



2010

**ANNUAL FINANCIAL REPORT**

(January 1st, 2010 – December 31st, 2010)

(TRANSLATED FROM THE GREEK ORIGINAL)

MARCH, 2011



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# 1. MANAGEMENT REPORT BY THE BOARD OF DIRECTORS

## MANAGEMENT REPORT BY THE BOARD OF DIRECTORS OF AGROTIKI INSURANCE SA FOR THE YEAR ENDED ON DECEMBER 31, 2010

### A. FINANCIAL INFORMATION

Agrotiki Insurance S.A. "The Company" consolidates with the method of full consolidation the company "ATE Insurance Romania SA" which is based in Bucharest, Romania and with the method of equity consolidation the companies ATE MUTUAL FUNDS and ATE SECURITIES based in Athens. The results of the two last participations were consolidated up until their date of sale (related reference is made further below).

- The consolidated pre-tax yearly results for 2010 amounted to € 7.5 million profits, against € 1.4 million loss of the corresponding last year's period.
- The income tax for 2010 amounted to € 6.9 million, the deferred tax (liability) amounted to € 3.1 million, thus forming the final results -including taxes- € 2.5 million loss, against € 5.1 million loss, of the previous 2009 period.

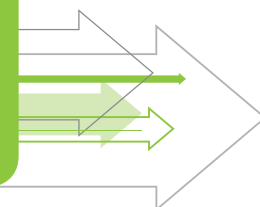
It should be noted that the results for 2010 have been charged additionally to those of the 2009 with the amount of € 14.6 million impairment of assets, which were consolidated into the "Trading Securities Portfolio (AFS)" category, after Management's decision. The impairment standard of the previously mentioned titles was the drop of the settlement price by above 20% from the acquisition price of the related securities or the drop of the purchase cost price for a continuous period of more than 24 months, following the related policy of Agrotiki Bank.

The Company's equity on December 31st 2010 amounted to € 21.5 million, compared to € 35.4 million on December 31st 2009, the Group's equity amounting to € 20.1 million compared to € 33.1 million respectively.

This decrease is mainly due to the drop of the current monetary value of the Company's investment securities, and particularly of those integrated into the "Available for Sale" portfolio, because of negative economic contingencies in the environment of Greece.

Specifically analyzing the key economic figures of the Company's results we have:

- The Accrued Written Premiums of the Company amounted to € 238.9 million, against € 211.3 million in the corresponding period last year, thus increasing by 13%. This is mainly due to the increase of non-life insurance production. They actually tally with € 53.6 million of life insurances (2009: 55.5 million) and € 185.3 million of non-life insurances (2009: € 155.8 million).
- Claims paid during 2010 amounted to € 124.6 million, compared to € 121.5 in the corresponding period last year.
- The Result from Insurance operations minus Operational Expenses amounted to € 58.6, against € 30.4 million in the previous year.
- Investment revenues reach the height of € 1.4 million, against € 16.0 million last year, while for the Group they reach the height of € 1.9 million, against € 16.8 million in the previous year. This is due to the impairment of value by € 14.6 million of the listed shares at the Athens Stock Exchange, and Mutual Funds integrated into the "Securities Available for Sale (AFS)", which has charged to the period's result.



They were also charged with the amount of € 2.2 million caused by the valuation of the commercial portfolio because of the stock markets' down cycle.

- Operating expenses over the examined period 2011 amounted to € 54.7 million, compared to € 52.5 million last year, while for the Group they amounted to € 55.4 million, compared to € 53.1 million in the previous year. The additional expenses which charged results compared to the previous year are: the DAF special levy based on the collective agreement by € 3 million and € 0.5 million because of increased contributions, staff redundancy payments € 4.3 million, € 1.3 million for accident care, which this year were deemed to indirect costs instead of direct costs like in the previous year, € 0.95 million for contribution fees to employees and several other charges on account of the obligation to adapt to SOLVENCY II € 0.35 million.
- The provisions which were charged amount to € 1.9 million consisting of provisions for bad debts € 1.7 million and retroactive staff payments € 0.2 million.
- Profits before Taxes came to € 7.3 million, compared to € 2.3 million loss in the previous year.
- Loss after tax amounted to € 2.7 million, compared to a loss of € 5.9 million in the previous year.
- Total taxes amounting to € 10 million are charges on results deriving from deferred taxes of € 3.1 million primarily on insurance provisions and income tax amounting to € 6.9 million.
- The Company's commitments in insurance investment and solvency margin are mentioned in notes 42 and 43 in Financial Statements. There are no other commitments or guarantees.

#### Main Indices

	GROUP		COMPANY	
	2010	2009	2010	2009
1 Operating expenses / Operating income	89.6%	103.1%	89.6%	103.4%
2 Receivables' collection Ratio	23% 84 days	24% 87 days	23% 84 days	24% 87 days
3 Claims paid / Net Written Premiums	59.3%	66.4%	59.3%	66.4%

## B. Important facts during year 2010 and their influence upon the annual financial statements.

Important facts that have taken place during the period of January 1, 2010 to December 31, 2010 and up to the compilation of the present report which have a positive or negative effect on the semi-annually financial statements, are the following:

- a) The board of Directors came to meeting on January 21st 2010 and in replacement of the resigned members Messrs. Andreas Grammatikos, Independent Member of the Board, Theodoros Koutsoumpas, Christos Tsitsiriggos and Sophocles Moullas, they elected Messrs. Ioannis Paggeios, Phillipos Samaras, Demetrios Damianos and Thomas Pliakos for the remaining term of office of the Board (7-5-2012).
- b) The Board of Directors during their meetings on March 1st 2010 and March 22nd 2010 decided the conveyance to AGROTIKI BANK S.A. (ATEbank) of the shares that the same possessed in the Group subsidiary companies, that is, of the following companies: 1. ATE Leasing (percentage 0.59%). 2. ATE Card (percentage 2.00%) 3. ATE Technical Information (percentage 10.34%) 4. ATE Funds

- (percentage 33.38%) 5. Atexcelixi (percentage 5.00%) 6. ATE Mutual Funds (percentage 46.00%) 7. ATE Advertising (percentage 12.70%).
- c) On March 30th 2010 ATEbank filed a conditional bid for 4,330,736 registered shares of AGROTIKI INSURANCE S.A., aiming to the acquisition of the total of the Company's voting shares.
- d) On April 22nd 2010 the allotment of the shares to ATEbank the Company possessed of the following subsidiary companies was completed: 1. ATE Leasing (percentage 0.59%). 2. ATE Card (percentage 2.00%) 3. ATE Technical Information (percentage 10.34%). The allotment of the shares of ATE Advertising (percentage 12.70%) was completed on April 27th 2010.
- e) On May 3rd 2010 the Company in accordance with article 15 of Law 3461 publicized a document which included the Reasoned Opinion of the Board regarding the conditional public bid from ATEbank to the shareholders of AGROTIKI INSURANCE S.A., as well as the Financial Advisor Report.
- f) On June 2nd 2010 the allotment of 33.38% of shares which the same possessed of the Group's subsidiary company, ATE Mutual Funds to ATEbank was completed.
- g) On June 23rd 2010, the Company's Board of Directors decided the allotment to ATE Leasing S.A. of the total of shares possessed, of the company ATE Rent INC (percentage 5.00%).
- h) On July 29th, 2010 the Company Board decided to transfer to ATE Leasing S.A. the total of shares possessed of the Company ATE Rent INC (percentage 5.00%).
- i) On August 9th 2010 the exercise of squeeze from ATEbank was completed, and therefore ATEbank possesses 27,318,347 common voting issue shares of the Company, which represent a percentage of 100% of the total paid-up share capital and the voting rights.
- j) The total result from the sale of the above mentioned Company shares to ATEbank amounted to € 0.3 million loss (before transfer duty).
- k) After the Administration's decision there was a change of category dated April 1st 2010 from the "Available for sale" portfolio (AFS) to the "Held to Maturity (HtM)" category of Greek government bonds (G.G.B.) of a nominal value of € 290 million.  
The reduced values of the above mentioned bonds formed on March 31st 2010 approximately amounted to € 35 million and will gradually be depreciated based on their "Holdings to Maturity" bonds of the Greek government (GGB) of a nominal value of € 290 million.
- l) After the Company's Management decision there was an impairment of shares listed on Athens Stock Exchange which were integrated in the AFS Portfolio, worth more than € 14.6 million. The impairment criterion of the aforesaid titles was the decline of the share's closing price by above 20% from the acquisition cost of the related securities or the decline of the purchase price cost for a continuous period of more than 24 months.
- m) The tax authorities have taken action to audit the open fiscal years 2008 and 2009, which however are still in progress. The Administration estimates that no further charge will occur for the Company, apart from the already formed provisions.
- n) The Solvency Capital Requirement (SCR) for December 31st 2010 amounts to € 49.4 million. The Company made use of article 21 of Law 3867/3.8.2009 which permits the calculation of solvency margin and insurance coverage placement, on the basis of the acquisition price of the Greek

State bonds and not with their current market value. The Company, taking into consideration the related provisions of the above mentioned law, sufficiently covers the demanded solvency margin on December 31st 2010. The Available Solvency Capital (ASC) as calculated by the Company for December 31st 2010 amounts to € 118.6 million.

