

## **Reporting Instructions for Executive Committee Act 175/2/29.07.2020**

October 2020

## Contents

General principles.....	4
Scope of the reporting templates.....	4
Template 1: Portfolio Segmentation .....	5
1. Category of Exposures.....	5
2. Key data for Template 1 .....	7
3. Asset classes .....	8
Template 2: Collaterals .....	10
1. Category of Exposures.....	10
2. Key data for Template 2 .....	11
3. Asset classes .....	12
Template 3: Legal Workout Activities.....	13
1. Key data for Template 3 .....	13
2. Workout activities.....	13
3. Asset classes .....	14
Template 4: Flows.....	15
1. Categories of Exposures .....	15
2. Key data for Template 4 .....	18
3. Asset classes .....	20
Template 5: Sector Analysis for Business Loans.....	21
1. Categories of Exposures .....	21
2. Key Data for Template 5.....	22
3. Sector analysis .....	23
Template 6: Performance of Modifications & Closure Actions.....	24
1. Types of modification.....	24
2. Key Data for Template 6.....	28
3. Asset classes .....	30
Template 7: Other Input Data .....	31
1. Individual Input Data.....	31
Template 8: Code of Conduct.....	36
1. Key Data for Template 8.....	36
2. Data on Code of Conduct.....	37
Template 8a: Code of Conduct - Third Party's Portfolio under Management .....	40
1. Key Data for Template 8a .....	40

2. Data on Code of Conduct.....	40
Template 9: Vintage Analysis .....	44
1. Types of modification.....	44
2. Key Data for Template 9.....	44
3. Modification Periods for Template 9 .....	45
4. Asset Classes.....	45
Template 10: Auction procedures .....	47
1. Categories of Assets .....	47
2. Template 10 data .....	48
Template 11: Collateral obtained by taking possession .....	50
1. Category of Exposures.....	50
2. Key data for Template 11 .....	52
Template 12: Participation to Out-of-Court Workout (OCW).....	55
1. Categories of Negotiations .....	55
2. Key data for Template 12 .....	55
Actual Operational TARGETs and KPIs .....	58
Additional Monitoring Indicators .....	58

## General principles

The “reference date” shall be the 31/3, 30/06, 30/09 and 31/12, while the “reference period” shall be the first, second, third and fourth quarter respectively.

## Scope of the reporting templates

The scope of the reporting templates is focused on aggregate loans and advances measured at<sup>1</sup>:

- cost<sup>2</sup> or at amortized cost<sup>3</sup>,
- fair value through other comprehensive income or through equity subject to impairment, and
- strict LOCOM<sup>4</sup> or fair value through profit or loss or through equity not subject to impairment.

‘Loans and advances’<sup>5</sup> are debt instruments held by the institutions that are not securities. This perimeter includes ‘loans’ in accordance with the ECB BSI Regulation as well as ‘advances’ that cannot be classified as ‘loans’ according to the ECB BSI Regulation.

For the purposes of our reporting Loans and advances shall be reported for all counterparty types<sup>6</sup>, excluding “Central Banks” and “Credit Institutions”,<sup>7</sup> as submitted in the respective template, F18, of FINREP.

Gross carrying amount of debt instruments shall be reported as defined in European Banking Authority (EBA), Annex V. Part 1. 34.

Accumulated impairment shall be reported as defined in EBA, Annex V. Part 2. 238.

---

<sup>1</sup> Regulation (EU) No 680/2014, Annex V, Part 2, §218, §233

<sup>2</sup> BAD Art.35; Accounting Directive Art.6(1)(i) and Art.8(2); Regulation (EU) No 680/2014, Annex V.Part1 §18, §19

<sup>3</sup> IFRS 7.8(f); IFRS 9.4.1.2

<sup>4</sup> LOCOM: Lower of COst or Market value.

<sup>5</sup> Regulation (EU) No 680/2014, Annex V, Part 1, §32; Part 2 §85 (g).

<sup>6</sup> Regulation (EU) No 680/2014, Annex V, Part 1, §42 (v 2.7).

<sup>7</sup> Loans and advances classified as “Held for Sale” are not included in the perimeter of our reporting.

## Template 1: Portfolio Segmentation

The Template is filled-in with values (amounts in thousands euro and number of units where appropriate) for selected data (in rows) per category of exposure allocated in the respective columns and repeated for every asset class in the respective groups of rows. Template 1 is submitted on a solo and consolidated basis.

### 1. Category of Exposures

“Exposure” means an asset or off-balance sheet item (Regulation EU No 575/2013, Article 5). Exposures, for the purposes of this Template, are split into the following categories:

**A. Gross Loans (B+C)**, (EBA), Annex V. Part 2. 213-239). No data shall be reported to this column, as this shall be automatically filled-in with the data reported in columns B “Total Performing Exposures” and C “Total Non-Performing Exposures”.

- ***of which with Forbearance Measures***. No data shall be reported to this column, as this shall be automatically filled-in with the sum of data reported in the columns that refer to Performing and Non-Performing Exposures with Forbearance Measures.

For avoidance of doubt, loans under legal protection for which a final court decision has been made prescribing repayment terms to the borrower (for example Law 3869/2010, Law 4605/2019, pre-bankruptcy process), shall be reported as “forborne loans”. For the sake of clarity please note that, any temporary modification, in the context of a temporary order for minimum payments during the procedure of accession to Law 3869/2010 or Law 4605/2019, is not considered as forbearance.

For the purposes of our reporting, if a forborne loan is denounced the forbearance status is relinquished and the loan is solely reported as denounced.

For the purposes of our reporting, if a denounced loan is offered long term forbearance measures or closure actions rendering it viable, which are contractually agreed, the remaining balance shall be transferred from “denounced” to “Non-performing Forborne”. Henceforth, the loan will be monitored according to EBA (Annex V. Part 2. 240-268). In the case of re-default, the exposure can be again reclassified as “denounced”, when the bank initiates anew legal actions consistent to denouncement.

**B. TOTAL Performing Exposures**, (EBA, Annex V. Part 2. 213-239). No data shall be reported to this column (except “Collateral”, “Quarterly Impairment Losses” and “Write-offs”) as this shall be automatically filled-in with the sum of data reported in the buckets below (EBA, Annex V. Part 2. 235):

- Current. Subcategory of exposures with 0 days past due (“dpd”).
- 1-30 dpd. Subcategory of exposures with 1-30 dpd.
- 31-60 dpd. Subcategory of exposures with 31-60 dpd.
- 61-90 dpd. Subcategory of exposures with 61-90 dpd.

- ***of which with Forbearance Measures.*** This column shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures (EBA, Annex V. Part 2. 240-268).

**C. TOTAL Non-Performing Exposures (D+E+F),** (EBA, Annex V. Part 2. 213-239). No data shall be reported to this column (except “Quarterly Impairment Losses”) as this shall be automatically filled-in with the sum of exposures in the following categories (D, E and F).

- ***of which with Forbearance Measures.*** No data shall be reported to this column which refers to Non-Performing Exposures with Forbearance Measures (EBA, Annex V. Part 2. 240-268) as this shall be automatically filled-in with the sum of exposures with forbearance measures of categories “D” and “E” analyzed below.

**D. Unlikely to pay that are not past due or past due ≤90 dpd.** Subcategory of exposures deemed as Non-Performing even though they are either under “current” or “past due up to 90 days” status (EBA, Annex V. Part 2. 236).

- ***of which with Forbearance Measures.*** This column shall present the exposures with forbearance measures of category “D” (EBA, Annex V. Part 2. 240-268).

**E. Exposures in Arrears, above 90 dpd excluding Denounced Loans.** The column presents the subcategory of exposures that are in arrears status, above 90 dpd. For the purposes of this Template denounced loans, as defined below, are excluded and reported separately. The column shall only be completed for “Collateral” and “Write-offs”. No data shall be reported to this column for the rest of categories as this shall be automatically filled-in with the sum of data reported in the buckets below (EBA, Annex V. Part 2. 236):

- 91-180 dpd. Subcategory of exposures with 91-180 dpd.
  - 181-360 dpd. Subcategory of exposures with 181-360 dpd.
  - 361-720 dpd. Subcategory of exposures with 361-720 dpd.
  - 721+ dpd. Subcategory of exposures with over 721 dpd (2 years).
- ***of which with Forbearance Measures.*** The column shall present exposures with forbearance measures of category “E” (EBA, Annex V. Part 2. 240-268).

**F. Denounced Loans.** Denounced loans are loans whose contract has been called off (i.e. terminated) by the lender and the denouncement has been properly announced to the debtor. For the purposes of our reporting, as soon as a forborne loan is denounced the forbearance status is relinquished and the loan is solely reported as denounced. If a denounced loan is offered long term forbearance measures or closure actions rendering it viable, which are contractually agreed, the remaining balance shall be transferred from “denounced” to “Non-performing Forborne”. Henceforth, the loan will be monitored according to EBA (Annex V. Part 2. 240-268). In the case of re-default, the exposure can be again reclassified as “denounced”, when the bank initiates anew legal actions consistent to denouncement.

## 2. Key data for Template 1

For the purposes of Template 1 and with clear distinction to the respective columns per exposure category (as analyzed above) the following data shall be filled-in:

- **Number of Loans.** The number of loans shall be reported.
- **Balance.** The gross balance of the exposures<sup>8</sup> that refer to on-balance sheet items at the reporting date shall be reported.
  - **Of which with pending application for Legal Protection.** The gross balance of the exposure, for which debtors have an application for Legal Protection and for which a final court decision is pending, shall be reported in this row. Pending applications for the approval of corporate restructuring plans in the context of the Bankruptcy Law shall also be included in this row. For the sake of clarity please note that, any temporary modification, in the context of a temporary order for minimum payments during the procedure of accession to Law 3869/2010 or Law 4605/2019, is not considered as forbearance.
- **Off-Balance Sheet Exposure.** The gross balance of the exposures that refer to off-balance sheet items at the reporting date shall be reported (EBA, Annex V. Part 2. 217, 219, 227).
- **Collateral.** The value of the collaterals associated with the exposures that refer to on-balance sheet items shall be reported in this row. Personal and corporate guarantees are not included in collaterals. Where the value of the collateral(s) exceeds the gross carrying amount of the exposure, the value of the collateral(s) should be capped to the gross carrying amount of the exposure. For exposures that have simultaneously more than one type of collateral, then the amount of the collateral shall be allocated according to its quality, starting from the one with the best quality (EBA, Annex V. Part 2. 174). For the exposures reported under category “B” and “E”, the break-down of collaterals per bucket is not required.
- **Accumulated Impairment.** The amount of accumulated provisions<sup>9</sup> for exposures that refer to on-balance sheet items at the reference date shall be reported. The amounts should be reported with a negative sign.
- **Quarterly Impairment Losses.** The amount of provisions (i.e. loan loss provisions / flow) for the on-balance exposures that have been recognized for the reporting period shall be reported for total performing and total non-performing loans. The total amount reported shall reconcile with the Profit & Loss (PL) charge for the reference period. Impairment losses shall be filled-in only for total performing and total non-performing exposures.
- **Write-offs.** The amount of write-offs during the reference period shall be reported. For the exposures reported under category “B” and “E”, the break-down of write-offs per bucket is not required. The amounts shall be reported with negative sign.

---

<sup>8</sup> Regulation (EU) No 680/2014, Annex V, Part 1 §34, Part 2 §218, §233

<sup>9</sup> Regulation (EU) No 680/2014, Annex V, Part 1 §34, Part 2 §69-71, §218, §233

### 3. Asset classes

Data in Template 1, reported per exposure category in the respective columns, is further analyzed per asset class, according to Annex III of this Act, into repetitive groups of rows. More specifically, the total of loan portfolios' is split into three main asset classes (Residential, Consumer and Business Loans) and it is further split into subclasses where appropriate. For the purposes of this Act, the three main asset classes and the four subclasses of Business Loans are mutually exclusive. In that way, the information reported for the three main asset classes arises from the respective aggregation of their subclasses.

**TOTAL.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum of the respective data (per row and column) of the three main asset classes of loan portfolios'.

As a memo item, entities required to submit this report shall specify, for the total of their credit exposures, which of those exposures are to be included in the following categories, as those are defined in Annex III, and they shall report them in the respective groups of lines:

- **of which Public.** Credit Exposures to:
  - i) State Corporations and entities of private and public law, as those are defined by Greek Law 3429/2005, article 1, paragraph 1, 2, 3 and 6.
  - ii) Regional and Local authorities.
- **of which State-Related.** Credit Exposures where:
  - i) Greek State or Hellenic Fund for Entrepreneurship and Development (ETEAN S.A.) serves as guarantor or
  - ii) a receivable from the Greek state exists (for example VAT receivable, accrued rent on buildings, unpaid government subsidy, invoices, receivables from infrastructure concessions).

The two aforementioned categories are mutually exclusive. The exposures presented in those categories shall be included in the asset classes below.

**TOTAL Residential Loans.** In this section exposures to households for the acquisition or the maintenance / refurbishment of residential property shall be reported.

**TOTAL Consumer Loans.** No data shall be reported to this section as this shall be automatically filled in with the sum of the respective items (per line and column) of the mutually exclusive subclasses mentioned below:

- **Revolving Consumer Credit.** Credit exposures to households for the coverage of consumer needs with a credit limit. Credit cards, overdrafts and revolving consumer loans shall be included.
- **Non-revolving Consumer Credit.** Credit exposures to households for the coverage of consumer needs with a predetermined amortization repayment schedule.

**TOTAL Business Loans.** No data shall be reported to this section as this shall be automatically filled-in with the sum (per row and column) of the following mutually exclusive subclasses mentioned below:

- **Small Business & Professionals - SBPs.** Credit exposures to professionals and businesses with turnover less than 2.5 million euro.
- **Small & Medium Enterprises - SMEs.** Credit exposures to businesses with turnover above 2.5 million euro and below 50 million euro.
- **Corporate.** Credit exposures to businesses with turnover above 50 million euro.
- **Shipping Finance.** Credit exposures to shipping finance. Business loans that belong to this portfolio shall not be included in the first three asset classes, regardless of companies' turnover threshold. In that way all asset classes shall be mutually exclusive. Ideally, data reported in this asset class shall reconcile with the relevant data reported in Template 5, in "Shipping" sector.

