						
160 Of which: Residential mortgage loans																							
170 Of which: Credit for consumption																							
<b>180 DEBT INSTRUMENTS AT AMORTISED COST</b>	Annex V, Part 1, 13 (d)(e)																						
<b>190 Debt securities</b>	Annex V, Part 1, 24, 26																						
200 Central banks	Annex V, Part 1, 35(a)																						
210 General governments	Annex V, Part 1, 35(b)																						
220 Credit institutions	Annex V, Part 1, 35(c)																						
230 Other financial corporations	Annex V, Part 1, 35(d)																						
240 Non-financial corporations	Annex V, Part 1, 35(e)																						
<b>250 Loans and advances</b>	Annex V, Part 1, 24, 27																						
260 Central banks	Annex V, Part 1, 35(a)																						
270 General governments	Annex V, Part 1, 35(b)																						
280 Credit institutions	Annex V, Part 1, 35(c)																						
290 Other financial corporations	Annex V, Part 1, 35(d)																						
300 Non-financial corporations	Annex V, Part 1, 35(e)																						
310 Households	Annex V, Part 1, 35(f)																						
<b>320 DEBT INSTRUMENTS AT FAIR VALUE other than HFT</b>	Annex V, Part 1, 13 (b)(c)(d)(e)																						
<b>330 DEBT INSTRUMENTS other than HFT</b>	Annex V, Part 1, 13 (b)(c)(d)(e)																						
<b>340 Loan commitments given</b>	SFS 392; (1); (4); (7); (8); (9); BC 25; 'CRK ANNEX 1; Annex V, Part 2, 55																						
350 Central banks	Annex V, Part 1, 35(a)																						
360 General governments	Annex V, Part 1, 35(b)																						
370 Credit institutions	Annex V, Part 1, 35(c)																						
380 Other financial corporations	Annex V, Part 1, 35(d)																						
390 Non-financial corporations	Annex V, Part 1, 35(e)																						
400 Households	Annex V, Part 1, 35(f)																						
<b>410 Financial guarantees given</b>	SFS 393; 394; 395; BC 22; 21; 23; 24; 25; 'CRK ANNEX 1; Annex V, Part 2, 55																						
420 Central banks	Annex V, Part 1, 35(a)																						
430 General governments	Annex V, Part 1, 35(b)																						
440 Credit institutions	Annex V, Part 1, 35(c)																						
450 Other financial corporations	Annex V, Part 1, 35(d)																						
460 Non-financial corporations	Annex V, Part 1, 35(e)																						
470 Households	Annex V, Part 1, 35(f)																						
<b>480 Other Commitments given</b>	CR Annex 1; Annex V, Part 2, 56, 59																						
490 Central banks	Annex V, Part 1, 35(a)																						
500 General governments	Annex V, Part 1, 35(b)																						
510 Credit institutions	Annex V, Part 1, 35(c)																						
520 Other financial corporations	Annex V, Part 1, 35(d)																						
530 Non-financial corporations	Annex V, Part 1, 35(e)																						
540 Households	Annex V, Part 1, 35(f)																						
<b>550 OFF-BALANCE SHEET EXPOSURES</b>	Annex V, Part 2, 55																						