- o) On October 8th 2010 the Securities' Commission, after the decision of the Board, approved the Company's request to exit the Athens Stock Exchange. ATEbank now possesses 100% of the Company's shares.
- p) During the second semester of 2010, 69 employees left the Company because of retirement, a fact that undoubtedly caused temporary problems to the Company; however efforts are being made for the continuation of the Company's smooth operation.
- q) Finally, a relative control is underway by the Administration of Private Insurance Supervision (A.P.I.S.) of the Bank of Greece (former EPEIA) for the control of Solvency, as well as the coverage and calculation of Company's insurance liability on December 31st, 2010. The Company has also been selected by the A.P.I.S. for the exercise of a special Stress Test, which will be completed within the first semester of 2011 in a total of four insurance companies in Greece.

### C. Perspectives – Activities during 2011

During the year 2011 the Company will be emphasizing on the improvement of the technical result along with profitability, by making interventions in the pricing policy without reducing the services provided. The takeover of 100% of the total paid-up share capital and the Company's voting rights from ATEbank signals a new era for the Company.

The new targets that will constitute AGROTIKI INSURANCE S.A. as one of the most powerful, reliable and competitive companies in the field, particularly now that its reliability is afflicted by the revocation of permissions of private insurance companies, as they have been stressed by the Company's Management during the Annual General Meeting of May 6th, 2010.

Amidst a particularly unfavorable environment in the market, which is created by the unprecedented economic crisis the country's economy is undergoing, but also in view of the distrustfulness and disorder the close of companies in the field has brought upon the present policyholders as well as the potentially eligible clients, AGROTIKI INSURANCE S.A. is called to further reinforce its presence, its credibility and its creditworthiness.

The Company Management's strategy and philosophy dictate the future business development with steady and careful steps, away from temporal moves, thus avoiding the addition of problematic portfolios.

Special emphasis is to be given on utilization of the co-operations with the network of the parent company ATEbank, the reduction of operating cost, the full reorganization in the level of sales' network, the task automation and the creation of new competitive products.

At the same time, the Company is preparing for its unimpeded transition to the status dictated by Solvency II, moving on to the necessary modernization operations of its structures and the reconstruction of its activities. For this purpose, the Company is planning to employ specialized personnel so as to

face the increased demands that have occurred and which will be created in the future.

Also, has been decided the conversion of the subsidiary company in Romania into a branch office, aiming at the return of the capitals that have been invested there. This is expected to be completed within 2011.

#### **D. Commentary of equity**

The Company's Equity covers (marginally) the minimum posed by Law 2190/1920, while there are no problems with the coverage of short-term Company Liabilities. In medium-term as well as long-term level, the examination of the height of Equity (and the potential need for capital increase) will take place after the completion of the control simulations (QIS) that SOLVENCY II implements, the Stress Test results and the decisions of the Bank of Greece concerning the coverage of solvency (SOLVENCY I) for the year 2011, the course of markets and following the related accounting treatment of the Greek State Bonds in case their current values remain in low levels.

As for the operation of the Greek Government Bonds, we would like to note that the calculation of the A.S.M. for December 2010 in the height of € 118.6 million has taken place by taking into consideration the favorable provisions of Law 3867/2010.

Without the use of these favorable provisions, the A.S.M. would fall short of the R.S.M. by € 58.3 million.

The Management considers the support of the parent company as a given in case an increase of its Equity is required, aiming at a smooth course and continuation of its activities for the realization of its goals.

#### **E. Main risks and uncertainties encountered**

The Company has been active in the insurance market for over 25 years, offering services in all sectors of private insurance. In the non-life insurance sector the Company maintains a controlled growth of its market share, while in the life insurance sector its market share remains stable. However, the social state's inability to adequately cover the needs of nursing and pension of its citizens has led to new dynamics and perspectives in the sector of life and health insurance. This is the sector that the main emphasis will be given to in the future years. For the year 2011, it is estimated that the income from insurance activities will be within the goal set in the Company's triennial business plan.

The Company, due to its operations, is exposed to financial risks arising from the changes in the securities' prices. To a large extent, investment income is formed by factors that the Company cannot influence, as they are linked to the developments of the state of the Greek economy, as well as the developments in the international financial markets. The evolutions in the financial markets in the year 2011 will also affect significantly the Company's income from investments, along with its Equity, because of the important part of the invest portfolio on bonds of the Greek government. The overall synthesis of the portfolio appears in detail in the notes on Financial Statements. The Company Administration, in accordance with related policies and instructions of the Agrotiki Bank Group, considers that the total of future cash flows of its bond portfolio will be fully collected and for this reason there has been no impairment provision for this. The greatest exposure of the Company to

credit risk because of the bond portfolio is mentioned in the category of Holdings to Maturity (HTM), which is not valued in current values and therefore differ from their accounting value on December 31st, 2010 by € 80.4 million.

The Company is also significantly exposed to other risks, such as cash flow, guarantee, currency and insurance risks, which however are being effectively dealt with in the ways described in the explanatory notes of the annual financial statements of December 31st, 2010. Consequently, no significant economic consequences are expected on the Profit & Loss Statement of the year 2011 due to the management of the aforementioned risks.

## F. Transactions with associated companies

The Company's transactions with associated companies during the year 2010 are analyzed as follows:

### Intercompany Transactions with associated Group companies

DESCRIPTION	RECEIVABLES	LIABILITIES	INCOME	EXPENSES
A ATEbank	72,854	-1,338	12,153	-6,551
B Other Companies of ATEbank Group	537	-371	2,483	-685
<b>ATE Insurance Consolidated Companies</b>				
C 1. ATE MUTUAL FUNDS S.A.	82	-29	299	
2. ATE Securities S.A.	-	-3	287	-39
3. ATE Insurance Romania S.A.	33		167	-32
<b>Total</b>	<b>73,506</b>	<b>-1,741</b>	<b>15,389</b>	<b>-7,307</b>

The Company's receivables from ATEbank mainly refer to balances from bank demand deposits and time deposits, as well as uncollected receivables from insurance contracts.

The Company's Income mentioned in the above table derives from insurance contracts' sales to other companies within the ATEbank Group, while the Expenses and Liabilities mentioned are due to the various supportive and promotional services that are offered by the Group's companies. An exception to this is the income earned by ATE Insurance Romania S.A., with derives from insurance and reinsurance premiums. All transactions between inter-related parties with ATEbank or other companies are made on the basis of usual business operations and are conducted on market terms and conditions.

The following companies of the ATEbank Group are considered to be the "associated companies": ATE Leasing, ATE MUTUAL FUNDS, ATE TECHNIKI-PLIROFORIKI S.A., ATE SECURITIES, HELLENIC SUGAR INDUSTRY, DODONI, SEKAP, ELVIZ, ATE ADVERTISING, ATE RENT, ATE EXCELIXI.

All Company's transactions with members of the Board of Directors and members of the Management are shown in the following table:

DESCRIPTION	GROUP		COMPANY	
	01/01- 31/12/2010	01/01- 31/12/2009	01/01- 31/12/2010	01/01- 31/12/2009
Compensations of Management	1,150	1,180	1,025	1,034
Receivables from executives and members of Management	101	81	101	81

The remunerations to members of the Management stated above refer to the remuneration of members of the Board of Directors and high-ranked administrative members.

The nature of transactions with the related parties does not differ from the previous year.

### G. Post balance sheet events

There are no significant Balance Sheet events that could have a significant impact on the Company's or the Consolidated Companies' annual financial statements.

N. Smyrni, March 29th 2011

FOR THE BOARD OF DIRECTORS

THE VICE-PRESIDENT OF THE BOARD OF DIRECTORS

**KONSTANTINOS FILIPPOU**

**To the shareholders of  
ATE INSURANCE A.E.**

## **Report on Separate and Consolidated Financial Statements**

We have audited the accompanying Separate and Consolidated Financial Statements of ATE INSURANCE A.E. (the "Company"), which comprise the separate and consolidated Statement of Financial Position as of December 31, 2010 and the separate and consolidated Statements of Comprehensive Income, Changes in Equity and Cash Flows for the year that ended, and a summary of significant accounting policies and other explanatory notes.