Banks can override the turnover threshold based on internal organization of their business lines.

## Template 2: Collaterals

Collaterals reported in Template 1, per asset class and category of exposure, are analyzed in Template 2 per asset class and type of collateral. The amount of collateral refers to the reference date unless instructed otherwise. Personal and corporate guarantees are not included in collaterals. The amount of the collateral reported shall not exceed the gross carrying amount of the loan. For exposures that have simultaneously more than one type of collateral the amount of the collateral shall be allocated according to its quality, starting from the one with the best quality (EBA, Annex V. Part 2. 174). Template 2 is submitted on a solo basis.

### 1. Category of Exposures

**A. TOTAL Collateral Value (B+C).** No data shall be reported to this column, as this shall be automatically filled-in with the data reported in columns B “Value of Collaterals related to Performing Exposures” and C “Value of Collaterals related to Total Non-Performing Exposures”.

- ***of which with Forbearance Measures.*** No data shall be reported to this column, as this shall be automatically filled-in with the data reported in columns B “Value of Collaterals related to Performing Exposures / of which with forbearance measures” and C “Value of Collaterals related to Total Non-Performing Exposures / of which with forbearance measures”.

For the total collateral value **Evolution within the Quarter** shall be reported, analyzed in the following categories.

- **Fair Value Adjustment (+/-).** All changes in the fair value of collateral during the reference period, as defined by the International Financial Reporting Standards (IFRS), shall be reported in this column per collateral category. This field will include changes resulting solely from the valuation of collaterals. If the amount of the collateral exceeds the amount of the exposure after the fair value adjustment, the adjustment shall not be reported.
- **Additional Collateral (+).** Additional collateral received during the reference period shall be reported in this column at cost, as defined by IFRS, per collateral category. If, as a result of the acquisition of additional collateral, collateral value exceeds the amount of the exposure, then only the amount up to the amount of the exposure shall be reported. Amounts shall be recorded with a positive sign.
- **Liquidation of Collateral (-).** Collaterals liquidated during the reference period shall be reported in this column. Amounts shall be recorded with a negative sign.

**B. Value of Collaterals related to Performing Exposures.** Collaterals related to performing exposures, as defined for Template 1 (B), shall be reported in this column.

- ***of which with Forbearance Measures.*** Collaterals related to performing exposures with Forbearance Measures shall be reported in this column.

**C. Value of Collaterals related to Total Non-Performing Exposures (D+E+F).** No data shall be reported to this column, as this shall be automatically filled-in with the data reported in categories of exposure below (D, E and F).

- **of which with Forbearance Measures.** No data shall be reported to this column which refers to collaterals related to Non-Performing Exposures with Forbearance Measures, as this shall be automatically filled-in with the sum of exposures with forbearance measures of categories “D” and “E” analyzed below.

**D. Unlikely to Pay that are not past due or past due ≤90 dpd.** Collaterals related to the subcategory of “Unlikely to Pay that are not past due or past due ≤90 dpd” shall be reported in this column.

- **of which with Forbearance Measures.** Collaterals related to the exposures with forbearance measures of category “D”, shall be reported in this column.

**E. Exposures in Arrears above 90 dpd excluding Denounced Loans.** The amount of Collaterals related to the subcategory of “Exposures in arrears Above 90 dpd excluding denounced loans” shall be reported in this column.

- **of which with Forbearance Measures.** Collaterals related to the exposures with forbearance measures of category “E”, shall be reported in this column.

**F. Denounced Loans.** Collaterals related to denounced loans shall be reported in this column.

## **2. Key data for Template 2**

For Template 2 and with clear distinction to the respective columns per exposure category (as analyzed above) the following collateral data shall be reported, which must be mutually exclusive and reconcile with the TOTAL collaterals as reported in Template 1:

**TOTAL.** No data shall be reported to this row, as this shall be automatically filled-in with the data reported in categories of collaterals below. Total collaterals reported in Template 2, analyzed per exposure category in the respective columns must reconcile with the value of collateral reported in Template 1, row “**Collateral**” for each asset class and exposure category.

- **Cash & Cash Equivalents.** Collaterals in the form of cash or cash equivalents. Cash includes sight, demand and time deposits while cash equivalents refer to short-term highly liquid investments which are readily convertible to an exact amount of cash and subject to insignificant risk of change in value (for example mutual funds on cash equivalents) (EBA, Annex V. Part 2. 173b).
- **Residential Real Estate.** Collaterals in the form of residential property (houses, apartments etc.) or with potential use in the future as such (unfinished residential property etc.) along with auxiliary spaces. Plots which are intended to be used for the construction of residential property are also included in this category (EBA, Annex V. Part 2. 173a)
- **Commercial & Industrial Real Estate.** Collaterals in the form of commercial or industrial property which can be used for business and/or investment purposes and belong to one of the following general categories based on their use: offices, stores, storage, industrial facilities, hotels, restaurants, theaters, other business use (parking, gas station, etc.) as well as the total of the subcategories which they include. – (EBA, Annex V. Part 2. 173).
- **Other Real Estate.** Collaterals in the form of real estate property other than residential and commercial real estate (e.g. agricultural land).
- **Greek Government Guarantee.** Collateral in the form of guarantee by the Greek State or the Hellenic Fund for Entrepreneurship and Development (ETEAN).

- **Other Financial Guarantees Received.** Includes any financial guarantees received other than “Greek Government Guarantee”, e.g. guarantees from credit institutions, letters of guarantee, letters of credit (EBA, Annex V. Part 2. 173c, EBA, Annex V. Part 2. 114).
- **Vessels.** Collaterals in the form of ships.
- **Industrial & Mechanical Equipment.** Machinery, mechanical and technical equipment.
- **Inventories & Commodities.** Merchandise, finished and semi-finished products, raw materials etc.
- **Assigned Receivables.** Collaterals in the form of receivables from third parties (excluding State).
- **Assigned Receivables against the State.** Collaterals in the form of receivables from the Greek State (e.g. VAT, income tax).
- **Treasury Bills & Greek Government Bonds.** Treasury Bills and Greek Government Bonds regardless of maturity.
- **Other Collateral.** Includes any kind of financial or tangible collateral, not included in the above mentioned categories (e.g. corporate bonds, equities etc.).

### **3. Asset classes**

Data in Template 2, reported per exposure category in the respective columns, is further analyzed per asset class, according to Annex III of this Act, into repetitive groups of rows. More specifically, total collateral is split into three main asset classes (Residential, Consumer and Business Loans) and it is further split into four subclasses for Business Loans.

**TOTAL.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum of the following asset classes.

- **Residential Loans.** Collaterals for residential loans, as defined in for Template1, shall be reported in this section.
- **Consumer Loans.** Collaterals for consumer loans, as defined in for Template1, shall be reported in this section.
- **Business Loans.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum of the respective data (per line and column) of the four mutually exclusive loan portfolios mentioned below:
  - **Small Business & Professionals - SBPs.** Collaterals for Small Business Loans and Professionals, as defined in for Template1, shall be reported in this subsection.
  - **Small & Medium Enterprises - SMEs.** Collaterals for Small and Medium Enterprises, as defined in for Template1, shall be reported in this subsection.
  - **Corporate.** Collaterals for large Corporates, as defined in for Template1, shall be reported in this subsection.
  - **Shipping.** Collaterals for Shipping finance, as defined in for Template1, shall be reported in this subsection.

### Template 3: Legal Workout Activities

Template 3 presents workout activities for denounced loans (amounts in thousands euro and numbers of units where appropriate) per exposure, Loan Count or collateral value and repeated for every asset class in the respective groups of rows. Template 3 is submitted on a solo basis.

#### 1. Key data for Template 3

- **Gross Exposure (€ thousand).** Total Denounced Exposures are reported in this column. Gross exposures refer to on-balance sheet items at the reporting date. Total amount of denounced exposures must reconcile with the respective amounts reported in Template 1 per exposure category.
- **Number of Loans.** Number of denounced contracts must be reported in this column. Total number of denounced contracts must reconcile with the respective number reported in Template 1 per exposure category.
  - **of which to Idle Businesses.** Number of denounced contracts related to idle businesses must be reported in this column. This column shall be completed only for “Small & Medium Enterprises – SMEs”, “Corporate” and “Shipping Finance” for the Business Loans portfolio. The term “Idle business” refers to businesses with no activity during the reference period, excluding businesses with seasonal activities. In any case, businesses which are in a “state of inactiveness” or are under bankruptcy procedures are considered idle. For the sake of clarity, please note that businesses subject to article 99 of bankruptcy law (Law 3588/2007) are not necessarily considered as idle.
- **Collateral Value (€ thousand).** Total collateral value in € thousand shall be reported in this column. Personal or corporate guarantees are not included in collaterals. The value of collateral reported for “**Total Denounced Exposures**” shall reconcile with the respective data reported in Template 1 and Template 2.

#### 2. Workout activities

For the purposes of Template 3 with clear distinction to the respective columns per exposure category, the following data shall be filled-in:

**Total Denounced Exposures.** No data shall be reported to this row, as this shall be automatically filled-in with the data reported in the following workout activities. Total denounced exposures shall reconcile with the respective data reported in Template 1 and Template 2.

- **No action taken.** Denounced exposures for which no action has been taken by the credit institution shall be reported in this row.
- **Call on Greek Government Guarantee.** Loans guaranteed by the Greek State, which have been denounced in order to call on the guarantee from the Greek State.
- **Out of court Settlement.** This column is filled-in with the denounced loans for which the credit institution has made an out-of-court settlement with the borrower. It should be noted that if the borrower fails to fulfill his obligations under the settlement agreement for more than three months, the respective loans will no longer be classified in this category.
- **Procedure to Obtain Enforceable Title.** This column is filled-in with the denounced loans for which the credit institution has initiated procedure to obtain enforceable title (e.g. lawsuit, application for court payment order etc.)

- **Enforcement Right Granted.** This column is filled-in with the denounced loans for which the credit institution has obtained enforceable title (e.g. court payment order, court decision etc.) and may initiate foreclosure procedures.

**Of which:**

- **Unsecured.** Denounced loans of the above category without collateral shall be reported. The “Collateral value” column shall not be completed.
- **Under Auction Procedure.** Denounced loans of the above category for which credit institutions have obtained enforceable title and have initiated foreclosure procedures (either by the credit institution or a third party) shall be reported.
- **Application for Legal Protection.** Denounced loans under application for Legal protection and for which a court decision is pending, are reported in this row. Loans may relate to individuals (e.g. Law 3869/2010, Law 4605/2019) or legal entities (e.g. Law 4307/2014, Bankruptcy Code). Application towards Bankruptcy Process and application for corporate restructuring plan approval in the context of the Bankruptcy Law are also included in this row.
- **Under Bankruptcy.** Loans under Bankruptcy procedures without legal protection (e.g. article 99 of the Bankruptcy Code) for which a final court decision has been reached are reported in this row.

### 3. Asset classes

Data of Template 3, reported per exposure category in the respective columns, is further analyzed per asset class, according to Annex III of this Act, into repetitive groups of rows. More specifically, total amount of denounced loans is split into three main asset classes (Residential, Consumer and Business Loans) and it is further split into four subclasses for Business Loans. The abovementioned asset classes and subclasses are mutually exclusive. In that way the information reported for Total and Business Loans arises from the respective aggregation of their subclasses.

- **TOTAL.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum of the respective data (per row and column) of the three main categories of loans.
- **Total Residential Loans.** In this section data on denounced exposures to residential exposures, as defined for Template 1, shall be reported.
- **Total Consumer Loans.** In this section data on denounced exposures to consumer exposures, as defined for Template 1, shall be reported.
- **Total Business Loans.** No data shall be reported to this section as this shall be automatically filled-in with the respective items (per line and column) of the four mutually exclusive loan portfolios mentioned below:
  - **Small Business & Professionals - SBPs.** In this section data on denounced exposures to SBPs, as defined for Template 1, shall be reported.
  - **Small & Medium Enterprises - SMEs.** In this section data on denounced exposures to Small and Medium Enterprises, as defined for Template 1, shall be reported.
  - **Corporate.** In this section data on denounced exposures to large Corporates, as defined for Template 1, shall be reported.
  - **Shipping.** In this section data on denounced exposures to Shipping finance, as defined for Template 1, shall be reported.

## Template 4: Flows

Template 4 is completed with values (amounts in thousands euro) presenting flows of Performing and Non-Performing Gross Exposures (excluding off-balance sheet exposures) among mutually exclusive categories of loans, during the reference period, as well as changes in balance of exposures by category. Opening balances at the beginning of the reference period must also be reported so that the closing balances at the reporting date derive. Template 4 is submitted on a solo basis.

### 1. Categories of Exposures

“Exposures” for the purposes of this template refer to on-balance sheet items and are split into the following mutually exclusive categories:

**Performing Exposures**, (EBA, Annex V. Part 2. 213-268). Performing exposures shall be analyzed in the following mutually exclusive categories:

- **Current (0 dpd).** Exposures with 0 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures without Forbearance Measures.
  - **Forborne reclassified from NPE.** This field shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures which have been reclassified from NPEs and remain in this category for a probation period of two years. According to EBA, Annex V Part 2. 256-264, only current exposures from the Non-Performing Forborne category can be reclassified into this category after one year of probation. After the 2 year probation and if the conditions, specified in EBA (Annex V Part 2. 259), are met the exposures of this category can be classified at current not forborne exposures.
  - **Other Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures other than those reclassified from NPE.
- **1-30 dpd.** Exposures with 1-30 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures without Forbearance Measures.
  - **Forborne reclassified from NPE.** This field shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures which have been reclassified from NPE and remain in this category for a probation period of two years. According to EBA, Annex V Part 2. 256-264, only 1-30 dpd exposures from the Non-Performing Forborne category can be reclassified into this category after one year of probation. After the 2 year probation and if the conditions, specified in EBA (Annex V Part 2. 259), are met the exposures of this category can be classified at current not forborne exposures. Please note that Performing Forborne Exposures reclassified from NPE which become more than 30 dpd, shall be classified as Non-Performing.
  - **Other Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures other than those reclassified from NPE.
- **31-60 dpd.** Exposures with 31-60 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures.