## Template 2a - EBA ITS New F 19.00 - Information forborne exposures - Annex III (IFRS)

### 19. Information forborne exposures

	References	Gross carrying amount of exposures with forbearance measures										Accumulated impairment, accumulated changes in fair value due to credit risk a					Collateral received and financial guarantees received					
		Performing exposures with forbearance measures					Non-performing exposures with forbearance measures					on performing exposures with forbearance measures	on non-performing exposures with forbearance measures			Collateral received on exposures with forbearance measures	Financial guarantees received on exposures with forbearance measures					
		010	020	Instruments with modifications in their terms and conditions	Refinancing	of which: Performing forborne exposures under probation	060	070	080	090	100		110	120	130			140	150	160	170	180
				030		040																
		Annex V. Part 2. 45, 109, 163-182	Annex V. Part 2. 145-162	Annex V. Part 2. 164 (a), 177, 178, 182	Annex V. Part 2. 164 (b), 177, 178, 181, 182	Annex V. Part 2. 176(b),177, 180	Annex V. Part 2. 145-162	Annex V. Part 2. 164 (a), 179-180,182	Annex V. Part 2. 164 (b), 179-182	CRR art 178; Annex V. Part 2.61	IAS 39-58-70	Annex V. Part 2. 172(a), 157	Annex V. Part 2. 46, 183	Annex V. Part 2. 145-183	Annex V. Part 2. 145-183	Annex V. Part 2. 164 (a), 179-180,182,183	Annex V. Part 2. 164 (b), 179-183	Annex V. Part 2. 162	Annex V. Part 2. 162			
010	<b>Debt securities</b>	Annex V. Part 1.24, 26																				
020	Central banks	Annex V. Part 1.35(a)																				
030	General governments	Annex V. Part 1.35(b)																				
040	Credit institutions	Annex V. Part 1.35(c)																				
050	Other financial corporations	Annex V. Part 1.35(d)																				
060	Non-financial corporations	Annex V. Part 1.35(e)																				
070	<b>Loans and advances</b>	Annex V. Part 1.24, 27																				
080	Central banks	Annex V. Part 1.35(a)																				
090	General governments	Annex V. Part 1.35(b)																				
100	Credit institutions	Annex V. Part 1.35(c)																				
110	Other financial corporations	Annex V. Part 1.35(d)																				
120	Non-financial corporations	Annex V. Part 1.35(e)																				
130	Of which: Small and Medium-sized Enterprises	SME Art 1 2(a)																				
140	Of which: Commercial real estate																					
150	Households	Annex V. Part 1.35(f)																				
160	Of which: Residential mortgage loans																					
170	Of which: Credit for consumption																					
180	<b>DEBT INSTRUMENTS AT AMORTISED COST</b>	Annex V. Part 1. 13 (d)(e)																				
190	<b>Debt securities</b>	Annex V. Part 1.24, 26																				
200	Central banks	Annex V. Part 1.35(a)																				
210	General governments	Annex V. Part 1.35(b)																				
220	Credit institutions	Annex V. Part 1.35(c)																				
230	Other financial corporations	Annex V. Part 1.35(d)																				
240	Non-financial corporations	Annex V. Part 1.35(e)																				
250	<b>Loans and advances</b>	Annex V. Part 1.24, 27																				
260	Central banks	Annex V. Part 1.35(a)																				
270	General governments	Annex V. Part 1.35(b)																				
280	Credit institutions	Annex V. Part 1.35(c)																				
290	Other financial corporations	Annex V. Part 1.35(d)																				
300	Non-financial corporations	Annex V. Part 1.35(e)																				
310	Households	Annex V. Part 1.35(f)																				
320	<b>DEBT INSTRUMENTS AT FAIR VALUE OTHER THAN HFT</b>	Annex V. Part 1. 13 (b)(c)																				
330	<b>DEBT INSTRUMENTS other than HFT</b>	Annex V. Part 1. 13 (b)(c)(d)(e)																				
340	Loan commitments given	IAS 39.2 (f), 4 (a) (c), 8C 13; IAS 39.2 (f), 4 (a) (c), 8C 13; IAS 39.2 (f), 4 (a) (c), 8C 13																				