## **Management Responsibility for the Financial Statements**

The Management is responsible for the preparation and fair presentation of these Financial Statements in accordance with International Financial Reporting Standards as adopted by the European Union, as well as the internal control the Management defines as necessary so that the preparation and presentation of financial statements is free from material misstatements, whether due to fraud or error.

## **Auditor Responsibility**

Our responsibility is to express an opinion on these Separate and Consolidated Financial Statements, based on our audit. We have conducted our audit in accordance with the International Standards of Auditing. Those Standards require that we comply with ethical requirements, as well as plan and perform the audit so as to obtain reasonable assurance on whether the financial statements are free from material misstatements.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the risk assessment of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate under the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by the management, as well as evaluating the overall presentation of the financial statements.

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

## **Opinion**

In our opinion, the Financial Statements give a true and fair view of the separate and consolidated financial position of the AGROTIKI INSURANCE A.E. as of December 31 2010 and of its separate and consolidated financial performance, plus its separate and consolidated cash flows for the year that

ended, in accordance with International Financial Reporting Standards as adopted by the European Union.

### Report on Other Legal and Regulatory Requirements

We have verified that the contents of the Board of Directors' Report are consistent and correspond to the accompanying Financial Statements within the scope set by articles 37, 43a and 107 of C.L. 2190/1920.

Athens, April 8 2011

**KPMG Certified Auditors A.E.**

AM SOEL 114

**Michael Kokkinos, Certified Auditor Accountant**

AM SOEL 12701



**KPMG Certified Auditors A.E**

3, Stratigou Tombra Str  
153 42 Aghia Paraskevi  
Greece



## **AGROTIKI INSURANCE S.A.**

**SEPARATE AND CONSOLIDATED FINANCIAL STATEMENTS  
AS OF DECEMBER 31ST 2010**

**Based on the International Financial and Reporting Standards (I.F.R.S.)**

The attached Financial Statements have been approved by the Board of Directors of Agrotiki Insurance S.A. on March 29th 2011 and are available on the website address: <http://www.ateinsurance.gr>

163 SYNGROU AVE. – 171 21 N. SMYRNI  
Tel: +30 210 9379100  
NUMBER OF REGISTRATION OF INCORPORATED COMPANIES: 12821/05/B/86/1

# 3. ANNUAL FINANCIAL STATEMENTS

## ANNUAL COMPANY AND GROUP BALANCE SHEET

ASSETS	NOTES	GROUP		COMPANY	
		2010	2009	2010	2009
Cash and cash equivalents	19	84,263	89,768	77,298	83,420
Receivables from loans	20	7,018	7,865	7,018	7,865
Financial assets at fair value through results	21	3,846	5,950	3,846	5,950
Investment securities available for sale	22	107,106	345,213	107,106	345,213
Investment securities held to maturity	23	288,035	21,862	288,035	21,862
Investments for the benefit of insurance holders (Unit Linked)	24	23,447	26,230	23,447	26,230
Insurance receivables	25	59,953	56,235	59,836	56,168
Due from reinsurance activities	26	34,949	35,564	34,949	35,564
Participations in affiliated companies	27	-	10,381	8,272	19,036
Investment property	28	7,404	7,533	7,404	7,533
Tangible fixed assets	29	83,764	84,044	83,749	84,031
Deferred tax Receivables	30	10,078	21,008	10,087	21,008
Commissions and other deferred costs	31	18,146	18,533	18,117	18,533
Other assets	32	12,900	9,373	12,776	9,329
<b>Total Assets</b>		<b>740,909</b>	<b>739,559</b>	<b>741,940</b>	<b>741,742</b>
<b>LIABILITIES</b>					
Retirement benefit obligation	33	5,370	7,469	5,347	7,469
Obligations due to reinsurance activities	34	14,539	10,378	14,447	10,354
Other liabilities	35	36,631	30,209	36,514	30,133
<b>Total Other Liabilities</b>		<b>56,540</b>	<b>48,056</b>	<b>56,308</b>	<b>47,956</b>
Life Insurance mathematical reserves		250,432	269,304	250,426	269,304
Insurance provision for outstanding claims		247,690	227,408	247,632	227,365
Provisions for unearned premiums		80,767	76,716	80,764	76,716
Unit Linked Life Ins. Contracts	36	79,445	79,167	79,445	79,167
Other insurance provisions		5,891	5,793	5,891	5,793
<b>Total Insurance Provisions</b>	<b>37</b>	<b>664,225</b>	<b>658,388</b>	<b>664,158</b>	<b>658,345</b>
<b>EQUITY</b>					
Share Capital	38	40,978	40,978	40,978	40,978
Share Premiums	38	614	614	614	614
Accrued profits / losses		317	971	212	2,097
Other reserves	39	(21,802)	(9,483)	(20,330)	(8,248)
<b>Total</b>		<b>20,107</b>	<b>33,080</b>	<b>21,474</b>	<b>35,441</b>
Minority rights		37	35	-	-
<b>Total Equity</b>		<b>20,144</b>	<b>33,115</b>	<b>21,474</b>	<b>35,441</b>
<b>Total Liabilities and Equity</b>		<b>740,909</b>	<b>739,559</b>	<b>741,940</b>	<b>741,742</b>

CHAIRMAN  
OF THE BOARD

THEODOROS  
PANTALAKIS

VICE PRESIDENT

KONSTANTINOS  
PHILIPPOU

CHIEF FINANCIAL  
OFFICER

EVANGELOS  
ARCHONTOULIS

CHIEF ACCOUNTANT

ANTONIOS  
GOGONIS

ACTUARY

GEORGE  
KRAVVARITIS

The notes on pages from 19 to 87 form an integral part of the Annual Financial Statements.

## ANNUAL COMPANY AND GROUP INCOME STATEMENT

	NOTES	GROUP		COMPANY	
		2010	2009	2010	2009
Net written premiums and related income		239,391	211,356	238,907	211,315
Less: ceded premiums		(28,838)	(28,513)	(28,611)	(28,406)
<b>Net written premiums and related income</b>	<b>6</b>	<b>210,553</b>	<b>182,843</b>	<b>210,296</b>	<b>182,909</b>
Commissions paid	7	(26,398)	(23,061)	(26,461)	(23,221)
Claims Paid to policyholders (Retention)	8	(124,645)	(121,466)	(124,631)	(121,451)
Change of Insurance Provisions	9	(578)	(7,786)	(586)	(7,797)
<b>Insurance Operations' Results</b>		<b>58,932</b>	<b>30,530</b>	<b>58,618</b>	<b>30,440</b>
Net Interest Income	10	18,583	16,426	18,104	15,616
Fee and commission income	11	203	181	203	181
Gain / (losses) on financial transactions	12	(794)	1,193	(794)	1,194
Gain / (losses) on investment portfolio	13	(16,985)	(1,426)	(16,985)	(1,426)
Dividend income	14	903	439	903	439
<b>Total Investment Income</b>		<b>1,910</b>	<b>16,813</b>	<b>1,431</b>	<b>16,004</b>
Other operating income	15	2,042	3,731	1,999	3,731
Operating expenses	16	(55,427)	(53,096)	(54,732)	(52,456)
Income from associated companies		20	635	-	-
<b>Profit / (losses) before taxes</b>		<b>7,477</b>	<b>(1,387)</b>	<b>7,316</b>	<b>(2,281)</b>
Income tax	17	(9,984)	(3,692)	(9,977)	(3,652)
<b>(Losses) after taxes</b>		<b>(2,507)</b>	<b>(5,079)</b>	<b>(2,661)</b>	<b>(5,932)</b>
- Company shareholders		(2,509)	(5,080)	(2,661)	(5,932)
- Minority interest		2	1	-	-
Profits / (Losses) from evaluation / sale of "securities available for sale"		(3,478)	5,699	(3,478)	5,699
Tax attributable to differences recorded directly in equity		(7,828)	(1,581)	(7,828)	(1,581)
Foreign exchange differences		(237)	(180)	-	-
<b>Other comprehensive (expenses) / income after taxes</b>		<b>(11,543)</b>	<b>3,938</b>	<b>(11,306)</b>	<b>4,118</b>
<b>Total comprehensive income after taxes</b>		<b>(14,050)</b>	<b>(1,141)</b>	<b>(13,967)</b>	<b>(1,815)</b>
- Company Shareholders		(14,052)	(1,142)	(13,967)	(1,815)
- Minority interest		2	1	-	-
<b>(Losses) after tax per share</b>	<b>18</b>	<b>(0.0918)</b>	<b>(0.1859)</b>	<b>(0.0974)</b>	<b>(0.2172)</b>

The notes on pages from 19 to 87 form an integral part of the Annual Financial Statements.