- **61-90 dpd.** Exposures with 61-90 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures.

**Non-Performing Exposures**, (EBA, Annex V. Part 2. 213-268). Non-performing exposures shall be analyzed in the following mutually exclusive categories:

- **UTP Current (0 dpd).** Exposures with 0 dpd which are unlikely to pay (UTP).
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures. According to EBA, Annex V Part 2. 256-264, current exposures under one year probation period are reported in this category.
- **UTP 1-30 dpd.** Exposures with 1-30 dpd which are unlikely to pay.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures. According to EBA, Annex V Part 2. 256-264, 1-30 dpd exposures under one year probation period are reported in this category.
- **UTP 31-90 dpd.** Exposures with 31-90 dpd which are unlikely to pay.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures.
- **91-180 dpd.** Exposures with 91-180 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures.
- **181-360 dpd.** Exposures with 181-360 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures.
- **361-720 dpd.** Exposures with 361-720 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.
  - **Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures.
- **721+ dpd.** Exposures with over 721 dpd.
  - **Not Forborne.** This field shall be filled-in with the amounts referring to Non-Performing Exposures without Forbearance Measures.

- ***Forborne.*** This field shall be filled-in with the amounts referring to Non-Performing Exposures with Forbearance Measures.
- **Denounced.** Denounced exposures

## 2. Key data for Template 4

For the purposes of Template 4 with clear distinction to the respective columns per exposure category (as analyzed above) balances shall be reported (amounts in thousands euro) representing:

**A. Beginning of period.** Opening balances (gross carrying amount excluding off-balance sheet items) at the beginning of the reference period must be reported per category of exposure. Opening balances shall be the closing balances of the previous reporting date and must be completed in order for the closing balance at the reference date to be generated.

**B. Flows of Exposures during the reference period.** Data which refer to outflows of Exposures shall be presented per category of exposure, in the respective row, with a negative sign. Specifically:

- Flows reported are among mutually exclusive categories presented per row and column.
- The intersection of each category is marked in grey and shall not be completed. These fields, which create a diagonal in the table, will automatically generate the opposite amount of the sum of outflows reported per column, hence presenting the sum of inflows per category of exposure; i.e. the sum of each column will be zero while the sum of each row will generate the closing balance per category.
- Besides the intersection fields discussed above, all other fields marked in grey represent reclassifications which are not permitted and therefore cannot be completed. Namely those reclassification are:
  - From Performing below 60 dpd to Non-performing +181 dpd due to time constraint
  - From Performing 61-90 dpd to Non-performing +361 dpd due to time constraint
  - From UTP Non-performing current or 1-30 dpd to Non-performing +181 dpd due to time constraint
  - From Non-performing 31-180 dpd to Non-performing +361 dpd due to time constraint
  - From Non-performing 181-360 dpd to Non-performing +721 dpd due to time constraint
  - From Non-performing / Forborne to any performing category other than Performing / current or 1-30 dpd / Forborne reclassified from NPE. Only forborne loans which have completed the one year probation period will be reclassified here according to EBA, Annex V. Part 2. 256-264
  - From denounced to any performing category and non-performing category other than UTP Non-performing / current to 90 dpd / Forborne. Denounced loans offered substantial long term forbearance measures or closure actions rendering it viable, which are contractually agreed, the remaining balance shall be transferred from “denounced” to “Non-performing Forborne”. Henceforth, the loan will be monitored according to EBA (Annex V. Part 2. 240-268). In the case of re-default, the exposure is again reclassified as “denounced” when the bank initiates again legal action against the debtor.

**C. Change of Balance.** Data which refers to all possible changes in exposures’ balance, during the reference period, shall be reported per category of exposure in the respective columns, in order to generate the closing balance at the reporting date, namely:

- **Purchase of loans.** Loans purchased from other institutions.
- **Disbursements.** Additional amounts disbursed during the period.

- **Arrears capitalization.** Capitalized past due amounts including any capitalized fees, expenses, off-balance interest (due to modification) etc. Accrued interest shall not be included in this category, as it will be monitored separately. (Amounts shall be recorded with a positive sign).
- **Accrued Interest.** Loan balance increases due to accrued interest (payable or non-payable) during the reference period without taking into account other movements (e.g. interest payments).. (Amounts shall be recorded with a positive sign).
- **Loan payments.** Regular payments of capital and any ad hoc repayments. (Amounts shall be recorded with a negative sign).
- **Sale of loans.** Loan balance changes stemming from loans sold to other institutions, excluding intragroup transactions. For the avoidance of doubt, please note that the total balance of the loan is reported and not its evaluation or price during the transaction<sup>10</sup>. (Amounts shall be recorded with a negative sign).
- **Transfer to Held for Sale.** Any loan balance changes resulting from the categorization/re-categorization of loans as 'Held for Sale' (also depicted in the published financial statement) shall be reported in this column (Amounts shall be recorded with the appropriate sign). In accordance with IFRS 5 'Non-current Assets Held for Sale and Discontinued Operations', non-current assets that are expected to be recovered principally through a sale transaction, along with the related liabilities, are classified as 'Held for Sale' ('HFS'), subject to certain conditions<sup>11</sup>.
- **Intragroup transfers.** Transfer of loans to / from another Group company / subsidiary including sale of loans. (Amounts shall be recorded with the appropriate sign).
- **Collateral liquidation or repossession.** The effect on the balance of the loan from the liquidation or repossession of any kind of collateral shall be reported. Repossession refers to acquisition of non-cash collateral for which the credit institution or a group subsidiary has acquired ownership and has not yet sold it to a third party. Liquidation includes also Voluntary Sale of Property as well as the liquidation or repossession of property other than the one used as collateral. For the avoidance of doubt, please note that the total balance of the loan is reported, including any potential partial write-off<sup>12</sup>. (Amounts shall be recorded with a negative sign).
- **Write-Offs.** Total exposures' full of partial write-offs recorded during the reference period. For the avoidance of doubt, please note that for the purposes of the current report that reflects the changes of loans' balance, any potential partial write-offs that has already been reported in previous columns (e.g. sale of loans, collateral liquidation or repossession) shall not be included in the current column. (Amounts shall be recorded with a negative sign).
- **Other adjustments.** Any other increases or decreases reported to the balance of exposures by the credit institution which are not covered by the existing fields for change of balance. Namely those adjustments may include FX changes, other closure actions (for example debt-to-equity swap), reclassifications between asset classes, modification gains or losses etc. Accrued interest shall not be included in this category, as it will be monitored separately. Additionally corrections or one-off reclassifications shall be included under this category (e.g. reclassification of loans under Law 3869/2010 or Law 4605/2019 from not-forborne to forborne).

<sup>10</sup> For the avoidance of doubt, please note that the total balance of the loan is reported, including any potential partial write-off.

<sup>11</sup> For the HFS classification to be applied, specific conditions set out in IFRS 5 [6-8] must be met.

<sup>12</sup> In the case where the potential respective partial write-offs may delay more than a quarter following the liquidation or repossession date (due to operational reasons or further pending collection actions) they shall be reported in the 'Collateral liquidation or repossession' flow category at the quarter they are actually performed.

Please note that for simplicity reasons, “change of balance” for performing loans is not required to be analyzed in every category of change in the respective columns. Only “Purchase of Loans”, “Sale Of Loans”, “Transfer to Held for Sale”, “Intragroup Transfers” and “Other Adjustments» shall be reported.

**D. End of Period, (A+B+C).** No data shall be reported to this column, as this shall be automatically filled-in with the data reported in all previous columns, generating the closing balance at the reporting period. Please note that closing balances should be agreed with the respective balances reported in Template 1 per category of exposure and bucket.

### **3. Asset classes**

Data of Template 4, reported per exposure category in the respective columns, is further analyzed per asset class, according to Annex III of this Act, into repetitive groups of rows. More specifically, the total is split into three main asset classes (Residential, Consumer and Business Loans) and it is further split into four subclasses for Business Loans. For the purposes of this Template, those subcategories are mutually exclusive. In that way the information reported for Total and Business Loans arises from the respective aggregation of their subclasses.

**TOTAL.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum of the following subclasses.

**TOTAL Residential Loans.** In this section data on residential exposures, as defined for Template 1, shall be reported.

**TOTAL Consumer Loans.** In this section data on exposures to households for the coverage of consumer needs, as defined for Template 1, shall be reported.

**TOTAL Business Loans.** No data shall be reported to this section as this shall be automatically filled-in with the respective items (per line and column) of the four mutually exclusive loan portfolios mentioned below:

- **Small Business & Professionals- SBPs.** In this section data on exposures to professionals and businesses, as defined for Template 1, shall be reported.
- **Small & Medium Enterprises - SMEs.** In this section data on exposures to businesses, as defined for Template 1, shall be reported.
- **Corporate.** In this section data on exposures to businesses, as defined for Template 1, shall be reported.
- **Shipping Finance.** In this section data on exposures to shipping finance, as defined for Template 1, shall be reported.

## Template 5: Sector Analysis for Business Loans

Template 5 is completed with values (amounts in thousands euro) and numbers in units (where appropriate) for selected data (in rows) per category of exposure allocated in the respective columns and repeated for every sector in the respective groups of rows. Template 5 is submitted on a solo basis.

### 1. Categories of Exposures

“Exposure” means an asset or off-balance sheet item (Regulation EU No 575/2013, Article 5). Exposures, for the purposes of this template, are split into the following categories:

**A. Gross Loans (B+C)**, (EBA, Annex V. Part 2. 213-239). No data shall be reported to this column, as this shall be automatically filled-in with the data reported in columns B “Total Performing Exposures” and C “Total Non-Performing Exposures”.

- **of which with Forbearance Measures**. No data shall be reported to this column, as this shall be automatically filled-in with the sum of the data reported in the columns that refer to Performing and Non-Performing Exposures with Forbearance Measures as defined in Template 1(A) – “of which with Forbearance Measures” (EBA, Annex V. Part 2. 240-268).

**B. TOTAL Performing Exposures**, (EBA, Annex V. Part 2. 213-239). No data shall be reported to this column (except “Collateral” and “Write-offs”) as this shall be automatically filled-in with the total data reported according to the following buckets (EBA, Annex V. Part 2. 235):

- Current. Subcategory of exposures with 0 dpd.
  - 1-30 dpd. Subcategory of exposures with 1-30 dpd.
  - 31-60 dpd. Subcategory of exposures with 31-60 dpd.
  - 61-90 dpd. Subcategory of exposures with 61-90 dpd.
- **of which with Forbearance Measures**. This column shall be filled-in with the amounts referring to Performing Exposures with Forbearance Measures (EBA, Annex V. Part 2. 240-268).

**C. TOTAL Non-Performing Exposures (D+E+F)**, (EBA, Annex V. Part 2. 213-239). No data shall be reported to this column as this shall be automatically filled-in with the sum of exposures in the following categories (D, E and F).

- **of which with Forbearance Measures**. No data shall be reported to this column which refers to Non-Performing Exposures with Forbearance Measures (EBA, Annex V. Part 2. 240-268) as this shall be automatically filled-in with the sum of exposures with forbearance measures of categories “D” and “E” analyzed below.

**D. Unlikely to Pay that are not past due or past due ≤90 dpd**. Subcategory of exposures deemed as Non-Performing even though they are either under “current” status either under “past due up to 90 days” status (EBA, Annex V. Part 2. 236).

- **of which with Forbearance Measures**. This column shall present the exposures with forbearance measures of category “D” (EBA, Annex V. Part 2. 240-268).

**E. Exposures in Arrears above 90 dpd excluding Denounced Loans.** The column presents the subcategory of exposures that are in arrears status, above 90 dpd. For the purposes of this Template, denounced loans as defined below are excluded. The column shall only be completed for “Write-offs”. No data shall be reported to this column for the rest of categories as this shall be automatically filled-in with the sum of data reported in the buckets below (EBA, Annex V. Part 2. 236):

- 91-180 dpd. Subcategory of exposures with 91-180 dpd.
  - 181-360 dpd. Subcategory of exposures with 181-360 dpd.
  - 361-720 dpd. Subcategory of exposures with 361-1080 dpd.
  - 721+ dpd. Subcategory of exposures with over 721 dpd (2 years).
- **of which with Forbearance Measures.** The column shall present exposures with forbearance measures of category “E” (EBA, Annex V. Part 2. 240-268).

**F. Denounced Loans.** Denounced loans as defined for Template 1 shall be reported.

## **2. Key Data for Template 5**

For the purposes of Template 1, with clear distinction to the respective columns per exposure category (as analyzed above), the following data shall be filled-in:

- **Number of Loans.** The number of loans shall be reported.
- **Balance.** The gross balance of the exposures<sup>13</sup> that refer to on-balance sheet items at the reporting date shall be reported.
- **Off-Balance Sheet Exposure.** The balance of the exposures that refer to off-balance sheet items at the reporting date shall be reported (EBA, Annex V. Part 2. 217, 219, 227).
- **Collateral.** The value of the collaterals associated with the exposures that refer to on-balance sheet items shall be reported in this row. Personal and corporate guarantees are not included in collaterals. Where the value of the collateral(s) exceeds the gross carrying amount of the exposure, the value of the collateral(s) should be capped to the gross carrying amount of the exposure. For exposures that have simultaneously more than one type of collateral, the amount of the collateral shall be allocated according to its quality, starting from the one with the best quality (EBA, Annex V. Part 2. 174). For the exposures reported under category “B” and “E”, the break-down of collaterals per bucket is not required.
- **Accumulated Impairment.** The amount of accumulated provisions<sup>14</sup>, at the reference date, for the exposures that refer to on-balance sheet items shall be reported. Accumulated Impairment should be reported with a negative sign.
- **Write-offs.** The amount of write-offs during the reference period shall be reported. The amounts shall be reported with negative sign.

<sup>13</sup> Regulation (EU) No 680/2014, Annex V, Part 1 §34, Part 2 §218, §233

<sup>14</sup> Regulation (EU) No 680/2014, Annex V, Part 1 §34, Part 2 §69-71, §218, §233

### 3. Sector analysis

Data of Template 5, reported per exposure category in the respective columns, is further analyzed per sector, according to Annex V of this Act, into repetitive groups of rows. In order to achieve homogeneous and coherent reporting from credit institutions, the classification of corporate loans in sectors according to NACE is cited below.