# Template 1b - EBA ITS New F 18.00 - Information on performing and non-performing exposures - Annex IV (GAAP)

18. Information on performing and non-performing exposures

		References National GAAP compatible IFRS	Gross carrying amount												Accumulated impairment, accumulated changes in fair value due to credit risk and provisions							Collateral received and financial guarantees received	
			Performing					Non-performing							on performing exposures		on non-performing exposures					Collateral received on non-performing exposures	Financial guarantees received on non-performing exposures
			010	020	030	040	050	060	070	080	090	100	110	120	130	140	150	160	170	180	190		
																						Not past due or Past due <= 30 days	Past due > 30 days <= 60 days
		References National GAAP based on BAD	Annex V. Part 2, 45, 109, 145-162	Annex V. Part 2, 145-162	Annex V. Part 2, 158	Annex V. Part 2, 158	Annex V. Part 2, 158	Annex V. Part 2, 145-162	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159,161	Annex V. Part 2, 159,161	Annex V. Part 2, 159,161	Annex V. Part 2, 159,161	Annex V. Part 2, 162	Annex V. Part 2, 162	
		References National GAAP based on BAD	Annex V. Part 2, 45, 109, 145-162	Annex V. Part 2, 145-162	Annex V. Part 2, 158	Annex V. Part 2, 158	Annex V. Part 2, 145-162	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159	Annex V. Part 2, 159,161	Annex V. Part 2, 159,161	Annex V. Part 2, 159,161	Annex V. Part 2, 159,161	Annex V. Part 2, 162	Annex V. Part 2, 162	
010	Debt securities	Annex V. Part 1.24, 26																					
020	Central banks	Annex V. Part 1.35(a)																					
030	General governments	Annex V. Part 1.35(b)																					
040	Credit institutions	Annex V. Part 1.35(c)																					
050	Other financial corporations	Annex V. Part 1.35(d)																					
060	Non-financial corporations	Annex V. Part 1.35(e)																					
070	Loans and advances	Annex V. Part 1.24, 27																					
080	Central banks	Annex V. Part 1.35(a)																					
090	General governments	Annex V. Part 1.35(b)																					
100	Credit institutions	Annex V. Part 1.35(c)																					
110	Other financial corporations	Annex V. Part 1.35(d)																					
120	Non-financial corporations	Annex V. Part 1.35(e)																					
130	Of which: Residential mortgage loans	SME Art 1.2(a)																					
140	Of which: Commercial real estate	SME Art 1.2(a)																					
150	Households	Annex V. Part 1.35(f)																					
160	Of which: Residential mortgage loans																						
170	Of which: Credit for consumption																						
180	DEBT INSTRUMENTS AT AMORTISED COST	Annex V. Part 1.13 (d)(e); 14 (d)(e)																					
190	Debt securities	Annex V. Part 1.24, 26																					
200	Central banks	Annex V. Part 1.35(a)																					
210	General governments	Annex V. Part 1.35(b)																					
220	Credit institutions	Annex V. Part 1.35(c)																					
230	Other financial corporations	Annex V. Part 1.35(d)																					
240	Non-financial corporations	Annex V. Part 1.35(e)																					
250	Loans and advances	Annex V. Part 1.24, 27																					
260	Central banks	Annex V. Part 1.35(a)																					
270	General governments	Annex V. Part 1.35(b)																					
280	Credit institutions	Annex V. Part 1.35(c)																					
290	Other financial corporations	Annex V. Part 1.35(d)																					
300	Non-financial corporations	Annex V. Part 1.35(e)																					
310	Households	Annex V. Part 1.35(f)																					
320	other than HFT	Annex V. Part 1.13 (b)(c); 14 (b)(c)																					
330	DEBT INSTRUMENTS other than HFT	Annex V. Part 1.13 (b)(c)(d)(e); 14 (b)(c)(d)(e)																					
340	Loan commitments given	CRR Annex 1; Annex V. Part 2.56-57																					
350	Central banks	Annex V. Part 1.35(a)																					
360	General governments	Annex V. Part 1.35(b)																					
370	Credit institutions	Annex V. Part 1.35(c)																					
380	Other financial corporations	Annex V. Part 1.35(d)																					
390	Non-financial corporations	Annex V. Part 1.35(e)																					
400	Households	Annex V. Part 1.35(f)																					
410	Financial guarantees given	CRR Annex 1; Annex V. Part 2.56, 58																					
420	Central banks	Annex V. Part 1.35(a)																					
430	General governments	Annex V. Part 1.35(b)																					
440	Credit institutions	Annex V. Part 1.35(c)																					
450	Other financial corporations	Annex V. Part 1.35(d)																					
460	Non-financial corporations	Annex V. Part 1.35(e)																					
470	Households	Annex V. Part 1.35(f)																					
480	Other Commitments given	CRR Annex 1; Annex V. Part 2.56, 59																					
490	Central banks	Annex V. Part 1.35(a)																					
500	General governments	Annex V. Part 1.35(b)																					
510	Credit institutions	Annex V. Part 1.35(c)																					
520	Other financial corporations	Annex V. Part 1.35(d)																					
530	Non-financial corporations	Annex V. Part 1.35(e)																					
540	Households	Annex V. Part 1.35(f)																					
550	OFF-BALANCE SHEET EXPOSURES	Annex V. Part 2.55																					