## ANNUAL GROUP STATEMENT OF CHANGES IN EQUITY

## GROUP

	SHARE CAPITAL	SHARE PREMIUM	RESERVES	RETAINED EARNINGS (LOSSES)	MINORITY INTEREST	TOTAL EQUITY
<b>Balance as on January 1st 2009</b>	<b>40,978</b>	<b>614</b>	<b>(8,324)</b>	<b>953</b>	<b>35</b>	<b>34,256</b>
(Losses) for period 1/1/2009 - 31/12/2009	-	-	-	(5,079)	-	(5,079)
Profits from the valuation / sale of securities "available for sale"	-	-	5,699	-	-	5,699
Tax due to differences recorded directly in Equity	-	-	(1,581)	-	-	(1,581)
Other	-	-	31	(31)	-	-
Transfer of real estate revaluation reserve from own used for investment	-	-	(657)	657	-	-
Tax transfer on real estate revaluation from retained earnings (Note 39)	-	-	(4,471)	4,471	-	-
Foreign exchange differences	-	-	(180)	-	-	(180)
<b>Balance as on December 31st 2009</b>	<b>40,978</b>	<b>614</b>	<b>(9,483)</b>	<b>971</b>	<b>35</b>	<b>33,115</b>
<b>Balance as on January 1st 2010</b>	<b>40,978</b>	<b>614</b>	<b>(9,483)</b>	<b>971</b>	<b>35</b>	<b>33,115</b>
(Losses) for period 1/1/2010 - 31/12/2010	-	-	-	(2,507)	-	(2,507)
(Losses) from the valuation / sale of securities "available for sale"	-	-	(6,667)	-	-	(6,667)
Depreciation of accumulated losses from portfolio transfer	-	-	3,189	-	-	3,189
Tax due to differences recorded directly to Equity	-	-	(7,828)	-	-	(7,828)
Changes of interest in associated companies	-	-	-	1,077	-	1,077
Change in minority interests	-	-	-	-	2	2
Other transfers to Reserves	-	-	(776)	776	-	-
Foreign exchange differences	-	-	(237)	-	-	(237)
<b>Balance as on December 31st 2010</b>	<b>40,978</b>	<b>614</b>	<b>(21,802)</b>	<b>317</b>	<b>37</b>	<b>20,144</b>

The notes on pages from 19 to 87 form an integral part of the Annual Financial Statements.

## ANNUAL COMPANY STATEMENT OF CHANGES IN EQUITY

### COMPANY

	SHARE CAPITAL	SHARE PREMIUM	RESERVES	RETAINED EARNINGS / (LOSSES)	TOTAL EQUITY
<b>Balance as on January 1st 2009</b>	<b>40,978</b>	<b>614</b>	<b>(7,270)</b>	<b>2,934</b>	<b>37,256</b>
(Losses) for period 1/1/2009 – 31/12/2009	-	-	-	(5,932)	(5,932)
Profits from the valuation / sale of "available for sale" securities	-	-	5,699	-	5,699
Tax due to the differences recorded directly to own equity	-	-	(1,581)	-	(1,581)
Transfer of real estate revaluation reserve for own used for investment	-	-	(657)	657	-
Transfer of tax on real estate revaluation from retained earnings (Note 39)	-	-	(4,471)	4,471	-
Other	-	-	31	(31)	-
<b>Balance as on 31/12/2009</b>	<b>40,978</b>	<b>614</b>	<b>( 8,248)</b>	<b>2,097</b>	<b>35,441</b>
<b>Balance as on 1/1/2010</b>	<b>40,978</b>	<b>614</b>	<b>(8,248)</b>	<b>2,097</b>	<b>35,441</b>
(Losses) for period 1/1/2010 - 31/12/2010	-	-	-	(2,661)	(2,661)
(Losses) from the valuation of "available for sale securities"	-	-	(6,667)	-	(6,667)
Depreciation of aggregate losses from portfolio transfer	-	-	3,189	-	3,189
Tax due to the differences recorded directly to own equity	-	-	(7,828)	-	(7,828)
Other openings in Reserves	-	-	(776)	776	-
<b>Balance as on December 31st, 2010</b>	<b>40,978</b>	<b>614</b>	<b>(20,330)</b>	<b>212</b>	<b>21,474</b>

The notes on pages from 19 to 87 form an integral part of the Annual Financial Statements.

## ANNUAL COMPANY AND GROUP CASH FLOW STATEMENT

	NOTES	GROUP		COMPANY	
		2010	2009	2010	2009
Profit / (losses) before tax		7.477	(1.387)	7.316	(2.281)
<b>Plus / minus adjustments for:</b>					
Depreciation	29	824	377	814	366
Net cash from investment activity	12, 13, 14	16.876	232	16.876	232
Interest and related income	10	(18.976)	(16.795)	(18.344)	(15.866)
Interest and related expenses	10	240	369	240	250
		<b>6.441</b>	<b>(17.204)</b>	<b>6.902</b>	<b>(17.299)</b>
<b>Plus / minus adjustments for changes in operating capital accounts or accounts concerning operational activities:</b>					
(Increase) of receivables		(1.793)	(6.724)	(2.847)	(6.584)
Increase of liabilities (except liabilities to banks)		1.429	21.060	1.429	21.973
Increase of insurance provisions	37	8.620	22.490	8.596	22.462
(Decrease) / Increase Unit Linked	36	(2.783)	2.368	(2.783)	2.368
<b>Minus:</b>					
Income taxes paid		-	(951)	-	(951)
<b>Total cash inflow / outflow from operating activities</b>		<b>11.914</b>	<b>21.039</b>	<b>11.297</b>	<b>21.969</b>
<b>Investment Activities</b>					
(Purchase) / Sales of financial securities (stocks, securities)	22	(46.384)	(1.861)	(46.384)	(1.861)
(Purchase) / Sales of subsidiary and associated companies		10.382	-	10.764	-
Purchase of tangible assets	29	(544)	(4.398)	(532)	(4.396)
Interest revenue		17.615	10.358	16.983	9.429
Dividends received	14	903	439	903	439
<b>Total cash inflow / outflow from investing activities</b>		<b>(18.028)</b>	<b>4.538</b>	<b>(18.266)</b>	<b>3.611</b>
<b>Financial Activities</b>					
Collection of loans and advances		847	134	847	134
<b>Net cash inflow / outflow from financial activities</b>		<b>847</b>	<b>134</b>	<b>847</b>	<b>134</b>
<b>Net increase / (decrease) in cash and cash equivalents of the period</b>		<b>(5.268)</b>	<b>25.711</b>	<b>(6.122)</b>	<b>25.714</b>
Foreign Exchange differences	39	(237)	(180)	-	-
		(5.505)	25.531	(6.122)	25.714
<b>Cash and cash equivalents at the beginning of period</b>		<b>89.768</b>	<b>64.237</b>	<b>83.420</b>	<b>57.706</b>
<b>Cash and cash equivalents at the end of period</b>		<b>84.263</b>	<b>89.768</b>	<b>77.298</b>	<b>83.420</b>

The notes on pages from 19 to 87 form an integral part of the Annual Financial Statements.

## 1. GENERAL INFORMATION

AGROTIKI INSURANCE S.A. (“the Company”) was established in 1980 as “AGROTIKI GENERAL INSURANCE COMPANY S.A.”, trading as “AGROTIKI INSURANCE”.

The change in corporate name from “AGROTIKI GENERAL INSURANCE COMPANY S.A.” to “AGROTIKI INSURANCE S.A.” was decided at the Extraordinary General Meeting of shareholders on December 20, 2002, which approved the merger by absorption of “AGROTIKI LIFE & HEALTH INSURANCE S.A.” by “AGROTIKI GENERAL INSURANCE COMPANY S.A.”.

The company resulting from the merger by absorption of “AGROTIKI LIFE & HEALTH INSURANCE S.A.” by “AGROTIKI GENERAL INSURANCE COMPANY S.A.” has its registered offices in Nea Smyrni, at 163 Syngrou Ave., telephone number 210-9379100 and it is listed in the Companies’ Register under the number 12821/05/B/86/1. The company’s initial operating period is 100 years.

Since August 5, 2005 the Company uses the title “ATE Insurance” as a logo.

On December 31, 2010, the composition of the Board of Directors was as follows:

Chairman:	Th. Pantalakis
Vice-President:	K. Philippou
Managing Director	I. Hadjioussif
Members:	I. Papanikos, I. Paggeios, F. Samaras, G. Sykamias, D. Damianos, Th. Pliakos

The term of the Board of Directors expires on May 7, 2012.

The scope of the Company, pursuant to article 4 of its article of association is:

- a) To engage on own behalf or on behalf of third parties in the life and non-life insurance (insurance and reinsurance) in Greece and abroad in all branches cited and identified in Article 13 of LD 400/1970.
- b) To represent any Greek or foreign insurance or reinsurance company.
- c) To establish other insurance or reinsurance companies in Greece or abroad, regardless of legal form.
- d) To establish an Insurance Studies & Training Institution.
- e) To engage in activities related to the above, in Greece or abroad.
- f) To establish companies in Greece or abroad dealing with financial services or other companies, regardless of activity or legal form, and participate in similar companies even if their scope is not insurance activities, where this is permitted by present or future legislation.
- g) Any other related or not activity that is not prohibited by the existing legislation.