**ALL SECTORS.** No data shall be reported to this section as this shall be automatically filled-in with the sum of all sectors. It should be noted that the sum of all sectors must reconcile with the respective data reported in Template 1 for **TOTAL Business Loans**. In all other sections, data for each sector and subsector (as presented in the table below) must be reported.

- **Manufacturing.** No data shall be reported to this section as this shall be automatically filled-in with the data reported in each sub-sector which are mutually exclusive.
- **Shipping.** Ideally, the amounts reported in this section shall reconcile with the asset class “Shipping” as reported for Template 1.

Sector	NACE CODE
<b>Agriculture</b>	<b>01, 02, 03</b>
<b>Manufacturing</b>	
<i>Of which:</i>	
<i>Manufacture of food products, beverages and tobacco</i>	<i>10, 11, 12</i>
<i>Manufacture of textile products</i>	<i>13, 14, 15</i>
<i>Manufacture of pulp, paper, wood and furniture</i>	<i>16, 17, 31</i>
<i>Petroleum products</i>	<i>19</i>
<i>Manufacture of chemical and pharmaceutical products</i>	<i>20, 21, 22</i>
<i>Manufacture of metal products (metallurgy)</i>	<i>24, 25</i>
<i>Manufacture of electronic products and machinery</i>	<i>26, 27, 28, 33</i>
<i>Other manufacturing activities</i>	<i>23, 29, 30, 32</i>
<b>Energy</b>	<b>35</b>
<b>Construction</b>	<b>41, 42, 43, 71</b>
<b>Wholesale and retail trade</b>	<b>45, 46, 47</b>
<b>Shipping</b>	<b>50</b>
<b>Transport (other than shipping) and storage</b>	<b>49, 51, 52, 53</b>
<b>Accommodation</b>	<b>55</b>
<b>Food services</b>	<b>56</b>
<b>Telecommunication, information and media</b>	<b>18, 58, 59, 60, 61, 62, 63</b>
<b>Financial services</b>	<b>64, 65, 66</b>
<b>Commercial real estate</b>	<b>68</b>

<b>Health services</b>	<b>86, 87, 88</b>
<b>Public administration</b>	<b>84</b>
<b>Other sectors</b>	<b>00, 05, 06, 07, 08, 09, 36, 37, 38, 39, 69, 70, 72, 73, 74, 75, 77, 78, 79, 80, 81, 82, 85, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99</b>

### Template 6: Performance of Modifications & Closure Actions

Template 6 is filled-in with values (amounts in thousands euro and numbers in units where appropriate) for selected items, with clear distinction to the respective columns for the types of modifications and closure actions (in rows), per category of exposure and repeated (in groups of rows) for every asset class. Template 6 is submitted on a solo basis.

#### 1. Types of modification

Data in Template 6 are allocated per type of modification and closure action, according to the types of modification and closure actions of Annex I of this Act. Data must be repeated for every asset class. In specific, types of modification and closure actions are split into the three (3) main categories: “Short Term Modifications” (offered for a period up to two years), “Long Term Modifications” (offered for a period longer than two years) and “Closure Actions” and are further split into individual subcategories. Credit Institutions shall rank modifications and closure actions according to Template IV of Annex I of this Act.

The purpose of this Template is not to exhaustively present all possible modifications and closure actions, but to group and standardize the types which are widely used, in order to have data that are comparable, transparent and better monitored, both per credit institution and on a banking system level. In this context, modifications and closure actions with characteristics that can be classified in more than one type shall be reported only to the type with the greater ranking, according to the waterfall of Section IV in Annex I. For example:

- Modifications that include both arrears capitalization and interest only payment schedule will be reported only in “Interest Only” category.
- Modifications that include arrears capitalization, interest rate reduction for a five year period and term extension will be reported only in “Loan Term Extension” category.

Credit Institutions shall classify modifications and closure actions according to the following table:

Ranking	Types of modification and closure actions	
1	<b>Short Term Modifications</b>	Arrears Capitalization
2		Arrears Repayment Plan
3		Reduced Payment Above IO
4		Interest Only
5		Reduced Payment Below IO
6		Grace Period
7	<b>Long Term Modifications</b>	Interest Rate Reduction
8		Loan Term Extension
9		Split Balance
10		Partial Debt Forgiveness/Write-down
11		Operational Restructuring
12		Debt/Equity Swaps
13	<b>Closure Actions</b>	Other Out-of-Court Settlements
14		Voluntary Surrender
15		Mortgage to Rent/Lease
16		Voluntary Sale of Property
17		Settlement of Loans
18		Loan Sale
19		Auction - Collateral Repossession
20		Auction - Collateral Liquidation
21		Under Legal Protection
22		Debt Write-off

## A. Short Term Modifications

**Total Short Term Modifications.** No data shall be reported to this row as this shall be automatically filled-in with the sum of data reported in each type of modification below.

- **Arrears Capitalization.** Arrears capitalization of past due amounts and readjustment of balance repayment.
- **Arrears Repayment Plan.** Modification of past due amounts' repayment schedule based on a predetermined time schedule.
- **Reduced Payment Above IO.** Modifications that include reduction of the repayment installment at a level exceeding interest-only amount for a specified short-term period.
- **Interest Only.** Modifications that include interest only repayment schedule for a specified short-term period.
- **Reduced Payment Below IO.** Modifications that include reduction of the repayment installment at a level below interest-only amount for a specified short-term period. Unpaid interest shall be either capitalized or settled.
- **Grace Period.** Modifications that include suspension of payments for a specified period. Unpaid interest shall be either capitalized or settled.

Short term Modifications are offered for a period up to two years. However, modifications, which only include the above mentioned short-term measures for a specific period that might exceed two years, shall be reported in short-term modifications.

## B. Long Term Modifications

**Total Long Term Modifications.** No data shall be reported to this row as this shall be automatically filled-in with the sum of data reported in each type of modification below.

- **Interest Rate Reduction.** Modifications that include interest rate or interest rate margin reduction.
- **Loan Term Extension.** Modifications that include term extension (meaning extending the contractual date of the **last** installment for more than 2 years).
- **Split Balance.** Modifications that include debt segregation in two tranches:
  - the tranche which the debtor is able to repay, based on their current and estimated future repayment ability, and
  - the tranche which will be settled in the future through liquidation of collateral or any other kind of settlement which is agreed by both counterparties upon the initiation of the modification.
- **Partial Debt Forgiveness/Write-down.** Modifications that include partial debt forgiveness, so that the remaining debt amount may be normally repaid.
- **Operational Restructuring.** Modifications which include operational restructuring, rendering the institution viable and able to repay its debts. Restructuring may include change in management, sale of assets, cost reduction, corporate transformation, credit lines renewal or/and new lending.
- **Debt/ Equity Swaps.** Balance refers to the residual balance of the initial exposure and is filled-in with modifications that include exchange of debt with equity, so that the remaining debt amount may be normally repaid.

Long Term Modifications are offered for period longer than two years.

### C. Closure Actions

**Total Closure Actions.** No data shall be reported to this row as this shall be automatically filled-in with the sum of data reported in each type of closure action below.

- **Other Out-of-Court Settlements.** Closure actions including out-of-court actions that are not included in one of the following categories.
- **Voluntary Surrender.** Closure actions where the borrower cannot meet the terms of a loan collateralized with immovable property and voluntarily grants ownership of property to the credit institution (i.e. without the need for recourse to legal action on behalf of the credit institution). For the avoidance of doubt it is noted that the voluntary surrender may also refer to a property other than the one used as collateral. This closure action may refer to residential or commercial property.
- **Mortgage to Rent/Lease.** Closure actions where the borrower grants ownership of property to the credit institution and enters an operational / capital lease agreement which offers the ability to use the property for a certain period of time. This closure action may refer to residential or commercial property.
- **Voluntary Sale of Property.** Closure actions where the borrower voluntarily sells the collateralized immovable property to a third party with the consent of the credit institution. If the sale price is less than the amount of the exposure, the relevant agreement must clearly state how the remaining amount will be settled. This closure action may refer to residential or commercial property.
- **Settlement of Loans.** Closure actions which include an out-of-court settlement according to which the credit institution receives a single payment in cash (or cash equivalents) or a stream of predetermined payments. Under such closure action the credit institution may partially write-off the exposure.
- **Loan Sale.** Closure actions according to which the loan is sold to another credit or financial institution. Columns "Breakdown of Modifications & Closure Actions" shall not be completed as the exposure is no longer on the reporting institution's balance sheet.
- **Auction-Collateral Repossession.** Closure actions where the credit institution acquires ownership of the collateralized property through auction. For the avoidance of doubt it is noted that the repossession may also refer to a property other than the one used as collateral.
- **Auction-Collateral Liquidation.** Closure actions where the credit institution sells foreclosed property at auction and collects proceeds.
- **Under Legal Protection.** Closure actions which come as a result of a court decision, for example Bankruptcy Law, Law 4307/2014, Law 3869/2010 or Law 4605/2019. For the sake of clarity please note that, exposures for which debtors have an application for Legal Protection and for which a final court decision is pending are not be included in this category. Any forbore loans with a pending application for legal protection shall be reported based of the modification type applied prior to the application. For the sake of clarity please note that, any temporary modification, in the context of a temporary order for minimum payments during the procedure of accession to Law 3869/2010 or Law 4605/2019, is not considered as forbearance.

- **Debt Write-Off.** Closure actions resulting in total exposure write-off. Write off incurs after all out-of-court and judicial actions have been utilized and the debt is characterized as uncollectible. Columns “Breakdown of Modifications & Closure Actions” shall not be completed as the exposure is no longer on the reporting institution’s balance sheet.

## 2. Key Data for Template 6

The following columns shall be completed per type of modifications and closure action and category of exposure and repeated for every section/ groups of rows.

- **Breakdown of Modifications & Closure Actions.** This column shall be filled-in with the cumulative amounts of the following data:
  - **Balance.** The balance of the exposure which refers to on-balance sheet items at the reporting date shall be reported. For closure actions, the residual balance of the initial exposure after the closure action will be reported, analyzed in the relevant types.
    - ✓ **Performing.** Amount of performing exposures per type of modification shall be reported in this column (EBA, Annex V. Part 2. 213-239).
    - ✓ **Non-Performing.** Amount of non-performing exposures (EBA, Annex V. Part 2. 213-239) per type of modification shall be analyzed further in the following columns:
      - **UTP 0-30 dpd.** Subcategory of modified non-performing exposures with 0-30 dpd.
      - **UTP 31-90 dpd.** Subcategory of modified non-performing exposures with 31-90 dpd.
      - **NPE> 90dpd excluding denounced.** Subcategory of modified non-performing exposures with >90 dpd excluding denounced loans, which are presented separately.
      - **Denounced.** Subcategory of modified non-performing exposures which are denounced. Only Closure actions shall be filled-in in this category (Short-Term and Long-Term modifications are marked grey), which include cases where the residual balance of the loan remains denounced. It shall be reminded that for the purposes of our reporting, if a denounced loan is offered contractually agreed long term forbearance measures or closure actions rendering it viable, the remaining balance shall be transferred from “Denounced” to “Non-performing Forborne”. Henceforth, the loan will be monitored according to EBA (Annex V. Part 2. 240-268).
    - ✓ **of which to Idle Businesses.** Loans which relate to idle businesses shall be reported in this column. The term “Idle business” refers to businesses with no activity during the reference period, excluding businesses with seasonal activities. In any case businesses which have ceased any activity or are under bankruptcy process are considered idle. It should be clarified that businesses subject to article 99 of bankruptcy law (Law 3588/2007) are not necessarily considered as idle.
  - **Number of Loans.** The number of loans shall be reported.

Please note that the sum of forbore loans (i.e. the sum of exposures excluding forbore loans) should be equal to forbore loans in Template 1 (reported as “of which with Forbearance Measures”) per category of exposure and asset class.

- **Cash Recovery in the Quarter.** Cash recoveries include any collections of capital, interest or fees relating to the specific loans.
  - **of which Scheduled.** Cash recoveries expected (based on the repayment schedule) during the reference period shall be reported in this column.
  - **Actual.** No data shall be reported in this column as this shall be automatically filled-in with the data reported in the following columns
    - ✓ **From Performing.** Actual cash recoveries from performing exposures during the reference period shall be reported in this column.
    - ✓ **From Non-Performing.** Actual cash recoveries from non-performing exposures during the reference period shall be reported in this column.
- **Modifications and Closure Actions Performed in the Quarter.** Exposures which were modified during the reference period shall be reported in the respective columns:
  - **Balance.** The balance of exposures with modification or closure actions performed during the reference period. No data shall be completed to this column, as this shall be automatically filled-in with the data reported in the following columns, representing the pool of loans the modification comes from:
    - ✓ **A. From Performing Exposures.** Modifications from performing exposures shall be presented in this column (EBA, Annex V. Part 2. 213-239)
    - ✓ **B. From Unlikely to pay not past due or past due <90dpd.** Modifications from exposures unlikely to pay not past due or past due <90dpd (EBA, Annex V. Part 2. 236)
    - ✓ **C. From Exposures in arrears >90dpd excluding Denounced Loans.** Modifications from exposures in arrears >90dpd excluding Denounced Loans (EBA, Annex V. Part 2. 236)
    - ✓ **F. From Denounced Loans.** Modifications from denounced loans, as defined in Template 1, shall be reported. In the case of closure actions the residual balance of the loan shall be reported.
  - **Number of modifications:** The number of modifications refers to the number of solutions offered, approved, completed during the period, even when there is no residual balance (e.g. for closure actions).
    - ✓ **Completed.** Modifications and closure actions which were actually completed during the reference period shall be reported in this column. In the case where, the (re)modified loan includes additional loan facilities, the new (re)modified loan will be reported in this column.
      - **of which previously modified.** Total number of loans, of the above category that have been modified before (RoR), shall be presented in this column. In the case where, the remodified loan includes additional loan facilities, the new remodified loan will be reported in this column.