## Template 2b - EBA ITS New F 19.00 - Information forborne exposures - Annex IV (GAAP)

### 19. Information forborne exposures

		References National GAAP compatible IFRS	Gross carrying amount of exposures with forbearance measures										Accumulated impairment, accumulated changes in fair value due to credit risk						Collateral received and financial guarantees received				
			Performing exposures with forbearance measures					Non-performing exposures with forbearance measures					on performing exposures with forbearance measures	on non-performing exposures with forbearance measures					Collateral received on exposures with forbearance measures	Financial guarantees received on exposures with forbearance measures			
			010	020	030	040	050	060	070	080	090	100		110	120	130	140	150			160	170	180
	References National GAAP based on BAD		Annex V, Part 2, 45, 109, 163-182	Annex V, Part 2, 145-162	Annex V, Part 2, 164 (a), 177, 178, 182	Annex V, Part 2, 164 (b), 177, 178, 181, 182	Annex V, Part 2, 176(b), 177, 180	Annex V, Part 2, 145-162	Annex V, Part 2, 164 (a), 179-180, 182	Annex V, Part 2, 164 (b), 179-182	CRR art 178; Annex V, Part 2.61	IAS 39, 58-70	Annex V, Part 2, 172(a), 157	Annex V, Part 2, 46, 183	Annex V, Part 2, 145-183	Annex V, Part 2, 145-183	Annex V, Part 2, 164 (a), 179-180, 182, 183	Annex V, Part 2, 164 (b), 179-183	Annex V, Part 2, 162	Annex V, Part 2, 162			
			Annex V, Part 2, 45, 109, 163-182	Annex V, Part 2, 145-162	Annex V, Part 2, 164 (a), 177, 178, 182	Annex V, Part 2, 164 (b), 177, 178, 181, 182	Annex V, Part 2, 176(b), 177, 180	Annex V, Part 2, 145-162	Annex V, Part 2, 164 (a), 179-180, 182	Annex V, Part 2, 164 (b), 179-182	CRR art 178; Annex V, Part 2.61	CRR art 4(95)	Annex V, Part 2, 172(a), 157	Annex V, Part 2, 46, 183	Annex V, Part 2, 145-183	Annex V, Part 2, 145-183	Annex V, Part 2, 164 (a), 179-180, 182, 183	Annex V, Part 2, 164 (b), 179-183	Annex V, Part 2, 162	Annex V, Part 2, 162			
010	Debt securities	Annex V, Part 1.24, 26	Annex V, Part 1.24, 26																				
020	Central banks	Annex V, Part 1.35(a)	Annex V, Part 1.35(a)																				
030	General governments	Annex V, Part 1.35(b)	Annex V, Part 1.35(b)																				
040	Credit institutions	Annex V, Part 1.35(c)	Annex V, Part 1.35(c)																				
050	Other financial corporations	Annex V, Part 1.35(d)	Annex V, Part 1.35(d)																				
060	Non-financial corporations	Annex V, Part 1.35(e)	Annex V, Part 1.35(e)																				
070	Loans and advances	Annex V, Part 1.24, 27	Annex V, Part 1.24, 27																				
080	Central banks	Annex V, Part 1.35(a)	Annex V, Part 1.35(a)																				
090	General governments	Annex V, Part 1.35(b)	Annex V, Part 1.35(b)																				
100	Credit institutions	Annex V, Part 1.35(c)	Annex V, Part 1.35(c)																				
110	Other financial corporations	Annex V, Part 1.35(d)	Annex V, Part 1.35(d)																				
120	Non-financial corporations	Annex V, Part 1.35(e)	Annex V, Part 1.35(e)																				
130	Of which: Small and Medium-sized Enterprises	SME Art 1 2(a)	SME Art 1 2(a)																				
140	Of which: Commercial real estate																						
150	Households	Annex V, Part 1.35(f)	Annex V, Part 1.35(f)																				
160	Of which: Residential mortgage loans																						
170	Of which: Credit for consumption																						
180	DEBT INSTRUMENTS AT AMORTISED COST	Annex V, Part 1.13 (d)(e); 14 (d)(e)	Annex V, Part 1.13 (d)(e)																				
190	Debt securities	Annex V, Part 1.24, 26	Annex V, Part 1.24, 26																				
200	Central banks	Annex V, Part 1.35(a)	Annex V, Part 1.35(a)																				
210	General governments	Annex V, Part 1.35(b)	Annex V, Part 1.35(b)																				
220	Credit institutions	Annex V, Part 1.35(c)	Annex V, Part 1.35(c)																				
230	Other financial corporations	Annex V, Part 1.35(d)	Annex V, Part 1.35(d)																				
240	Non-financial corporations	Annex V, Part 1.35(e)	Annex V, Part 1.35(e)																				
250	Loans and advances	Annex V, Part 1.24, 27	Annex V, Part 1.24, 27																				
260	Central banks	Annex V, Part 1.35(a)	Annex V, Part 1.35(a)																				
270	General governments	Annex V, Part 1.35(b)	Annex V, Part 1.35(b)																				
280	Credit institutions	Annex V, Part 1.35(c)	Annex V, Part 1.35(c)																				
290	Other financial corporations	Annex V, Part 1.35(d)	Annex V, Part 1.35(d)																				
300	Non-financial corporations	Annex V, Part 1.35(e)	Annex V, Part 1.35(e)																				
310	Households	Annex V, Part 1.35(f)	Annex V, Part 1.35(f)																				
320	DEBT INSTRUMENTS AT FAIR VALUE OTHER THAN HTF	Annex V, Part 1.13 (b)(c); 14 (b)(c)	Annex V, Part 1.13 (b)(c)																				
330	DEBT INSTRUMENTS other than HFT	Annex V, Part 1.13 (b)(c)(d)(e); 14 (b)(c)(d)(e)	Annex V, Part 1.13 (b)(c)(d)(e)																				
340	Loan commitments given	CRR Annex I; Annex V, Part 2.56-57	IAS 39.2 (h), 4 (a) (c), BC 15; CRR Annex 1; Annex V, Part 2.56-57																				