All the above activities may be carried out in partnership with third parties in Greece or abroad.

The Company is active in all modern branches of insurance, providing innovative and specialized plans ensuring complete insurance coverage both at individual and corporate level.

The Annual (Company’s and Consolidated) Financial Statement (“The Annual Financial Statement”) for the period ending on December 21, 2010, has been composed out of the company’s and subsidiaries’ own financial statements, as stated in Note 2.1.

The Annual Financial Statements of December 31, 2010 as well as the Annual Financial Information of December 31, 2010, are available on the web, at [www.ateinsurance.gr](http://www.ateinsurance.gr).

The Company and Consolidated annual Financial Statement has been approved by the Board of Directors for publication on March 29, 2011.

## Shareholders

The main Company's shareholders on 31/12/2010 were the following:

### 2010

SHAREHOLDERS	No OF SHARES	% PARTICIPATION
AGRICULTURAL BANK OF GREECE	27,318,347	100.00%
<b>TOTAL</b>	<b>27,318,347</b>	<b>100.00%</b>

### 2009

SHAREHOLDERS	No OF SHARES	% PARTICIPATION
AGRICULTURAL BANK OF GREECE	22,969,757	84.08%
A/K ATE DOMESTIC EQUITY MUTUAL FUND	543,196	1.99%
OTHER INVESTORS	3,805,394	13.93%
<b>TOTAL</b>	<b>27,318,347</b>	<b>100.00%</b>

After the Extraordinary General Meeting's decision, the Company has decided to exit the Stock Exchange of Athens. According to the Securities' Commission, the Company is already out of the Stock Exchange and all its shares now belong to the AGRICULTURAL BANK OF GREECE S.A., after a relative tender offer of shares.

## Regular Auditors

The auditing of the annual financial statements of the year 2009 of the Company and the consolidated Companies were conducted by:

KPMG Certified Auditors S.A. Accountant – Nr 3, Stratigou Tompra Str., Agia Paraskevi

## Tax Audits

The Company has been audited by the tax authorities, up to the year 2007; consequently, the pending fiscal years concern 2008, 2009 and 2010. The pending tax audits of 2008 and 2009 are underway.

## Pending Tax Audits in Group's Companies

The pending tax audits of the subsidiary ATE INSURANCE ROMANIA S.A. concern years 2007-2010.

## Others

- The accounting standards that the company adopts based on the International Financial Reporting Standards (IFRS), have been applied.
- The number of Company's employees at the end of the current period is 288 (2009: 376) and for the Group it is 305 (2009: 390).
- There are no liens on the Company's fixed assets. The properties which used to cover technical reserves are mentioned in Note 43.
- There are no differences under litigation or arbitration that might have any considerable effect on the financial position or operation of the Company.
- The Company's financial statements are included in the consolidated financial statements of the Agricultural Bank of Greece Group S.A., which is based in Greece and holds the percentage of 100% of share capital.

## 2. APPLIED ACCOUNTING PRINCIPLES

### 2.1 Presentation of the Financial Statements

The Company's financial statements are prepared in accordance with the International Financial Reporting Standard (IFRS), which have been issued by the International Accounting Standards' Board (I.A.S.B.) and the Interpretations which have been issued by the I.F.R.S. Interpretation Committee, as adopted by the European Union and applied on December 31, 2010. The Company's transition date to the I.F.R.S. is January 1st, 2004 and accordingly, its opening balance sheet as of this date was prepared in accordance with I.F.R.S. 1.

The impact on the structure of assets and the financial position of the Company during the transition from the Greek Accounting Standards according to the Greek company legislation, which was applied up until December 31st 2004, to the International Financial Reporting Standards (IFRS) , are shown in the published financial statements of the year ending December 31st, 2005.

The compilation of financial statements according to I.F.R.S requires the performance of estimates and adoption of concessions, which may affect the accounting balances of assets and liabilities, the required disclosures for contingent assets and liabilities on the date of compilation of the financial statements, as well as the amounts of income and expenses that were identified during the year. The usage of the available disclosure and the application of subjective judgment are integral parts for the performance of estimates. The actual future results may vary from the above mentioned estimations, while the deviations might have a significant impact upon the financial statements. These estimates and concessions are mentioned in Note 2.27.

The Consolidated Annual Financial Statements include the financial statements of the Company (AGROTIKI INSURANCE S.A.) and the companies ATE INSURANCE ROMANIA S.A. (method of full consolidation), as well as a portion of the results of companies ATE MUTUAL FUNDS and ATE AHEPEY (equity method) for the 5 first months of 2010 when the Company possessed a proportion (the buyout of these companies by AGROTIKI BANK OF GREECE S.A.) was completed

in June 2010). The consolidation of the aforesaid companies is illustrated under the indication "Group", while with the indication "Company" the Parent Company "AGROTIKI INSURANCE S.A." is mentioned.

The Financial Statements have been compiled under the historical cost principle, with the exception of securities available for sale, financial assets in fair value through results, investments on behalf of policyholders, investments in property and owner-occupied properties valued at fair value.

The amounts of Financial Statements are given in thousands of € , unless stated otherwise.

The accounting policies applied by the Company for the compilation of its Financial Statements on December 31st, 2010 are the same as the ones described in the published financial statements of the year ended on December 31st, 2009.

## 2.2 Transactions in Foreign Currencies

The functional currency of the Group and the Parent Company is Euro (€ ), with the exception of the subsidiary company ATE INSURANCE ROMANIA S.A., whose functional currency is the Romanian Lei (RON).

All transactions in foreign currency are converted into the functional currency according to the prevailing rate of exchange on the date of the transaction.

Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation of monetary assets and liabilities denominated in foreign currencies are recognized in the Income Statement.

Translation differences resulting from the settlement of debt securities and other monetary financial assets revaluated at fair value are included in the Income Statement.

Translation differences of non-monetary financial assets are a component of the change on their fair value.

Depending on the classification of a non-monetary financial asset, translation differences are either recognized on the Income Statement or within Shareholders' Equity, if non-monetary financial assets are classified as available for sale investment securities.

When preparing the financial statements, assets and liabilities of foreign entities are translated into Euros at the exchange rates prevailing at the balance sheet date, while income and expense terms are translated at average rates for the period.

Differences resulting from the use of closing and average exchange rates and from revaluing a foreign entity's opening net asset balance at closing rate are recorded directly in the "Foreign currency translation reserve" within Shareholders' Equity.

## 2.3 Goodwill and Consolidated Accounts

### Goodwill

All Asset accounts, liabilities and contingent liabilities that are acquired through a consolidation are accounted at their fair values on acquisition date. If the acquisition cost is greater than the fair value,

the difference is recorded in the Asset accounts as “Goodwill”.

If the acquisition cost is less than the fair value, the difference is recorded in the Income Statement.

### Subsidiaries

Subsidiaries are considered to be those Companies in which the Parent Company directly or indirectly has an interest of more than one half of the voting rights or otherwise has power to exercise control over their financial and operating policies. All subsidiaries have been fully consolidated. The Parent Company is obligated to consolidate all subsidiaries from the date on which effective control is acquired on them, while the obligation for consolidation ceases on the date that control is lost.

All intra-group transactions, balances and unrealized profits and losses on transactions between Group companies are eliminated on consolidation. Wherever necessary, accounting policies for subsidiaries have been modified, in order to ensure consistency with the policies adopted by the Company.

### Associated Companies

Associated Companies are considered to be the companies over which the Parent Company has between 20% and 50% of the voting rights and over which the Group exercises significant influence, but whom it does not control. Investments in associates are consolidated into the financial statements by applying the equity method of accounting. Goodwill arising on the acquisition of an associate is included in the acquisition cost of the investment. Impairment charges are recognized for other than temporary declines in value.

Under the equity method of accounting, the investment in associated companies is initially recorded at acquisition cost. The acquisition cost is increased or decreased by the proportionate share of the Group in the affiliate's profits or losses after the date of acquisition. Dividends received from the associate during the year reduce the carrying value of the investments.

Unrealized gains and losses on transactions between the Group and its associated companies are eliminated to the extent of the Group's interest in the associated company. Wherever necessary, the accounting policies used by the associate have been changed to ensure consistency with the policies adopted by the Group.

## 2.4 Investments in Financial Assets

The Company classifies its investments in financial assets as trade investments Held to Maturity and Available for Sale. Investments for policyholders are actually handled the same way as Investments in current value through results. The decision for the classification of the investments is taken on their acquisition.