- **Balance Reduction.** The amount of balance reduction due to Long Term modification or closure action performed during the reference period shall be reported in this column. Amounts shall be reported with negative sign.
- **[of which Write-offs.** Write-offs during the reference period which are due to the modification or closure action shall be presented in this column. Amounts shall be reported with negative sign.

### **3. Asset classes**

Data of Template 6, data reported per exposure category in the respective columns, is further analyzed per asset class, according to Annex III of this Act, into repetitive groups of rows. More specifically, the total is split into three main asset classes (Residential, Consumer and Business Loans) and it is further split into subclasses for Business Loans. For the purposes of this Template, those subclasses are mutually exclusive. In that way the information reported for Business Loans arises from the respective aggregation of their subclasses.

**TOTAL.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum of the following subclasses.

**TOTAL Residential Loans.** In this section data on residential exposures, as defined for Template 1, shall be reported.

**TOTAL Consumer Loans.** In this section data on exposures to households for the coverage of consumer needs, as defined for Template 1, shall be reported.

**TOTAL Business Loans.** No data shall be reported to this section as this shall be automatically filled-in with the respective items (per line and column) of the four mutually exclusive loan portfolios mentioned below:

- **Small Business & Professionals- SBPs.** In this section data on exposures to professionals and businesses, as defined for Template 1, shall be reported.
- **Small & Medium Enterprises - SMEs.** In this section data on exposures to businesses, as defined for Template 1, shall be reported.
- **Corporate.** In this section data on exposures to businesses, as defined for Template 1, shall be reported.
- **Shipping Finance.** In this section data on exposures to shipping finance, as defined for Template 1, shall be reported.

## Template 7: Other Input Data

The purpose of this Template is to report additional data required so as to monitor the Banks' performance concerning key targets and Key Performance Indicators' set. The results are presented in tables "Actual Operational TARGETs and KPIs" and "Additional monitoring KPI". Template 7 is submitted on a solo basis per portfolio category. More specifically, the total is split into columns, into three main asset classes (Residential, Consumer and Business Loans) and it is further split into four subclasses for Business Loans.

### 1. Individual Input Data

#### *Sustainable solutions*

- **Distribution of NPV loss for ST Modifications:** Exposures with short-term modification measures completed during the reference period (as reflected at the end of the reference period and reported in Template 6), shall be allocated based on the percentage of the loss stemming from the subtraction of the NPV of cash flows expected based on the new arrangement from the NPV of expected cash flows under contractual obligations, before the changes in terms and conditions of the contract (initial NPV), over the initial NPV<sup>15</sup>. NPV calculation should use the original effective interest rate. For the purposes of our reporting, in the case where the original effective interest rate is not available, the pre-restructuring effective interest rate can be used. The exposures shall be allocated in the following buckets:
  - Exposure of Modifications with NPV gain
  - Exposure of Modifications with NPV loss up to 10%
  - Exposure of Modifications with NPV loss between 10% and 20%
  - Exposure of Modifications with NPV loss between 20% and 30%
  - Exposure of Modifications with NPV loss between 30% and 40%
  - Exposure of Modifications with NPV loss between 40% and 50%
  - Exposure of Modifications with NPV loss above 50%
- **Distribution of NPV loss for LT Modifications:** Exposures with long-term modification measures completed during the reference period (as reflected at the end of the reference period and reported in Template 6), shall be allocated based on the percentage of the loss stemming from the subtraction of the NPV of cash flows expected based on the new arrangement from the NPV of expected cash flows under contractual obligations, before the changes in terms and conditions of the contract (initial NPV), over the initial NPV<sup>1</sup>. NPV calculation should use the original effective interest rate. For the purposes of our reporting, in the case where the original effective interest rate is not available, the pre-restructuring effective interest rate can be used. The exposures shall be allocated in the following buckets:
  - Exposure of Modifications with NPV gain
  - Exposure of Modifications with NPV loss up to 10%
  - Exposure of Modifications with NPV loss between 10% and 20%

---

<sup>15</sup> The calculation of the loss is described in the EBA "Guidelines on the application of the definition of default under Article 178 of Regulation (EU) No 575/2013", in paragraph 51.  
<https://www.eba.europa.eu/documents/10180/1597103/Final+Report+on+Guidelines+on+default+definition+%28EBA-GL-2016-07%29.pdf/004d3356-a9dc-49d1-aab1-3591f4d42cbb>

- Exposure of Modifications with NPV loss between 20% and 30%
- Exposure of Modifications with NPV loss between 30% and 40%
- Exposure of Modifications with NPV loss between 40% and 50%
- Exposure of Modifications with NPV loss above 50%

### ***Action-oriented operational targets***

**Target 1: NPE Volume (Gross):** No data shall be reported in this row, as the row is filled-in based on data reported in Template 1 “Portfolio”. The following data shall be reported on NPEs:

- **Collateral Liquidation or Repossession.** The effect on debt from the liquidation or repossession of any kind of collateral (against the balance of the loan) shall be reported. No data shall be completed in this column as this shall be automatically filled-in based on data reported in Template 4.
  - **Collateral Liquidation.** The effect on debt from the liquidation of any kind of collateral (against the balance of the loan) shall be reported. No data shall be reported in this row, as it will be calculated as the difference between the previous row and the row below.
  - **Collateral Repossession.** The effect on debt from acquisition of non-cash collateral (against the balance of the loan) for which the credit institution or a group subsidiary has acquired ownership and has not yet sold it to a third party. Amounts shall be recorded with negative sign.

Please note that the amounts reported shall reconcile with the respective data reported in Template 6. The sum of “Collateral Liquidation” and “Collateral Repossession” shall also reconcile with the total “Collateral Liquidation or Repossession” reported in Template 4, per asset class.

- **Debt/ Equity swaps.** Transactions where debt (exposures) is exchanged for equity. Amounts shall be recorded with a negative sign.
- **Write-offs.** No data shall be completed in this column as this shall be automatically filled-in based on data reported in Template 4.
  - **Quarterly debt forgiveness.** This row shall be filled-in with write-offs for which the bank has made the decision to forfeit the legal claim on the debt. Amounts shall be recorded with a negative sign.
    - ✓ **Quarterly debt forgiveness covered by provisions.** The part of the exposures that were offered debt-forgiveness and were covered by provisions shall be reported in this row. Amounts shall be recorded with a negative sign.
    - ✓ **Quarterly debt forgiveness non-covered by provisions.** No data shall be reported in this row as it will be calculated as the difference of the rows above.
- **Quarterly other accounting (full or partial) write-offs.** This row shall be filled-in with write-offs other than debt forgiveness. No data shall be reported in this row as it will be calculated as the difference of the rows above. Please note that for the purposes of the current report, in consistency with template 4, any potential partial write-offs due to sales or collateral liquidation or repossession are not included in the current row.
  - ✓ **Quarterly other accounting (full or partial) write-offs covered by provisions.** The part of the exposures that were written-off and were covered by provisions shall be reported in this row. Amounts shall be recorded with a negative sign.

- ✓ **Quarterly other accounting (full or partial) write-offs non-covered by provisions.** No data shall be reported in this row as it will be calculated as the difference of the rows above.
- **Quarterly losses in sales of NPEs non-covered by provisions.** Losses incurred as a result of NPEs sale without being covered by provisions shall be reported in this row. Amounts shall be recorded with a negative sign.
- **Quarterly losses from other PE/NPE modification/resolution/closure measures.** All losses incurred as a result of modification measures or closure actions offered, shall be reported in this row, except for the losses in sales of NPEs that are report above. For the avoidance of doubt please note that quarterly debt forgiveness non-covered by provisions and other accounting (full or partial) write-offs non-covered by provisions are included in the current row. Amounts shall be recorded with a negative sign.

**Target 3: Cash recoveries (collections, liquidations and sales) from NPE / Total average NPE:** No data shall be reported in this row, as the row is filled-in based on data reported in Template 4 “Flows” and data reported below.

- **Cash Recoveries from NPEs within the Quarter:** Recoveries shall be filled-in with the data reported in the following categories, concerning collections from:
  - *Cash recoveries from collections of NPEs.*
  - *Cash recoveries from collateral liquidations of NPEs.*
  - *Cash recoveries from sales of NPEs.*
- **Quarterly cash recoveries from NPE, Interest Income.** Cash recoveries related to interest repayment shall be reported.
- **Quarterly cash recoveries from NPE, Capital & Fees.** Cash recoveries related to capital and fees repayment shall be reported.
- **Quarterly non cash Interest income (NPV unwinding & other).** Non-cash interest income such as unwinding impact shall be reported in this row.

**Target 7: Active NPE SMEs for which a viability analysis has been conducted in the last 12 months / Active NPE SMEs.** This ratio shall be reported only for SMEs. It is calculated as the balance of NPE for active SMEs for which a viability analysis has been conducted in the last 12 months over the total balance of NPE for active SMEs. For the sake of clarity, a business is considered as “Active” when it is not “Idle<sup>16</sup>”.

- **Exposure of Non Performing SMEs.** No data shall be reported in this row as it will be filled-in with data reported in Template 1 “Portfolio”.
  - **Active NPE SMEs.** No data shall be reported in this row as it will be calculated as the difference of total NPE SMEs to the Idle NPE SMEs.
    - ✓ **for which a viability assessment was conducted in the last 12 months.** The NPE balance of active SMEs for which a viability assessment was conducted in the last 12 months shall be reported in this row.

---

<sup>16</sup> The term “Idle business” refers to businesses with no activity during the reference period, excluding businesses with seasonal activities. In any case, businesses which are in a “state of inactiveness” or are under bankruptcy procedures are considered idle. For the sake of clarity, please note that businesses subject to article 99 of bankruptcy law (Law 3588/2007) are not necessarily considered as idle.

- **of which conducted in the quarter.** The NPE balance of active SMEs, for which a viability assessment was conducted during the reference period, shall be reported in this row.
- **Idle NPE SMEs.** The NPE balance of idle SMEs shall be reported in this row.
  - ✓ **of which assessed as idle in the quarter.** The balance of NPE of SMEs that were assessed as idle during the reference period shall be reported in this row.
- **Liquidated in the quarter:** The balance of those liquidated during the reference period shall be reported in this row.
- **Number of Non Performing SMEs.** No data shall be reported in this row as it will be filled-in with data reported in Template 1 “Portfolio”.
  - **Active NPE SMEs.** No data shall be reported in this row as it will be calculated as the difference of total NPE SMEs to the idle NPE SMEs.
    - ✓ **for which a viability assessment was conducted in the last 12 months.** The number of NPEs of active SMEs, for which a viability assessment was conducted in the last 12 months, shall be reported in this row.
      - **of which conducted in the quarter.** The number of NPEs of active SMEs, for which a viability assessment was conducted during the reference period shall be reported in this row
  - **Idle NPE SMEs.** The number of NPEs of idle SMEs shall be reported in this row.
    - ✓ **of which assessed as idle in the quarter.** The number of NPE of SMEs that were assessed as idle during the reference period shall be reported in this row.
  - **Liquidated in the quarter:** The number of loans of SMEs liquidated during the reference period shall be reported in this row.

**Target 8: SME and Corporate NPE common borrowers for which a common restructuring solution has been implemented.** Debtors are considered as common borrowers when they have exposures to multiple banks. No data shall be reported in this row as it will be filled-in with data reported below.

- **Exposure of NPEs with common borrowers (SMEs, Corporate, Shipping).** The balance of NPEs with common borrowers shall be reported in this row.
  - **With no engagement with other banks yet.** The balance of NPEs with common borrowers, for which there is no engagement with other banks, yet, shall be reported in this row. For the sake of clarity please note that, “engagement” refers to a formal cooperation amongst banks.
  - **With engagement with other banks started.** The balance of NPEs with common borrowers, for which there is an engagement with other banks, shall be reported in this row. The relevant balances shall be allocated to the following statuses:
    - ✓ **Decision pending**
    - ✓ **For which a common restructuring solution has been implemented**
    - ✓ **For which no agreement could be reached**
- **Number of NPEs with common borrowers (SMEs, Corporate, Shipping).** The number of NPEs with common borrowers shall be reported in this row.
  - **With no engagement with other banks yet.** The number of NPEs with common borrowers, for which there is no engagement with other banks yet, shall be reported in this row.

- **With engagement with other banks started.** The number of NPEs with common borrowers for which there is an engagement with other banks, shall be reported in this row. The relevant number shall be allocated to the following statuses:
  - ✓ **Decision pending**
  - ✓ **For which a common restructuring solution has been implemented**
  - ✓ **For which no agreement could be reached**

**Target 9: Corporate NPE for which the bank(s) have engaged a specialist for the implementation of a company restructuring plan.** No data shall be reported in this row as this will be filled in with data reported below.

- **Business NPE that have been handled based on Law 4307/2014 or Art. 99 and 106 of the Bankruptcy Code.** The balance of business loans handled based on Law 4307/2014 or Art. 99 and 106 of the Bankruptcy Code or Bankruptcy Law of another country shall be reported in this row.
- **Exposure of Corporate NPEs.** No data shall be reported in this row, as the row is filled in with data reported in Template 1 “Portfolio”.
  - **of which assessed as active.** The balance of NPEs for which a viability study was conducted and were assessed as active shall be reported in this row.
    - ✓ **for which a specialist has been engaged for the implementation of a company restructuring plan.** The balance of those assessed as active for which a specialist has been engaged for the implementation of a company restructuring plan shall be reported in this row.
- **Number of Corporate NPEs.** No data shall be reported in this row, as the row is filled in with data reported in Template 1 “Portfolio”.
  - **of which assessed as active.** The number of NPEs for which a viability study was conducted and were assessed as active shall be reported in this row.
    - ✓ **for which a specialist has been engaged for the implementation of a company restructuring plan.** The number of those assessed as active for which a specialist has been engaged for the implementation of a company restructuring plan shall be reported in this row.

### ***Process-related monitoring indicators***

- **Third Party's Portfolio under Management.** Data will be reported for loans to Greek residents (individuals or legal entities) for which the institution has undertaken the portfolio's management, whereas the ownership is retained by a third entity (headquartered in Greece or abroad) with no obligation to submit Template 8 of this report.
- **Cases of loans whose management has been assigned to a third party according to Law 4354/2015.** Data on on-balance sheet loans per portfolio type, which are managed by third parties according to Law 4354/2015, shall be reported in this row.
  - **Of which during the period.** Data on loans of the above category for which management has been assigned to a third party during the reference period shall be reported in this row.