### Template 3 - Portfolio Segmentation

	010	020	030	040	050	060	070	080	090
Portfolio Segmentation	Τρέχων Τρίμηνο			Προηγούμενο Τρίμηνο			% Μεταβολής		
As of [DATE MONTH 20XX]	Balance (€bn)	Arrears <sup>(1)</sup> (€bn)	Loan Count	Balance (€bn)	Arrears (€bn)	Loan Count	Balance (€bn)	Arrears (€bn)	Loan Count
010 <b>A. Total Outstanding Portfolio</b>									
020 B. Current with no forbearance measures									
030 C. Arrears up to 90 dpd with no forbearance measures									
040 <b>D. Total Non Performing Exposures (E+F+G)</b>									
050 <b>E. Arrears below 90 dpd (current =&lt;90 dpd) with forbearance measures</b>									
060 Current									
070 In arrears up to 90 dpd ( 1<x<90dpd)									
080 1- 30 dpd									
090 31-60dpd									
100 61-90dpd									
110 <b>F. All loans in arrears above 90 dpd (excl. denounced) (independently of forbearance measures)</b>									
120 <i>Distribution by dpd bucket</i>									
130 91-180 dpd									
140 181-360 dpd									
150 361-720 dpd									
160 721+ dpd									
170 <i>Distribution by forbearance status</i>									
180 Forbearance Measures									
190 No Forbearance Measures									
200 <b>G. Denounced Loans</b>									
210 <i>Distribution by dpd bucket</i>									
220 Below 360 dpd									
230 361-720 dpd									
240 721+ dpd									
250 <i>Distribution by forbearance status pre transfer to Legal</i>									
260 Forbearance measures									
270 No Forbearance measures									
280 <i>Distribution by bankruptcy status</i>									
290 Under Personal Bankruptcy procedures <sup>(2)</sup>									
300 Under Corporate Bankruptcy procedures <sup>(3)</sup>									
310 Not Under Bankruptcy procedures									