Initially all investments are classified according to the transaction date and are evaluated at the acquisition cost, which is the fair value of the paid amount, including investment-related sale expenses, provided that investments available for sale or held to maturity assets are concerned. The investment expenses at fair value through income statement are not capitalized but are recognized in the income statement.

**Investments at fair value in Income Statement through Results:** these investments are acquired aiming at short-term profit and consist of shares, bonds, mutual funds' units. After their initial recognition, the reserved for sale investments are recorded at fair value. The gains and losses that occur from this evaluation are recorded in the Income Statement.

**Financial Assets Held to Maturity:** It involves financial assets with a fixed maturity date and fixed or determinable payments, which the company has the positive intention and ability to hold to maturity. Investments reserved until maturity are measured at amortized cost, implementing the effective interest rate method. Amortized cost is calculated by taking into consideration the surrender value and any, the premium or discount which may arise on the date of acquisition, less any provision for impairment.

**Investments Available for Sale:** It involves investments which might be held to maturity or be sold in order to cover liquidation needs or achieve earnings from a foreign currency interest rate fluctuation. After initial recognition, the investments classified as available for sale are recorded at fair value. The profits or losses that occur from the evaluation of the available for sale investments are taken to a separate account of net position until sale, receivables or provision of impairment, thus taken to the income statement.

**Derivative Financial Products:** Derivative products are used for hedging and are measured at present value. The Company uses derivative products listed in Athens Derivatives' Exchange and in foreign financial markets. The Company had no open positions on the closing date of the present Financial Statements. The Company does not follow Hedging Accounting.

**Investments on behalf of Policyholders:** They belong to the category "Investments at fair value through results" and they concern investments both in share or bond assets or even cash available valued in current value just like the corresponding liabilities to policyholders. The revenues and expenses occurring from the valuation of these assets are reconciled with these of liabilities so as to charge results in the net result concerning the Company's fee.

**Fair Value Estimation:** Investments traded in organized financial markets are measured at fair value which is determined according to current market capitalization value on the closing date of financial statements. Investments in unlisted securities are priced according to acquisition cost minus any depreciation.

All regular transactions for purchases and sales in financial assets are recorded on the trade date, which corresponds to the date on which the company is bound to acquire or sell the financial asset. The term "regular transactions of financial assets" requires the handing over of the financial asset to be completed within a fixed period, instituted by legislature or established by the usual market practices.

## 2.5 Tangible Assets

Tangible assets are used by the company either for operational business or administration purposes. Tangible assets include landed buildings, lease hold improvements, furniture and fixtures, vehicles and other equipment, as well as means of transport. Since December 31st 2008, the Company has changed its accounting practice and records all tangible assets in the fair value. Under the new established policy, the Company will re-evaluate its property fair value every three years, unless there is serious

indication of impairment in the meantime. The last evaluation of present value was conducted on December 31st, 2008 by an independent by real estate appraisal company (CBRE) and all differences were directly recorded to the fixed assets revaluation reserves (Note 39).

**Depreciations:** Land is not depreciated. The rest of the tangible assets are depreciated on a straight line bases over the useful life, which is annually re-estimated.

The useful life of tangible assets per category is as follows:

Land	-
Buildings	35 – 50 years
Other assets:	
- Furniture and fixtures	5 – 8 years
- Vehicles	7 – 9 years

“Improvements in third party property” are exempted and are depreciated within the minimum time period between the useful life improvement and the lease duration of the leased asset.

All other assets are recorded on acquisition cost less any depreciation.

Subsequent costs enhance the value of the asset or are recognized as a separate asset, only when it is likely to result in future economic benefits and costs may be measured reliably. Repairs and maintenance is charged to the profit and loss on the date of their implementation.

## 2.6 Investments in Fixed Assets

Investments in fixed assets include land and buildings owned by the Company for leasing or for acquiring capital gains and are classified as investment fixed assets. Investment fixed assets are initially recorded in acquisition value, which also includes acquisition costs. Starting from the year that ended on December 31st 2008 and after the change of the relevant policy, investment properties are valued annually at fair value.

After the initial registration of investment properties, they are valued at fair value as determined by independent valuers. The changes are recorded in the results.

The assets are recognized until the sale or earlier, on the date Company ceases to have future economic benefits from the asset. Any change of use such as private use of the asset, causes the transfer to the category of tangible assets. The gain or loss arising is recognized in the income statement.

## 2.7 Intangible Assets

Intangible assets mainly include software programs. The software acquired separately is capitalized at cost. Subsequently it is measured at cost less accumulated depreciation and impairment. Computer software is depreciated over three years. The Company’s management on an annual basis, re-estimates the value of intangible assets to determine any impairment or whether the estimated useful lives have changed. When the carrying value of an intangible asset exceeds its recoverable amount, an appropriate provision for impairment is conducted with an equal charge on the results. Intangible assets have been fully amortized in previous years, and thus are not presented to the Financial Statements.

## 2.8 Cash and Cash Equivalents

Cash and cash equivalents consist of monetary assets, having less than 3 month's maturity from the purchased date.

## 2.9 Receivables

Receivables are shown in the Statement of Financial Position net of provisions for doubtful debts.

The collectability of receivables is assessed on occasion that the company considers important. The evaluation is based on economic status, history of repayment by the debtor, probability of support from reputable credit-worthy guarantors and the realizable value of collateral.

The claims which are not considered important, as well as those which are, but without any impairment indications, are classified into groups with similar credit risk characteristics. The Company examines the possible prediction of every category's impairment. In evaluating each category, the number of under supervision and doubtful claims, the time period of claims in delay, their collectability once considered doubtful, the prevailing market conditions and the past experience referring to the amount of expected losses are considered.

When a receivable is characterized as doubtful, its book value is reduced to its estimated recoverable value, which is determined as the current value of expected future cash inflows, including estimated amounts recoverable from guarantees and tangible collateral, discounted at the real market rate.

Subsequent changes to the recoverable amounts and the time period within which to be collected are compared with previous estimates and in case of a difference in the estimate, an equivalent charge is recorded in the income statement.

Receivables and other loans when no longer able to be recovered are deleted by debiting the account of provisions for doubtful debts.

The Company accepts postdated checks from customers and associates for the processing of claims by insurance. Nevertheless, standing policy of the Company is reducing receivables from premiums and the payment of commissions only after the collection of the amount on checks. Thus, any recording of such checks in the Company's books is for information purposes only.

## 2.10 Leases

### The Company as a lessee:

#### Operating leases

The Company participates only in operating leases, where the lessor retains a significant portion of the risks and benefits derived from the leased assets. The costs of operating leases are recognized in income statement, using the standard method over the lease term.

## The Company as a lessor:

### Operating leases

The Company participates only in operating leases in which the lessor maintains an important proportion of the risks and benefits deriving from the leased assets. The leased assets are shown in the financial statements of the Company and are depreciated over the useful lives. Revenues from leases are recognized in the income statement under the accrual method, throughout the whole period of lease.

### 2.11 Counter Balance of Receivables – Liabilities

Offsetting financial assets with liabilities and display of the net amount in the Financial Statements is allowed only if there is a legal right to offset the registered amount and if there is intention of a net amount settlement obtained by netting or simultaneous settlement of both the total financial asset and liability.

### 2.12 Interest Income and Expenses

For all financial instruments, Income and Interest expenses are recorded in the income statement using the effective interest rate method.

The effective interest rate method is a method which estimates the net value of the asset or liability and distributes the revenue or interest expenses over the period.

Effective interest rate is the one which accurately discounts the estimated future payments or receivables during the expected period of the financial instrument.

Once a financial asset or group of similar financial assets are undervalued as a result of impairment, interest income is recognized by applying the interest rate used to discount future cash flows for the purpose of measuring the impairment loss.

### 2.13 Commissions and Related Income

Commissions and related income are recorded in the income statement during the period in which relevant services were provided. Commissions and related income derived from third parties' transactions are recognized in the statements on transaction completion. Fees over portfolio management and consulting services are classified in the statement according to the services' rendering contract, usually on a proportional bases.

### 2.14 Income Tax

Income tax is calculated over the fiscal year in relation to the taxation law and is recognized as an expense in the income statement. Tax losses carried forward to future years for balancing are recognized as assets when it seems possible that there will be a realization of future taxable profits, which will be sufficient to offset the accumulated tax losses.

Deferred income tax is calculated using the Balance Sheet method, based on temporary differences arising between assets' book value and liabilities in the Financial Statements and tax value attributed to them in accordance with tax policies in force.

To determine the deferred tax, the legislated tax rates expected to come in force in the period over which it is estimated that the liability or debt will be settled on a later date than the financial statement closing date. Any changes in tax rates after the date of the financial statements' balancing are not taken into consideration for the estimation of the deferred tax.