## Template 8: Code of Conduct

The purpose of Template 8 is to report the course of actions taken by the institution subject to submission, in line with the Code of Conduct, as applicable. Data will be reported for on-balance sheet loans (under own ownership and subject to the Code of Conduct) of the institution subject to submission, on a solo basis. Template 8 shall be completed with values (amounts in thousands euro and number of units where appropriate). Data shall be reported for the total portfolio in aggregate. Portfolios of the institution subject to submission that have been transferred via securitization, for which the institutions' ownership is preserved, are included in the perimeter of Template 8. Nevertheless, portfolios that have been transferred via securitization, for which the institutions' ownership has been transferred to a third entity that doesn't have the obligation for submitting reports to Bank of Greece (e.g. headquartered abroad), the institution responsible for the management of the aforementioned portfolio will report the course of actions taken, in line with Code of Conduct, by submitting Template 8a.

### 1. Key Data for Template 8

For the purposes of Template 8 the following data shall be filled-in the following columns:

- **Number of loans.** Number of contracts must be reported in this column.
- **Gross Balance (€ thousand).** Total Balance of loans (excluding off-balance sheet items) at the reference date is reported in this column.
- **Number of borrowers.** The number of borrowers for the above mentioned loans shall be presented in this column unless instructed otherwise. In case there is more than one borrower for the same loan, the total number of borrowers shall be reported. Borrowers with more than one loan shall only be counted once. No data shall be completed in this column as this shall be automatically filled-in with the sum of the following columns:
  - **Individuals.** The number of borrowers who are individuals including professionals, for which the 2<sup>nd</sup> chapter of Code of Conduct applies, shall be reported in this column.
  - **Legal Entities.** The number of borrowers who are legal entities, for which the 3<sup>rd</sup> chapter of Code of Conduct applies, shall be reported in this column. Legal entities refer to very small businesses, as defined in Chapter 1, section B2 of the Code of Conduct.
- **Number of Guarantors.** The number of guarantors for the above mentioned loans shall be presented in segregated in the following columns:
  - **Individuals.** Number of individuals who act as guarantors for the following categories:
    - **Guarantors of individuals.** Number of individuals who act as guarantors for individuals' loans shall be reported in this column.
    - **Guarantors of Legal Entities.** Number of individuals who act as guarantors for legal entities' loans shall be reported in this column.
  - **Legal Entities.** Companies' which act as guarantors shall be reported in this column.
  - **Greek Government Guarantee.** The number of loans for which the Greek Government acts as a guarantor shall be reported in this column.

## 2. Data on Code of Conduct

- **Cases for which the 1<sup>st</sup> obligatory notice has been sent.** Data concerning on-balance sheet loans for which the 1st obligatory notice has been sent during the period from 1/1/2015 to the reference date, shall be reported. Only obligatory notices should be counted per loan, even if more notices have been sent. However, when more than one year has passed and the 1<sup>st</sup> obligatory notice has been sent twice for the same case, it shall be reported twice. Please note that for this row specifically, the “**Number of Guarantors**” shall refer to the number of individuals / entities for which a 1<sup>st</sup> separate obligatory notice has been sent.
- **Cases for which the 2<sup>nd</sup> notice has been sent.** Data concerning on-balance sheet loans, for which the 2nd notice has been sent during the period from 1/1/2015 to the reference date, shall be reported. When more than one year has passed and the 2<sup>nd</sup> obligatory notice has been sent twice for the same case, it shall be reported twice. Please note that for this row specifically, the “**Number of Guarantors**” shall refer to the number of individuals / entities for which a 2<sup>nd</sup> separate notice has been sent.
- **Cases that require the 1<sup>st</sup> obligatory notice during the period.** The row shall be completed with data concerning on-balance sheet loans that are eligible for the “1st obligatory notice”, as required by the Code of Conduct, during the reference period. Please note that cases which have required the “1st obligatory notice” during a prior period and still do so during the reference period are also included.
  - **of which over 90 dpd.** Data on the above mentioned loans which are over 90 dpd at the end of the reference period shall be reported in this row.
    - ✓ **For which the 1st obligatory notice has been sent.** Data on loans of the above category for which the 1st obligatory notice has been sent shall be reported in this row. Please note that for this row specifically, the “**Number of Guarantors**” shall refer to the number of individuals / entities for which a 1<sup>st</sup> separate obligatory notice has been sent.
- **Cases with submission of required information according to Code of Conduct.** Data on on-balance sheet loans for which the borrower has submitted the required information to the institution subject to submission, shall be reported. A loan shall be included when at least one co-borrower has received the 1st obligatory notice and has submitted the required information.
  - **of which during the period.** Data on loans for which the borrower has submitted the required information during the reference period.
- **Cases of borrowers with required information NOT Submitted within the provisioned time period of "cooperative borrower".** Data concerning data on on-balance sheet loans, for which borrowers did not submit the required information, shall be reported in this row. A loan shall be included when none of the co-borrowers has submitted the required information.
  - **of which during the period.** Data on loans of the above category, for which borrowers did not submit the required information during the reference period.
- **Final proposal for modification or closure action, according to Stage 4 of Code of Conduct.** Data on on-balance sheet loans for which there is a final proposal, by the institution subject to submission, for modification or closure actions, as presented on the official document required in Stage 4 of Code of Conduct, shall be presented in this row. Only one final proposal per loan subject to the Code of Conduct shall be reported. For the avoidance of doubt, please note that in the case of multiple proposals on behalf of the institution subject to submission (including following a counterproposal or an appeal), only the final proposal shall be reported. Additionally, if the final proposal includes alternative solutions that can be classified in more than one type of modification or closure action,

only the solution with the greater ranking shall be reported, according to the waterfall of Section IV in Annex I.

No data shall be completed in this row, as it shall be filled in by the data in following categories depending on the type of the final proposal:

- **Proposal for Short Term Modifications.** Proposal for Short Term Modifications as defined for Template 6 shall be reported.
- **Proposal for Long Term Modifications.** Proposal for Long Term Modifications as defined for Template 6 shall be reported.
- **Proposal for Closure Actions.** Proposal for Closure Actions as defined for Template 6 shall be reported.
- **Accepted proposal for modification or closure action, according to Code of Conduct.** Data on on-balance sheet loans that the borrower has accepted proposal and there is an agreement for modification or closure action among counterparties. No data shall be reported in this row as this shall be filled in by the data in following categories depending on the type of the modification:
  - ✓ **Short Term Modifications accepted.** Data on agreements which include Short Term Modification as defined for Template 6 shall be reported.
  - ✓ **Long Term Modifications accepted.** Data on agreements which include Long Term Modification as defined for Template 6 shall be reported
  - ✓ **Closure Actions accepted.** Data on agreements which include Closure Actions as defined for Template 6 shall be reported.  
Please be reminded that as clarified for Template 6, in the case of Long Term modification or Closure action due to which the balance of the loan is reduced, only the residual balance of the loan shall be reported.
- **of which to socially distressed borrowers.** Data on agreed modifications or closure actions with borrowers that belong to a socially distressed group shall be reported in this row.
- **of which with debtors with multiple creditors.** Data on agreed modifications or closure actions with borrowers that have loans with more than one creditor shall be reported in this row.
- **Cases for which no proposal for modification or closure action was accepted.** Data on on-balance sheet loans for which no agreement for modification / closure action could be reached after the final deadline, shall be reported in this row.
- **Cases of borrowers classified as "non-cooperative".** Data on on-balance sheet loans of borrowers classified as "non-cooperative" in the context of Code of Conduct shall be reported.
  - **Written notification sent to classified "non-cooperative" borrowers.** Data on on-balance sheet loans for which borrowers have been classified as non-cooperative and have also been sent a relevant notice shall be reported in this row. Please note that for this row specifically, the "Number of Guarantors" shall refer to the number of individuals / entities for which separate notice has been sent.
- **Appeal cases received.** Data on on-balance sheet loans for which the borrower has made an appeal against the Bank shall be reported.
  - **Of which accepted.** Data on loans for which the borrower has made an appeal which was accepted by the Bank, shall be reported in this row.
  - **Of which rejected.** Data on loans for which the borrower has made an appeal which was rejected by the bank, shall be reported in this row.

- **Cases of loans whose management has been assigned to a third party according to Law 4354/2015.**  
Data on on-balance sheet loans which are managed by third parties according to Law 4354/2015 shall be reported in this row.
  - **Of which during the period.** Data on loans of the above category of which management has been assigned to a third party during the reference period shall be reported in this row.

## Template 8a: Code of Conduct - Third Party's Portfolio under Management

The purpose of Template 8a is, for the institution subject to submission, to report the course of actions taken for third party's portfolio under management, in line with the Code of Conduct as applicable. Data will be reported for loans to Greek residents (individuals or legal entities) for which the institution subject to submission has undertaken the portfolio's management, whereas the ownership is retained by a third entity (headquartered in Greece or abroad) with no obligation to submit Template 8. Template 8a shall be completed on a solo basis, with values (amounts in thousands euro and number of units where appropriate). Data shall be reported for the total portfolio in aggregate.

### 1. Key Data for Template 8a

For the purposes of Template 8a the following data shall be filled-in the following columns:

- **Number of loans.** Number of contracts must be reported in this column.
- **Gross Balance (€ thousand).** Total Balance of loans at the reference date is reported in this column.
- **Number of borrowers.** The number of borrowers for the above mentioned loans shall be presented in this column unless instructed otherwise. In case there is more than one borrower for the same loan, the total number of borrowers shall be reported. Borrowers with more than one loan shall only be counted once. No data shall be completed in this column as this shall be automatically filled-in with the sum of the following columns:
  - **Individuals.** The number of borrowers who are individuals including professionals, for which the 2<sup>nd</sup> chapter of Code of Conduct applies, shall be reported in this column.
  - **Legal Entities.** The number of borrowers who are legal entities, for which the 3<sup>rd</sup> chapter of Code of Conduct applies, shall be reported in this column. Legal entities refer to very small businesses, as defined in Chapter 1, section B2 of the Code of Conduct.
- **Number of Guarantors.** The number of guarantors for the above mentioned loans shall be presented in segregated in the following columns:
  - **Individuals.** Number of individuals who act as guarantors for the following categories:
    - **Guarantors of Individuals.** Number of individuals who act as guarantors for individuals' loans shall be reported in this column.
    - **Guarantors of Legal Entities.** Number of individuals who act as guarantors for legal entities' loans shall be reported in this column.
  - **Legal Entities.** Companies' which act as guarantors shall be reported in this column.
  - **Greek Government Guarantee.** The number of loans for which the Greek Government acts as a guarantor shall be reported in this column.

### 2. Data on Code of Conduct

- **Cases for which the 1<sup>st</sup> obligatory notice has been sent.** Data concerning loans, under the management of the institution subject to submission, for which the 1st obligatory notice has been sent during the period from 1/1/2015 to the reference date, shall be reported. Only obligatory notices should be counted per loan, even if more notices have been sent. However, when more than one year

has passed and the 1<sup>st</sup> obligatory notice has been sent twice for the same case, it shall be reported twice. Please note that for this row specifically, the “**Number of Guarantors**” shall refer to the number of individuals / entities for which a 1<sup>st</sup> separate obligatory notice has been sent.

- **Cases for which the 2<sup>nd</sup> notice has been sent.** Data concerning loans, under the management of the institution subject to submission, for which the 2nd notice has been sent during the period from 1/1/2015 to the reference date, shall be reported. When more than one year has passed and the 2<sup>nd</sup> obligatory notice has been sent twice for the same case, it shall be reported twice. Please note that for this row specifically, the “**Number of Guarantors**” shall refer to the number of individuals / entities for which a 2<sup>nd</sup> separate notice has been sent.
- **Cases that require the 1<sup>st</sup> obligatory notice during the period.** The row shall be completed with data concerning loans, under the management of the institution subject to submission, that are eligible for the “1st obligatory notice”, as required by the Code of Conduct, during the reference period. Please note that cases which have required the “1st obligatory notice” during a prior period and still do so during the reference period are also included here.
  - **of which over 90 dpd.** Data on the above mentioned loans which are over 90 dpd at the end of the reference period shall be reported in this row.
    - ✓ **For which the 1st obligatory notice has been sent.** Data on loans of the above category for which the 1st obligatory notice has been sent shall be reported in this row. Please note that for this row specifically, the “**Number of Guarantors**” shall refer to the number of individuals / entities for which a 1<sup>st</sup> separate obligatory notice has been sent.
- **Cases with submission of required information according to Code of Conduct.** Data on loans, under the management of the institution subject to submission, for which the borrower has submitted the required information to the institution subject to submission, shall be reported. A loan shall be included when at least one co-borrower has submitted the required information.
  - **of which during the period.** Data on loans for which the borrower has submitted the required information during the reference period.
- **Cases of borrowers with required information NOT Submitted within the provisioned time period of "cooperative borrower".** Data concerning data on loans, under the management of the institution subject to submission, for which borrowers did not submit the required information, shall be reported in this row. A loan shall be included when none of the co-borrowers has submitted the required information.
  - **of which during the period.** Data on loans of the above category, for which borrowers did not submit the required information during the reference period.
- **Final proposal for modification or closure action, according to Stage 4 of Code of Conduct.** Data on loans, under the management of the institution subject to submission, for which there is a final proposal, by the institution subject to submission, for modification or closure actions, as presented on the official document required in Stage 4 of Code of Conduct, shall be presented in this row. Only one final proposal per loan subject to the Code of Conduct shall be reported. For the avoidance of doubt, please note that in the case of multiple proposals on behalf of the institution subject to submission (including following a counterproposal or an appeal), only the final proposal shall be reported. Additionally, if the final proposal includes alternative solutions that can be classified in more than one type of modification or closure action, only the solution with the greater ranking shall be reported, according to the waterfall of Section IV in Annex I.