Note (1): Arrears defined as amount due to the Banks

Note (2): For SBP and Residential mortgages portfolios only

Note (3): For Large Corporate, SME and SBP portfolios only

## Template 4 - Key Portfolio Performance Statistics

	010	020	030	040	050	060
Key Portfolio Statistics	Current Quarter		Previous Quarter		% Change	
As of [DATE MONTH 20XX]	Balance (€ bn)	Loan Count	Balance (€ bn)	Loan Count	Balance (€ bn)	Loan Count
<b>Cash Recoveries</b>						
010 Cash Recoveries						
020 Of which cash collections						
030 Of which collateral liquidations						
040 Of which other						
050 % Total cash yield <sup>(1)</sup> (based on total cash recoveries)						
060 % Total cash yield <sup>(2)</sup> (based on cash collections only)						
<b>Forborne Loans</b>						
070 Loans with forbearance measures during period						
080 Of which repeat modified during period <sup>(3)</sup>						
090 Of which first time modified during period						
100 Of which short-term modified during period						
110 Of which long-term modified during period						
120 Of which mandatory by Law modified during period						
130 Cure rate: Forborne loans moved to Performing status during period						
140 Forborne loans moved to Legal status during period						
<b>Tangible Collateral <sup>(4)</sup></b>						
150 Total tangible collateral						
160 Of which (residential real estate - own occupied)						
160 Of which (residential real estate - BTL)						
160 Of which (residential real estate - other)						
170 Of which (commercial real estate)						
180 Of which (other real estate)						
190 Of which (industrial/machinery/equipment)						
200 Of which (inventory)						
210 Of which (creditor held movable assets)						
220 Of which (debtor held movable assets)						
230 Of which (cash/financial securities)						
240 Of which (other collateral)						
250 Weighted average tangible collateral coverage ratio (%)						

Note (1): Total cash recoveries for the quarter divided by the average of the beginning of quarter and end of quarter NPE balance

Note (2): Total cash collections for the quarter divided by the average of the beginning of quarter and end of quarter NPE balance

Note (3): Loans undergone at least one modification since (tbd) , and which were remodified during the current period

Note (4): € balance represents corresponding collateral value

## Template 5 - Legal Workout

	010	020	030	040	050	060	070	080	090	100	110	120
Legal Work-out Activity of Denounced Loans	Current Quarter				Previous Quarter				% Change			
As of [DATE MONTH 20XX]	Balance (€bn)	Loan/ Collateral Count	Collateral Value (€bn)	Realised Value (€bn)	Balance (€bn)	Loan/ Collateral Count	Collateral Value (€bn)	Realised Value (€bn)	Balance (€bn)	Loan/ Collateral Count	Collateral Value (€bn)	Realised Value (€bn)
010 Total denounced loans end of period												
020 Loans fully liquidated during period												
030 Loans moved back to Remedial Management Unit during period												
040 Payment order issued												
050 Out-of-court settlements												
060 Collateral repossessed through auction process												
070 Collateral repossessed outside auction process												
080 Collateral in auction process (existing stock)												
090 Collateral entered auction process (during period)												
100 Collateral liquidated at auction												
110 Forced or voluntary pre-notations												
120 Other												
130 No action												