Current and deferred tax liability is recorded in income statement or directly in equity if it relates to items recognized directly in equity.

### **2.15 Provisions for Contingent Liabilities**

The Company in its financial statements recognizes provisions for the current obligations resulting from events that have happened and it is certain that the settlement will assume a payment which can be assessed reliably. Provisions for doubtful debts and disputed cases are reassessed and reviewed in every compilation date of financial statements based on the management's and its legal counselors' estimations. These provisions are reduced by amounts paid for the settlement of certain liabilities.

### **2.16 Employee Benefits**

The Company's obligation for employees' benefit from defined benefit plans is only limited to the program addressed by Law 2112/1920 which refers to the compensation to all employees on leaving the service due to retirement.

In a program of defined contributions, the Company is obliged to pay the determined levies to the insurance funds.

A defined benefits' plan is essentially determined as a pension plan in which the Company's obligation relies upon the size of compensation of the employee at retirement, based on age, years of service and salary. The obligation is recorded in the Balance Sheet regarding defined contribution plans, and comprises the present value of the defined benefit obligation on the retirement date at the balance sheet date minus the fair value of the plan assets, including any adjustments for unrecognized actuarial gains/losses, the cost of services rendered and past service cost. The assumed obligation for the defined contribution plans is annually determined by an independent actuary, using the projected unit credit method. The present value of the defined obligation then derives from the defined contribution plan is determined by the estimated future cash outflows, using interest rates of government securities, which have a duration matching that of the related liability.

Possible actuarial profits or losses resulting from readjustment, based on experience, as well as from accounting methods' changes are accordingly credited or debited in the income statement, in accordance with the average employment life. The Company follows the "Margin Method" of IAS 19 under which actuarial gains or losses resulting from adjustments based on historical data or a change of actuarial assumptions in excess of the amount of the accumulated liability are amortized as described above.

## 2.17 Termination of Financial Asset Representation in Financial Statements

A financial asset is not represented in the financial statements of the Company, since the Company ceases to be in control of the contractual rights which derive from the financial asset. The conventional rights' inspection ceases to exist either in the case of sale or when related cash inflows are transferred to an independent third party.

## 2.18 Financial Information per Activity Sector

The operational sector is the primary reporting format. The business sector is a group of assets and operations engaged in providing services which are subject to similar risks and attributes and differ from Company sectors.

The geographical sector of activity is the secondary reporting format, given that the Company operates primarily in Greece. The geographical segment provides information on the Company's activities in a particular economic environment subject to risks and attributes that vary from corresponding risks and attributes of other business and geographical segments.

The Company's operations are monitored in two key areas; Life insurance and Non – Life insurance which are divided into the segments of Motor Third Party Liability and Other Non-Life Sectors. The breakdown by business segment is shown in note 40.

## 2.19 Share Capital

Common shares are expenses in Equity. The mandatory redeemable preferred shares are classified in Liabilities. Direct expenses for the issuance of shares appear after deduction of the relevant income tax as a reduction in the proceeds. Direct expenses incurred for the issue of new shares for business acquisition are included in the acquisition cost in the acquired business.

## 2.20 Own Shares

The Company's own shares held by the company itself are recorded at their acquisition cost and are deducted from Equity until nullified. In the case of sale or reissuance, the receipt price will not be included in the income statement; instead it will directly be charged to Equity. As of December 31st 2010 and 2009 the Company does not possess own shares.

## 2.21 Insurance Contracts

As already mentioned, the company has adopted IFRS 4 since January 1st, 2004, when the contracts were classified into Insurance and Investment contracts and the adequacy of insurance provisions was evaluated.

In applying the provisions of IFRS 4, the Company conducted a separation of contracts into insurance contracts and financial contracts.

In cases where an insurance contract contains both insurance and financial risks, as in the case of Unit Linked contracts, the Company has not made the separation of their financial risk.

## A) Insurance Contracts

Insurance contracts are defined as those contracts in which the significant insurance risk at the inception of the contract is conveyed to the insurance Company, resulting in the Company's acceptance to compensate the insured party in case of defined negative accidental incidents, which affects negatively the insured party. The insurance risk is important only if an insured event could force the insurance company to pay significant additional benefits. The additional benefits refer to amounts to be reimbursed surpassing those in case of continuation of the insured risk.

A contract that exposes the insurance company to financial risk without significant insurance risk is not an insurance contract. Some contracts expose the Insurance Company to financial risk in addition to significant insurance risk.

The insurance contracts are classified into two categories depending on the nature of the insurance risk.

### 1. Life Insurance Contracts

Life Insurance contracts insure to a great extent events over a long time period. Related premiums are recognized as revenue, when they become payable by the policyholder. Premiums are shown without reducing because of proportional commissions.

#### 1.1 Traditional contracts

This category includes contracts issued by the Company to cover the risk of death whole life benefits, pensions, disability, accident and illness on both individual and group basis.

##### *1.1.1 Life Insurance Contracts with discretionary participation features in profits*

The bulk of traditional life insurance contracts incorporate discretionary participation features (DPF) as the policyholder is provided with additional benefits on top of those guaranteed by the contract at the discretion of the Company in conjunction with the terms of any contract and the investment performance of the Company, representing life insurance estimates.

##### *1.1.2 Life Insurance Contracts without discretionary participation features in profits*

There are life insurance contracts without features of discretionary participation on the amount of profits, which are not considered significant in relation to the total amount of all contracts.

#### 1.2 Life insurance contracts, where the insured parties bear the financial risk Unit Linked

Financial contracts are those which transfer the financial risk to the policyholder. The contracts transfer financial risk to the policyholders and at the same time the insurer retains a part of the financial risk by providing a partial guaranteed return. Apart from that, they contain significant insurance risk as well (death cover, disability, accident and illness).

The part of the contracts covering these risks is recognized as insurance contract. The part of the Unit Linked contract whose fair value of liability is determined by the unit net present value which represents the per unit fair value of the assets linked to the liability, multiplied by the number of units that are attributed to the contract holder on the date of the compilation of the Balance Sheet, is characterized as a Financial Contract.

## 2. Non-Life Insurance Contracts

### 2.1 Non-Life Insurance Contracts – Motor Third Party Liability

This category includes contracts issued by the company to cover motor third party liability.

### 2.2 Non-Life Insurance Contracts – Other Risks

This category includes policies covering the risk of fire, earthquake, vehicles, theft, transportation, general public liability, aid, marine, crews and others.

No embedded derivatives are included in these contracts.

Non-Life insurance contracts are recognized as revenue (written premiums), depending on the duration period of the insurance contract. On the date of the income statement the premium amount corresponding to subsequent years on a pro-rata basis over the related policy duration, is included in the unearned premium reserves. The premiums are reported before the deduction of the corresponding commissions.

## B) Investment Contracts

### 1. Deposit Administration Funds

This is the group policy by which an investment management insurance (Deposit Administration Funds) is agreed on, according to which the insured benefit is provided either on the -for any reason- departure of the insured member of the team from employment or on the completion of a certain age. In case of insufficiency in the account the insured member has no claim against the insurance company. The administration of the account is performed either by the insurance company by free will or with the guidance of the policyholder or the policyholder himself. The responsibility of the insurance company ends when the funds of the account are zeroed.

### 2. Contracts on behalf of life insured customers, in which the insured bear the financial risk (Unit Linked)

The Company, after a relevant separation characterizes as a financial contract a part of the contract where the fair value of obligation is determined by the current net unit price, which reflects the fair value per unit of assets associated with the obligation, multiplied by the total units assigned to the holder of the contract on the Balance Sheet date.

These contracts are embedded with derivative products built on additional sustainability benefits on maturity, while there are products for which there is an additional guarantee for a minimum return of 2.5% and 3% after ten years from the commencement of the contract.

### 2.22 Deferred Acquisition Costs (D.A.C.)

Commissions and other acquisition costs of both new and renewed contracts related to subsequent financial periods are reported in the Unit Linked account “Commissions and other future acquisition costs” and are distributed to the fiscal years according to the insurance contracts’ duration. For long-term life insurance the D.A.C. are depreciated based on the assumptions used to calculate the liability for future benefits of the contracts.

## 2.23 Insurance Provisions

Insurance provisions are the insurance company's net contractual obligations that are originated from the insurance contracts and are calculated in accordance with the applicable legislation.

The insurance provisions are analyzed in the following categories:

**Mathematical Provisions:** They contain the life insurance and capitalization of mathematical provision and are the difference created on the financial statement date between the present value of the cash obligations that the insurance company has taken up for every life insurance contract, including the discretionary participation profit reserve, and the net present value of the premiums owed by the policyholder which are payable to the insurance company in the future. The difference is calculated using the current actuarial methods.

**Unearned premiums Reserves:** They include the ratio of written premiums that relate to the future periods, for the contracts that are in force on the reporting date.