No data shall be completed in this row, as it shall be filled in by the data in following categories depending on the type of the final proposal:

- **Proposal for Short Term Modifications.** Proposal for Short Term Modifications as defined for Template 6 shall be reported.
- **Proposal for Long Term Modifications.** Proposal for Long Term Modifications as defined for Template 6 shall be reported.
- **Proposal for Closure Actions.** Proposal for Closure Actions as defined for Template 6 shall be reported.
- **Accepted proposal for modification or closure action, according to Code of Conduct.** Data on loans, under the management of the institution subject to submission, for which the borrower has accepted a proposal and there is an agreement for modification or closure action among counterparties. No data shall be reported in this row as this shall be filled in by the data in following categories depending on the type of the modification:
  - ✓ **Short Term Modifications accepted.** Data on agreements which include Short Term Modification as defined for Template 6 shall be reported.
  - ✓ **Long Term Modifications accepted.** Data on agreements which include Long Term Modification as defined for Template 6 shall be reported
  - ✓ **Closure Actions accepted.** Data on agreements which include Closure Actions as defined for Template 6 shall be reported.  
Please be reminded that as clarified for Template 6, in the case of Long Term modification or Closure action due to which the balance of the loan is reduced, only the residual balance of the loan shall be reported.
  - **of which to socially distressed borrowers.** Data on agreed modifications or closure actions with borrowers that belong to a socially distressed group shall be reported in this row.
  - **of which with debtors with multiple creditors.** Data on agreed modifications or closure actions with borrowers that have loans with more than one creditor shall be reported in this row.
- **Cases for which no proposal for modification or closure action was accepted.** Data loans, under the management of the institution subject to submission, for which no agreement for modification / closure action could be reached after the final deadline, shall be reported in this row.
- **Cases of borrowers classified as "non-cooperative".** Data on loans, under the management of the institution subject to submission, of borrowers classified as "non-cooperative" in the context of Code of Conduct shall be reported.
  - **Written notification sent to classified "non-cooperative" borrowers.** Data on loans, under the management of the institution subject to submission, for which borrowers have been classified as non-cooperative and have also been sent a relevant notice shall be reported in this row. Please note that for this row specifically, the "Number of Guarantors" shall refer to the number of individuals / entities for which separate notice has been sent.
- **Appeal cases received.** Data on loans, under the management of the institution subject to submission, for which the borrower has made an appeal against the Bank, shall be reported.
  - **Of which accepted.** Data on loans for which the borrower has made an appeal which was accepted by the Bank, shall be reported in this row.
  - **Of which rejected.** Data on loans for which the borrower has made an appeal which was rejected by the bank, shall be reported in this row.

- **Cases of loans whose management has been assigned to a third party according to Law 4354/2015.**  
Data on loans, under the management of the institution subject to submission, which are managed by third parties according to Law 4354/2015, shall be reported in this row.
  - **Of which during the period.** Data on loans of the above category of which management has been assigned to a third party during the reference period shall be reported in this row.

## Template 9: Vintage Analysis

The purpose of this Template is to monitor the quality of restructuring solutions on NPEs, by examining the evolution of restructured exposures in a time period of 2 years. Data shall be reported for the total portfolio, for “Residential” and “Consumer” asset classes in aggregate, and for “Business” asset class.

### 1. Types of modification

Data in Template 9 are allocated in rows per type of short term and long term modification, according to the types of modification of Annex I of this Act. The types of modification are described in Template 6 and are shown below:

- **Total Short Term Modifications.** No data shall be reported to this row as this shall be automatically filled-in with the sum of data reported in each type of modification below.
  - **Arrears Capitalization.**
  - **Arrears Repayment Plan.**
  - **Reduced Payment Above IO.**
  - **Interest Only.**
  - **Reduced Payment Below IO.**
  - **Grace Period.**
- **Total Long Term Modifications.** No data shall be reported to this row as this shall be automatically filled-in with the sum of data reported in each type of modification below.
  - **Interest Rate Reduction.**
  - **Loan Term Extension.**
  - **Split Balance.**
  - **Partial Debt Forgiveness/Write-down.**
  - **Operational Restructuring.**
  - **Debt/ Equity Swaps.**

### 2. Key Data for Template 9

For the purposes of Template 9 the following data shall be filled-in the following columns:

- **Modifications Performed on NPEs in the respective Quarter (€ thousand).** Total end of quarter Balance of Non-Performing exposures (excluding off-balance sheet items), that were modified during the quarter, are presented in this column. The “respective” Quarter is the quarter mentioned in the title of the corresponding group of rows. For the avoidance of doubt, Non Performing exposures at the end of quarter, that were migrated to the NPE perimeter from Performing due to modifications performed in the quarter, are not included in the perimeter of the current template. In the case of (re)modifications where multiple loans (including at least one non-performing loan) are modified into one non-performing loan, the new modified loan will be included.

- **Re-Defaulted (%).** The ratio reported in this column is expressed as following: In the nominator, in the corresponding column that refers to the quarter of re-default, the reported exposures (included in the aforementioned perimeter) are those over 30 dpd at the end of the quarter or those that have been re-modified during the quarter, following their original modification (RoR). The denominator is the amount of total “Modifications performed on NPEs in the respective Quarter” (first column, as described above).

We note that, for the purposes of our reporting, the re-modified amounts (RoR) on a quarter will be also reported throughout the subsequent quarters (columns), whereas exposures that are over 30 dpd at the end of the quarter will be reported only in the respective quarter.

For the purposes of our reporting the amount of exposures that are over 30 dpd at the end of the quarter or are re-modified (RoR) will reflect the outstanding balance at the end of the quarter when the original modification occurred (reported in the first column, as described above), without taking into account any capitalized interests/fees or payments.

In the case where, the re-modified loan includes additional loan facilities, only the originally modified facility will be reported as “Re-Defaulted” and will be reported throughout the subsequent quarters, as mentioned above. Please note that the total amount of the new modification will start to be monitored at the respective quarter (group of rows) of the template.

The quarterly analysis consists of 8 consecutive quarters that are presented as columns: Q i.e. the current quarter, (Q-1) i.e. the previous quarter and (Q-2), (Q-3), (Q-4), (Q-5), (Q-6) and (Q-7) i.e. the past quarters respectively. For example, for the submission of 2016 Q4 (Q-7) represents 2015 Q1.

### 3. Modification Periods for Template 9

Data of Template 9, reported per type of modification in the respective rows, is presented into repetitive groups of rows according to the date of the modification. The analysis consists of 8 consecutive quarters: (Q-1) i.e. the previous quarter and (Q-2), (Q-3), (Q-4), (Q-5), (Q-6), (Q-7) and (Q-8) i.e. the past quarters respectively. For example, for the submission of 2016 Q4 (Q-8) represents 2014 Q4.

### 4. Asset Classes

Data of Template 9, is further analyzed into repetitive groups of rows. More specifically, the total is split into 2 main categories (Residential & Consumer and Business Loans). The information reported for Total Loans arises from the respective aggregation of the 2 categories.

**TOTAL.** No data shall be reported at this section of the Template, as this shall be automatically filled-in with the sum or sum-product of the following subclasses.

**Residential & Consumer Loans.** In this section data on residential exposures, as defined for Template 1 and data on exposures to households for the coverage of consumer needs, as defined for Template 1, shall be reported.

**TOTAL Business Loans.** In this section data on exposures to businesses, as defined for Template 1, shall be reported.

## Template 10: Auction procedures

Template 10 intends to capture the progress of auctioning processes that are led solely by the submitter (Credit institution) within the reporting period. Therefore, no data are included for auctions led by third parties (other credit institutions, public bodies, legal entities and individuals). Nevertheless, all auction proceedings led by the reporting entity shall be reported, irrespective of any security interest on the auctioned asset (i.e. assets not granted as collaterals). It should be noted that if more than one auction have been taken place for the same asset within the reference period (e.g. due to an unfruitful first auction), then they will be counted all times (both in number and value) and recorded respectively in various phases of the auctions. Template 10 is submitted on a solo basis. Amounts are presented in thousands of euro and the number in units for selected items.

### 1. Categories of Assets

For the purposes of Template 10, the following items are completed in the corresponding **columns**:

**Auction procedures:** Auction data (number and value) per asset are filled in. The first column of the template is not filled in as its contents result as the sum of the individual columns.

- **#:** The number of auctions per asset.
- **Value:** The first bid price<sup>17</sup> of the auctioned assets per asset.

Auction data (number and value) are broken down by asset type as analyzed below:

- **Residential immovable property.** Collaterals in the form of residential property (houses, apartments etc.) or with potential use in the future as such (unfinished residential property etc.) along with auxiliary spaces. Plots which are intended to be used for the construction of residential property are also included in this category (EBA, Annex V. Part 2. 173a).
- **Commercial & Industrial Real Estate.** Collaterals in the form of commercial or industrial property which can be used for business and/or investment purposes and belong to one of the following general categories based on their use: offices, stores, storage, industrial facilities, hotels, restaurants, theaters, other business use (parking, gas station, etc.) as well as the total of the subcategories which they include. – (EBA, Annex V. Part 2. 173b).
- **Other.** All other categories not included above (e.g. bonds, shares, equipment).

---

<sup>17</sup> It is clarified that especially in the rows “Award price” and “Collateral obtained by taking possession” the final price at which the asset auctioned is awarded to the highest bidder (instead of the first bid price) is reported.

## 2. Template 10 data

For the purposes of Template 10, the data (number and value of auctions) is broken down by category of asset (in columns) and per phase of the auction process (corresponding lines). The phases of the auction process are analyzed below:

- **Pending announced auctions at the beginning of period.** The assets of auctions that have been planned to be held since the start of the reference period and onwards, (all assets of published auctions in the Bulletin of Court Publications) shall be reported in this row. These auctions are reported irrespective of whether they are to be carried out within the reporting quarter or in a subsequent quarter.
  - **Of which: To be addressed during the period.** The assets of auctions which have been scheduled to be carried out within the reporting quarter (published in the Bulletin of Court publications) shall be reported in this row.
- **Auctions addressed during the period.** No data have to be filled in, as they are calculated as the sum of the elements of the individual lines ("Auctions canceled/suspended" plus "Auctions held"). It has to be noted that this row may include more than one auction (both in number and in value) for the same asset.
- ❖ **Auctions canceled/suspended.** Assets of auctions that had been scheduled to be carried out within the reference period but have been canceled or postponed for any reason (due to judicial intervention in court by the borrower, borrower's settlement with the debtor etc.) shall be reported in this row. It has to be noted that this row may include more than one auction (both in number and in value) for the same asset, due to the fact that auctions might either be deferred and then canceled or deferred more than once within the reporting period.
- ❖ **Auctions held.** This row refers to the assets of auctions that took place during the reference period and either ended up as "non-successful" or "successful". It is calculated as the sum of the elements of the individual rows analyzed below. It has to be noted that this row may include more than one auction (both in number and in value) for the same asset, due to the fact that auctions that took place without success, might be later (within the reporting period) re-conducted with successful results.
  - ✓ **Non successful auctions.** This row is filled in with the assets of unsuccessful auctions conducted within the quarter. It has to be noted that more than one unsuccessful auction (both in number and in value) for the same asset might be included.
  - ✓ **Successful auctions.** This row is filled in with the assets of successful auctions conducted within the quarter. It has to be noted that this row cannot include more than one auction (both in number and in value) for the same asset.
    - **Award price.** For successful auctions, this corresponds to the final value/price at which the asset was awarded to the highest bidder (instead of the starting bid price

that is reported on the other rows at the respective columns). The value/price is filled in the column "Value" of this row.

- **Collateral obtained by taking possession.** Collateral obtained by taking possession. It is filled in with the assets (number, value) that were acquired by the creditor entity leading the auction via the auction procedures (i.e. highest/successful bidder). It has to be noted that any assets that were acquired by the reporting creditor entity via the auction procedures, for which the auction was led by a third party, are excluded. Nevertheless, all assets obtained via auction proceedings led by the reporting entity shall be reported, irrespective of any security interest on the auctioned asset (i.e. assets not granted as collaterals). The final value at which the asset is awarded to the bidder, as in previous row, is reported in the "Value" column/position of this line.
- **Pending announced auctions at the end of period.** The assets of auctions that are scheduled to be carried out within the next quarters at the reference date (i.e. all auctions published in the Bulletin of Court Publications) shall be reported in this row (i.e. including auctions that were postponed during the period, that were unsuccessful and re-scheduled and also new scheduled auctions). Please note that this row should be aligned with the “**Pending announced auctions at the beginning of period**” row of the subsequent quarter’s report.

## Template 11: Collateral obtained by taking possession

The purpose of Template 11 is, for the institution subject to submission, to report information on collateral obtained by taking possession. This template shall be reported with values (amounts in thousands of euros and number of collateral instruments where appropriate) for the initial stock (at the beginning of the reporting period, i.e. the end of the last financial year) and the flows of collateral obtained by taking possession during the period until the reporting date. Further breakdowns on the type of foreclosed assets (rows) and the vintage (columns) shall also be reported. For the purposes of this reporting requirements, 'Collateral obtained by taking possession' shall also include assets that were not pledged by the debtor as collateral, but were obtained in exchange for the cancellation of debt, whether on a voluntary basis or as part of legal proceedings. Additionally and for the avoidance of doubt, please note that for Template 11 specifically "reporting period" or "reference period" refer to the period starting at the end of the last financial year.

Collateral obtained by taking possession could be classified as either:

- Property, Plant or Equipment ("PP&E") when they include tangible items that (i) are held by the bank for use in the production or supply of goods or services, for rental to others, or for administrative purposes and (ii) are expected to be used during more than one period,
- Other than Property, Plant and Equipment

For the purpose of this reporting, information is mainly requested (e.g. stock split by category) for collateral obtained by taking possession 'Other than classified as Property, Plant and Equipment'.