## Template 6 - Flows of Modifications

		010	020	030	040	050	060	070	080	090	100	110	120	130	140	150	160	170	180	190	200	210	220		
Flows of Troubled Assets		Beginning of Quarter		Inflows						Total Inflows		Outflows								Total Outflows		End of Quarter			
				From Performing		From previous modification		From arrears not modified				To Performing (Cured)		Remodified (re-defaulted)		To Denounced		Other (Resolution, etc)							
As of [DATE MONTH 20XX]		Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count	Balance (€bn)	Loan Count
<b>MODIFICATIONS (in arrears &amp; not in arrears, excl. denounced)</b>																									
<b>Short Term Modifications</b>																									
010	Interest Only																								
020	Reduced payment above IO																								
030	Reduced payment below IO																								
040	Temporary Grace Period																								
050	Skip Payment																								
060	Arrears Settlement																								
070	Arrears Capitalisation																								
080	L. 3869/2010																								
090	L. 4224/2013																								
100	Other mandatory by Law or Min. Decision																								
110	Other																								
<b>Long Term Modifications</b>																									
120	Permanent Rate Reduction																								
130	Loan Tenor Extension																								
140	Split Balance																								
150	Debt/Equity Swap																								
160	Partial Debt Forgiveness/ Write-offs																								
170	Other																								
<b>Closure Procedures</b>																									
180	Voluntary Surrender																								
190	Mortgage to Lease																								
200	Mortgage to Rent																								
210	Outright Sale/Disposal/Discounted Pay-off																								
220	Trade Down																								
230	Receivership																								
240	Collateral Repossession/Liquidation																								
250	Enforcement / Legal Action																								
<b>DENOUNCED</b>																									
260	<b>Total Denounced Loans</b>																								



# Template 7 - Modifications Delinquencies

Code	Description	Stock at the end of Quarter				Flows during the Quarter				Other	
		Balance (€M)	Arrears (€M)	Loan Count	Count	Balance (€M)	Arrears (€M)	Loan Count	Count	€M	Loan Count
010	As of DATE MONTH 20XX										
020	<b>MORTGAGES</b>										
030	Total residential mortgage loan accounts outstanding										
040	<b>ARREARS</b>										
050	Total mortgage loan accounts in arrears										
060	of which: up to 30 days										
070	in arrears 31 to 90 days										
080	in arrears 91 to 180 days										
090	in arrears 181 to 360 days										
100	in arrears 361 to 720 days										
110	Additions to/subtractions from total mortgage loan accounts in arrears										
120	in arrears over 90 days										
130	Cases in which a receiver has been appointed										
140	Arrears on properties not in the lender's possession										
150	Arrears on properties not in the lender's possession										
160	Mortgage debt written off										
170	Unsecured debt/shortfall accounts										
180	of which: Not in arrears										
190	in arrears over 90 days										
200	<b>REPOSSESSIONS</b>										
210	Residential properties in possession at beginning of quarter										
220	Residential properties in possession at end of quarter										
230	of which: number of residential properties in possession										
240	residential properties repossessed on lot of an order										
250	Residential properties voluntarily surrendered/abandoned										
260	Residential properties disposed of during this quarter										
270	Value realized from sale										
280	Amount written off as bad debt										
290	Amount remaining on which lender is seeking repayment										
300	<b>MODIFICATIONS</b>										
310	Total residential mortgages modified										
320	of which: Subtractions										
330	Interest Only										
340	of which: Not in arrears										
350	in arrears up to 90 days										
360	in arrears over 90 days										
370	Reduced payment above ID										
380	of which: Not in arrears										
390	in arrears up to 90 days										
400	in arrears over 90 days										
410	Reduced payment below ID										
420	of which: Not in arrears										
430	in arrears up to 90 days										
440	in arrears over 90 days										
450	Temporary Grace Period										
460	of which: Not in arrears										
470	in arrears up to 90 days										
480	in arrears over 90 days										
490	Stop Payment										
500	of which: Not in arrears										
510	in arrears up to 90 days										
520	in arrears over 90 days										
530	Arrears Settlement										
540	of which: Not in arrears										
550	in arrears up to 90 days										
560	in arrears over 90 days										
570	Arrears Capitalisation										
580	of which: Not in arrears										
590	in arrears up to 90 days										
600	in arrears over 90 days										
610	Split Mortgages - Temporary										
620	of which: Not in arrears										
630	in arrears up to 90 days										
640	in arrears over 90 days										
650	L - 3/6/9/20/10										
660	of which: Not in arrears										
670	in arrears up to 90 days										
680	in arrears over 90 days										
690	L - 4/2/2/20/10										
700	of which: Not in arrears										
710	in arrears up to 90 days										
720	in arrears over 90 days										
730	Other mandated by Law or Min. Decision										
740	of which: Not in arrears										
750	in arrears up to 90 days										
760	in arrears over 90 days										
770	Other Temporary Modification										
780	of which: Not in arrears										
790	in arrears up to 90 days										
800	in arrears over 90 days										
810	<b>Long Term Modifications</b>										
820	Permanent Rate Reduction										
830	of which: Not in arrears										
840	in arrears up to 90 days										
850	in arrears over 90 days										
860	Interest Rate Type Change										
870	of which: Not in arrears										
880	in arrears up to 90 days										
890	in arrears over 90 days										
900	Loan Term Extension										
910	of which: Not in arrears										
920	in arrears up to 90 days										
930	in arrears over 90 days										
940	Split Balance										
950	of which: Not in arrears										
960	in arrears up to 90 days										
970	in arrears over 90 days										
980	Partial Debt Forgiveness / Write-offs										
990	of which: Not in arrears										
1000	in arrears up to 90 days										
1010	in arrears over 90 days										
1020	Additional Collateralisation										
1030	of which: Not in arrears										
1040	in arrears up to 90 days										
1050	in arrears over 90 days										
1060	Operational Restructuring										
1070	of which: Not in arrears										
1080	in arrears up to 90 days										
1090	in arrears over 90 days										
1100	Debt/Family Support										
1110	of which: Not in arrears										
1120	in arrears up to 90 days										
1130	Other Permanent Modification										
1140	of which: Not in arrears										
1150	in arrears up to 90 days										
1160	in arrears over 90 days										
1170	<b>MORTGAGE TO RENT</b>										
1170	Mortgages to Rent Cases										