### 1. Category of Exposures

- **Debt balance reduction.** For the stock and the flows of collateral obtained by taking possession (monitored per rows), the following information should be reported for the instruments that were cancelled in exchange of the collateral obtained by taking possession.
  - **Gross carrying amount.** The gross amount of the debt that was cancelled in exchange of the collateral obtained by taking possession, at the exact moment of the exchange, through judicial procedures or bilateral agreement. Gross amount shall be considered as the gross reduction of the instrument balance, not taking into account any provisions. For the avoidance of doubt, balance reductions due to other reasons (e.g. cash collections) shall not be reported in this column.
  - **Accumulated Impairment, accumulated negative changes in fair value due to credit risk.** The accumulated impairment or the accumulated negative changes in fair value due to credit risk of the instrument that was cancelled in exchange of the collateral obtained by taking possession, at the exact moment of the exchange shall be reported in this column. The corresponding information shall be filled out with a negative sign.
- **A. Total collateral obtained by taking possession (B+C+D).** For the stock and the flows of collateral obtained by taking possession (monitored per rows), data for the value of collateral obtained by taking possession is requested per columns (also per vintage), as described below:
  - **Value at initial recognition.** The gross carrying amount of the collateral obtained by taking possession at initial recognition in the reporting institution's balance sheet shall be monitored in this column. No data shall be reported in this column (except for [r020, r200, r210]), as this shall be automatically filled-in with the sum of data reported in the respective columns [c050+c070+c090] according to vintages.

- **Carrying amount.** The carrying amount of the collateral obtained by taking possession in the reporting institution's balance sheet at the reporting reference date shall be monitored in this column. No value shall be reported in this column (except for [r020, r050, r070, r200, r210, r220]), as this shall be automatically filled-in with the sum of the values reported in the respective columns [c055+c075+c095] according to the time since recognition.
- **Accumulated (negative) changes.** The accumulated (negative) changes shall be the difference, at the level of the individual collateral item, between the value at initial recognition of the collateral and the carrying amount at the reporting reference date. 'Accumulated (negative) changes' aims at capturing, in a generic manner and independently from the type of collateral, the accumulated changes in the value of a collateral, since it was obtained by the institution. In this regard, 'accumulated (negative) changes' captures the net impact of changes in market prices, impairments and reversals of impairments, write-offs, depreciation and appreciation and change of accounting. The comparison between value at initial recognition and the carrying amount at the reference date shall be done for each collateral item separately. No value shall be reported in this column, as this shall be automatically filled-in with the sum of the values reported in the respective columns [c060+c080+c100].
- The columns "Value at initial recognition" and the "Accumulated (negative) changes" described above, shall also be reported per vintage of foreclosure:
  - **B. Foreclosed <=2 years.** Collaterals obtained by taking possession and recognized in the balance sheet since 2 years or less, at the reporting reference date.
  - **C. Foreclosed >2 years <=5 years.** Collaterals obtained by taking possession and recognized in the balance sheet for more than 2 years and up to 5 years, at the reporting reference date.
  - **D. Foreclosed >5 years.** Collaterals obtained by taking possession and recognized in the balance sheet for more than 5 years, at the reporting reference date.
- **Of which: Non-current assets held for sale.** Collateral obtained by taking possession that are under the classification of "Non-current assets held for sale" shall be reported in this section<sup>18</sup>.
  - **Value at initial recognition.** The gross carrying amount of the collateral obtained by taking possession at initial recognition in the reporting institution's balance sheet shall be monitored in this column.
  - **Carrying amount.** The carrying amount of the collateral obtained by taking possession in the reporting institution's balance sheet at the reporting reference date shall be monitored in this column.
  - **Accumulated negative changes.** Accumulated negative changes of the collateral obtained by taking possession. No value shall be reported in the column "Accumulated negative changes" [c120], as this shall be automatically filled-in.

---

<sup>18</sup> For non-current assets held for sale classification, as suggested by ECB NPL Guidance, foreclosed assets received shall be initially valued at the lower of:

- a) the amount of the financial assets applied, treating the asset foreclosed or received in payment of debt as collateral;
- b) the fair value of the repossessed asset, less selling costs.

For example, a mortgage of 100m€ with a provision of 30m€ is cancelled by taking the possession of the collateral. The collateral appraisal by a third party is 90m€. The institution recognizes the foreclosed asset in the balance sheet as Value at initial recognition for 70m€, which in this case is the minimum between a) 70m€ and b) 90m€.

## 2. Key data for Template 11

For the purposes of Template 11 with clear distinction to the respective columns per exposure category, the following data shall be filled-in concerning flows of collaterals by taking possession other than classified as PP&E:

- **Opening balance of collateral obtained by taking possession other than classified as Property Plant and Equipment (PP&E) - End of last financial year.** The stock of collateral obtained by taking possession that remained recognized in the balance sheet at the end of last financial year and that are not classified as PP&E shall be reported in this row.
  - **Inflows of Collateral obtained by taking possession other than classified as PP&E - since the end of last financial year.** All new collaterals that were obtained by taking possession during the reporting period (since the end of the last financial year) that are not classified as PP&E, including those not held by the institution at the reporting date (e.g. sold or converted within the period), shall be reported in this row.
  - **Outflows of Collateral obtained by taking possession other than classified as PP&E - since the end of last financial year.** All collaterals that are not classified as PP&E, that were either sold for cash or converted to financial instruments during the period (since the end of the last financial year), shall be reported in this row. These two mutually exclusive categories of outflows and their respective recoveries shall be separately reported in the following rows:
    - **Of which: Outflows for which cash was collected.** All collaterals (not classified as PP&E) that were sold with cash collection during the period (since the end of the last financial year) shall be reported in this row.
      - **For which: Cash collected net of costs.** Cash collected for the above mentioned collaterals that were sold during the period (since the end of the last financial year) shall be reported in this row. Cash collected shall be reported net of costs.
    - **Of which: Outflows with conversion to financial instruments.** All collaterals (not classified as PP&E) that were converted to financial instruments (i.e. the bank converts the asset back to a loan and finances it) during the period (since the end of the last financial year) shall be reported in this row.
      - **For which: Financing granted.** The gross carrying amount of the financial instruments to which the abovementioned collaterals were converted during the period (since the end of the last financial year), shall be reported in this row.

Please note that for the purposes of these reporting requirements, in cases where an outflow event would comprise both cash collected and conversion to financial instruments, “Value at initial recognition” and “Accumulated impairment, accumulated (negative) changes” shall be reported in both rows, with the amounts being split accordingly.

- **Closing Balance of collateral obtained by taking possession other than classified as Property Plant and Equipment (PP&E).** The stock of collaterals obtained by taking possession that remain recognised in the balance sheet at the reporting reference date and that are not classified as PP&E is reported in this row.

- **Profits/losses from sale of Collateral obtained by taking possession other than classified as Property Plant and Equipment (PP&E).** Gains / losses resulting from the sales of collateral during the period

For the purposes of Template 11 with clear distinction to the respective columns per exposure category, the following data shall be filled-in concerning the stock of collaterals by taking possession other than those classified as PP&E by type of collateral:

- **Collateral obtained by taking possession other than classified as Property Plant and Equipment (PP&E).** The stock of collaterals obtained by taking possession that remain recognized in the balance sheet at the reporting reference date and that are not classified as PP&E will automatically be reported in this row.. Collateral obtained by taking possession (other than PP&E) is monitored in rows, per type of collateral, as described below:
  - **Residential immovable property.** Collaterals obtained by taking possession in the form of residential property (e.g. houses, apartments etc.) or with potential use in the future as such (e.g. unfinished residential property etc.), along with auxiliary spaces.
    - **of which under construction / development.** Collaterals obtained by taking possession that are residential properties under construction or development.
  - **Commercial Immovable property.** Collaterals obtained by taking possession in the form of commercial or industrial property which can be used for business and/or investment purposes as well as any immovable property that is not a residential property, as described above. Land (both non-agricultural and agricultural) shall also be included in this category.
    - **Of which: under construction / development.** Subcategory of collaterals obtained by taking possession, which are commercial immovable property under construction or development.
    - **Of which: Land related to commercial real estate corporations (excluding agricultural land).** Collaterals obtained by taking possession in the form of land related to commercial real estate corporations (excluding agricultural land) will be separately reported in this row. This row shall, nevertheless, not be reported as it will be automatically derived from the sum of the following sub-categories:
      - **Of which: Land with planning permission for development.** Land obtained by taking possession with planning permission for development.
      - **Of which: Land without planning permission for development.** Land obtained by taking possession without planning permission for development.
    - **Movable property.** Collaterals obtained by taking possession in the form of property other than immovable shall be reported in this row.
    - **Equity and debt instruments.** Collaterals obtained by taking possession in the form of equity or debt instruments shall be reported in this row.
    - **Other.** Collaterals obtained by taking possession different from the categories described in the other rows.
  - **Number of Collateral obtained by taking possession other than classified as PP&E.** The number of collaterals obtained by taking possession that remain recognized in the balance sheet at the reporting reference date and that are not classified as PP&E shall be reported in this row.

For the purposes of Template 11 with clear distinction to the respective columns per exposure category, the following additional data shall be filled-in:

- **Collateral obtained by taking possession classified as PP&E.** The stock of collaterals obtained by taking possession that remain recognized in the balance sheet at the reporting reference date and that are classified as PP&E shall be reported in this row.
  - **Inflows of Collateral obtained by taking possession classified as PP&E - since the end of last financial year.** All new collaterals that were obtained by taking possession during the reporting period (since the end of the last financial year) and that are classified as PP&E shall be reported in this row.

## Template 12: Participation to Out-of-Court Workout (OCW)

The purpose of Template 12 is to depict the total participation of the reporting entity in the different stages of the out-of-court workout until the end of the reference period. The stages reported start upon receipt from the reporting entity of the relevant application for out-of-court workout. The template is filled-in with values (amounts in thousands euro and number of units where appropriate) for selected data per distinct stage of the process (in rows) allocated in the respective columns according to the type of the negotiation (bilateral or multilateral). Template 12 is submitted on a solo basis and in aggregation for the total portfolio.

### 1. Categories of Negotiations

The applications (i.e. negotiations), for the purposes of this Template, are split into the following categories:

- **Bilateral Applications.** It concerns applications that have been forwarded by the automated platform to the reporting entity for “bilateral negotiation”, following the coordinator’s completeness check of the supporting documents and the sending of a call for participation<sup>19</sup>.
  - #: The total number of bilateral applications shall be reported.
  - **Debt to reporting entity:** The total gross debt to the reporting entity included in bilateral applications shall be reported.
- **Multilateral Applications.** It concerns applications that have been forwarded by the automated platform to the reporting entity for “multilateral negotiation”, implying that the exposure of the debtor to the reporting entity or to any other debtor does not exceed the percentage of eighty five per cent (85%) of the total debtor’s exposures, as recorded in the platform of the out of court workout (OCW).
  - #: The total number of multilateral applications shall be reported.
  - **Debt to reporting entity:** The total gross debt to the reporting entity included in multilateral applications shall be reported.

### 2. Key data for Template 12

For template 12 and with clear distinction to the respective columns per category of negotiation (as analyzed above) the following data, which are mutually exclusive, shall be filled-in:

**OCW Applications Received.** The total number of bilateral and multilateral applications, in number and debt to reporting entity (with separation in the respective columns as analyzed above), that the reporting

---

<sup>19</sup> In multilateral applications the exposure of the debtor to the reporting entity must not exceed eighty five per cent (85%) of the total debtor’s exposures, as recorded in the platform of the out of court workout (OCW).

entity has received until the end of the reference period, within the context of the Out of Court Workout, shall be reported in this row.

- **Applications in progress – initial stage.** No data shall be reported in this row for the bilateral applications. For the multilateral applications, the row is calculated automatically as the difference between the total OCW Applications Received (in number and amount as analyzed above) and the sum of the rejected applications at initial stage (i.e. no quorum of creditors) and the applications being in progress (i.e. with quorum of creditors), as these are described below.
- **Rejected applications at initial stage (no quorum of creditors).** No data shall be reported in this row for the bilateral applications. For the multilateral applications, the number and the amount (in the appropriate columns as analyzed above) for the cases where no quorum of creditors has been reached since the notification of the coordinator's invitation, in the period defined by Law 4469/2017.
- **Applications in progress at initial stage (with quorum of creditors).** No data shall be reported in this row for the bilateral applications. For the multilateral applications, the number and the amount (in the appropriate columns as analyzed above) for the cases where the quorum of creditors has been reached, in the period defined by Law 4469/2017 since the notification of the coordinator's invitation, shall be reported. These applications will be examined at a later stage according to OCW procedures, in order for a restructuring solution to be accepted or rejected.
  - **Applications with pending decision.** This row shall monitor both bilateral and multilateral applications and refers to applications that have been received and are in progress (with quorum of creditors for the multilateral negotiations), but there is yet no final decision (approval or rejection) before the time limit set from the out of court workout framework has expired. The row is not filled-in, as it is automatically calculated as follows:
    - ✓ For bilateral applications: The row is derived as the difference between the total applications received (in number and amount in the appropriate columns as analyzed above) and the sum of the applications with approved final restructuring solution and the applications with rejected final restructuring solution, as analyzed below.
    - ✓ For multilateral applications: The row is derived as the difference between the total applications in progress at initial stage (with quorum of creditors) and the sum of the applications with approved final restructuring solution and the applications with rejected final restructuring solution, as analyzed below.
  - **Applications with approved final restructuring solution.** This row shall be completed for both bilateral and multilateral applications and refers to applications (in number and amount in the appropriate columns as analyzed above), for which a final restructuring solution has been agreed with the debtor.
  - **Applications with rejected final restructuring solution.** This row shall be completed for bilateral and multilateral applications. It concerns the applications (in number and amount in the appropriate columns as analyzed above), that for any reason (e.g. rejection from a creditor, rejection from a debtor, rejection due to insufficient data received etc.) did not result in a final restructuring solution. It is noted that this category also includes applications that

were in the stage of 'pending decision' (as analyzed above), for which the time limit set from the out of court workout framework has expired.

### **Actual Operational TARGETs and KPIs**

The table presents the actual operational targets and key performance indicators, for the reference period. No data shall be completed in this table as it shall be automatically filled-in based on all other templates. Data is presented per asset class split into separate columns (Residential, Consumer and Business Loans) and further to the four subcategories of Business Loans (SBPs, SMEs, Corporate and Shipping Finance).

### **Additional Monitoring Indicators**

The table presents the actual additional agreed monitoring indicators, for the reference period. No data shall be completed in this table as it shall be automatically filled-in based on all other templates. Data is presented per asset class split into separate columns (Residential, Consumer and Business Loans) and further to the four subcategories of Business Loans (SBPs, SMEs, Corporate and Shipping Finance).