# Template 8 - Performance of Modifications

Provides a detailed quarterly comparison of the type of modifications performed as part of remedial management activities (excl. denounced)

	010	020	030	040	070	080	090	100	110	120	130	140	150
Modifications Performed (excl. denounced loans)	Current Quarter									Previous Quarter			
	Balance (€bn)	Loan Count	Origin % Above 90 dpd	Origin % Repeat Modified	Modified during same quarter of previous year PD w/ in 3 months from modification	Modified during same quarter of previous year PD w/ in 6 months from modification	Modified during same quarter of previous year PD w/ in 9 months from modification	Modified during same quarter of previous year PD w/ in 12 months from modification	Cure Rate	Balance (€bn)	Loan Count	Origin % Above 90 dpd	Origin % Repeat Modified
As of (DD.MM.201X)													
010 Total Modified Loans as of 31.12.2013													
020 Modified Loans during reporting period													
030 Short term modification <sup>(1)</sup>													
040 Interest Only													
050 Reduced payment above IO													
060 Reduced payment below IO													
070 Temporary Grace Period													
080 Skip Payment													
090 Arrears Settlement													
100 Arrears Capitalisation													
110 L. 3869/2010													
120 L. 4224/2013													
130 Other mandated by Law or Min. Decision													
140 Other													
150 Long term modification <sup>(1)</sup>													
160 Permanent Rate Reduction													
170 Interest Rate Type Change													
180 Loan Tenor Extension													
190 Split Balance													
200 Partial Debt Forgiveness / Write-offs													
210 Additional Collateralisation													
220 Operational Restructuring <sup>(2)</sup>													
230 Debt/Equity Swap <sup>(2)</sup>													
240 Other													
250 Total NPE Portfolio Cure Rate: Modified Loans moved to Performing status as per BoG probation period definition during reporting period													
260 Closure Procedures <sup>(1)</sup>													
270 Voluntary Surrender													
280 Mortgage to Lease													
290 Mortgage to Rent													
300 Outright Sale/Disposal/Discounted Pay-off													
310 Trade Down													
320 Receivership													
330 Collateral Repossession / Liquidation													
340 Enforcement / Legal Action													
350 Other													

Note (1): As per relevant definitions

Note (2): For Corporate / SME loans only

All re-default data are based on modified loans that remain in effect at the specified amount of time after the modification. All loans that have been repaid in full, been refinanced, been sold, or completed the foreclosure process are removed from the calculation. Data include only modifications that have had time to age the indicated number of months