**Additional risk provision:** It is the additional provision which is formed on the date the financial statements are compiled, when the unearned premium reserve is not considered sufficient to cover the forecasted claims and expenses of contracts in force on that date.

**Outstanding claims' Reserves:** These are calculated on the reporting date of the financial statements' total cover of insurance risk liabilities, that have incurred before the balance sheet date, regardless of whether they have been reported or not, for which the equivalent claims have not been paid out or the exact amount has not been determined exactly or there is an uncertainty with regards to the level of liability of the insurance company. It contains the portfolio to portfolio provision as well as the provisions that occur with statistical or accounting methods. The amount of the reserves is calculated according to the available information on the reporting date such as experts' reports, doctors' reports and court rulings.

**Payable benefits:** These are insurance benefits that are owed to the policyholders and for various reasons they have not been paid off on the reporting date.

**Provisions for life insurance contracts for which the policyholder bears the financial risk:** These are the provisions intended to cover undertaken liabilities by the insurance company, which are connected to financial instruments within the frame of life insurances, whose value or proceeds are defined in coordination with investments, for which the policyholder bears the financial risk.

These provisions are related to policies that are directly attached to Assets (Unit Linked) where from the present value of these, there occur profits or losses on the valuation of Assets of the insurance company's Unit Linked, where they have a direct impact on the amount of insurance reserves. In such cases, the insurance company adjusts the insurance reserves by the same amount to the unrealized gains or losses on valuations and the resulting difference in insurance reserves is transferred to the relevant income account.

**Estimation of the insurance provisions:** it is performed on the date the financial statements are compiled, according to the principles and rules of each insurance risk. Law 400/1970 is used as the basis for the insurance provisions' calculation, as amended to date, in accordance with the transitional

regulations of IFRS 4 “Insurance Policies”. The balance in insurance provisions (increase / decrease) compared to the prior valuation is transferred to the income statement. As for the Company’s portion of insurance reserve account, the balance of which is transferred to the reinsurers according to the reinsurance treaties.

The final Outstanding Claims Reserve (O.C.R.) is calculated by the Responsible Actuary on the basis of estimates for the final cost expected to result in claims for insurance risks that have occurred until the date of the calculation of the reserve (regardless of whether they were reported to the Company or not) and until the final and definitive settlement of such claims. The above estimated cost includes claims paid and the direct and indirect settlement expenses.

On each reporting date a liabilities adequacy test is performed to ensure the adequacy adopted by IFRS 4 of the insurance reserves. In performing the test, current best estimates of future contractual cash flows claims’ handling and policy administration expenses are applied.

Any inadequacy in the results of the liability adequacy test according to the expected future cash flows, is immediately charged to the income statement.

## 2.24 Reinsurance Contracts

Part of the reserve attributable to the reinsurer of the Company is recognized in the asset account “Receivables from reinsurers”. All other Receivables and Payables represent the payable reinsurance premiums, as well as the proportion of the claims paid.

The Company reviews whether the receivables from the reinsurers have been impaired at the financial statement date and, if this is the case, whether it reduces their carrying value and recognizes the impairment loss in the income statement.

## 2.25 Embedded Derivatives

Embedded derivative products exist only in the Unit Linked financial contracts, as referred to in Note 2.21.

## 2.26 Earnings per Share

Earnings per share are calculated by dividing the Profit after tax by the weighted average of ordinary shares outstanding during the period.

## 2.27 Critical Accounting Estimates and Judgments in Applying Accounting Policies

The Company makes estimates and assumptions that affect the reported amounts of assets and liabilities of the subsequent year. These estimates and assumptions are evaluated constantly, based on history and previous experience as well as other factors, including anticipated events, which are considered to be reasonable under the circumstances.

### Insurance Contracts

The Company continues to apply the same accounting policies for the recognition and valuation of its liabilities arising from insurance contracts (including acquisition costs and related intangible insurance assets) and reinsurance contracts held. The Administration has applied its own judgment in order to create a set of accounting policies for the recognition and valuation of the liabilities and receivables from policies issued and reinsurance contracts held, in order to provide the most useful information for users of the Company's Financial Statements.

The insurance contracts are evaluated based on parameters prevailing at the time of their issue and all other factors mentioned above, and in accordance with applicable Insurance Legislation.

The estimate of the final liability resulting from damages covered by insurance policies is the most important accounting estimate of the Company. There are many sources of uncertainty that need to be taken into account in calculating the final liability of the Company in such cases. Regarding the audit of liabilities' adequacy from insurance policies as well as sensitivity examination of basic assumption, unit 4.2 is provided.

The Reserve of Outstanding Claims is continuously evaluated and it is revised at the end of each year. A provision is made for the estimated cost of all claims which are not final by deducting the amounts already paid, whether they relate to events that occurred during the year or in previous years and whether or not reported to the Company. Insurance claims are recognized as liabilities when there is sufficient evidence of their existence and their size can be calculated. If an existence of a liability is known, but there is uncertainty regarding the final amount, provision is made based on past experience on similar cases. Insurance claims may represent either a separate amount or a total liability on a category of business events.

### Impairment of Financial Assets

The Company verifies that the Equity securities available are impaired, when their fair value is for an extended period significantly below the acquisition cost. This verification requires the use of estimates. Among the factors taken into consideration in such estimations are the normal variation in the share price, the financial health of the issuing company, the returns of the industry, technological changes and financing cash flows.

The Company calculates on every financial statement date whether there is objective evidence that an investment title or any group of them has undergone impairment.

In the case of investment share titles that have been characterized as available for sale, the substantial of prolonged reduction in the security's fair value below cost is used to assess whether these assets have been impaired. During this year the Company has followed the new stricter practice of the parent company (AGRICULTURAL BANK OF GREECE S.A.) regarding the aforementioned criteria, which were determined at 20% related to the importance of reduction and a period of 24 months regarding the duration of reduction. In the case of bond titles that have been characterized as Available for Sale, the Company policy which is also in accordance with the Parent Company, mentions that the reduction of

fair value below its carrying value is not necessarily an impairment criterion. In this case the substantial increase of contingency or an official announcement that the debtor will go bankrupt or will carry out other economic restructuring are important objective evidence of impairment.

If there is such proof about assets available for sale, the cumulative damage (which is measured as the difference between cost and current fair value) is transferred from assets to results.

Impairment loss registered in results regarding share titles the impairment loss is not deemed in the results. If in a subsequent period the fair value of a security characterized as Available for Sale referring to bonds is increased and the increase may objectively be correlated with a fact that happened after the entry of impairment loss in the results, the impairment loss is deemed in results, or otherwise it is listed in Equity.

For financial assets in the categories Held to Maturity and Loans and Liabilities, which are estimated at amortized cost, the amount of loss and the value impairment is calculated as the difference between their accounting value and the current value of expected future cash flows, discounted at the initial real interest rate of the financial asset. The above related to bond portfolio is valid as indications for impairment.

### Impairment of Receivables

The Company forms provisions for impairment of value of receivables when there are reasonable indications that the collection of the total amount of receivables due – under the existing contracts – will not be collected. On the reporting date of the Statement Financial Position all doubtful and bad debts are revalued in order to determine the level of provision. No receivables are zeroed until all legal and practical measures for their collection are exhausted.

### Income Taxes

The provision for income taxes under IFRS 12 is calculated after the estimation of taxes to be paid to the tax authorities in the current year and in subsequent periods, and includes the current income tax for each year and the provision for deferred taxes. The final statement of income taxes may differ from the amounts that have been recorded in the Financial Statements.

## 2.28 New standards, standard amendments and interpretations

The present Financial Statements were compiled by fully implementing I.F.R.S., as well as the Interpretations and standard amendments that have been adopted by the European Union and whose implementation is mandatory for the compilation of financial statements.

## (A) Mandatory standards for the year December 31st 2010 that apply for the Company

### A1. New Accounting Standards, Amendments and Interpretations

Since no other reference is made, the following new standards or amendments do not have an important impact upon the Company's financial statements.

- IFRS 3 (Revised 2008) "Company Mergers"
- IAS 27 (Amended 2008) "Consolidated and separate Financial Statements"
- IFRS 1 (Revised 2008) "First IFRS application"
- IAS 39 (Amendment) "Financial Instruments: recognition and measurement"
- IFRIC 17 "Distribution of non-monetary financial assets to shareholders" (according to the adaptation by the EU, it applies for fiscal years that commence on or after July 1st, 2009).

### A2. Amendments in standards that are a part of the annual improvements' program for 2008 of the International Accounting Standards' Board (IASB):

The following amendments describe the most significant changes that come into force through IFRS as an effect of the results of the annual improvements' program of the IASB, published in 2008. These amendments are only valid for the current fiscal year. Also, since not mentioned otherwise, these amendments do not have a significant impact on the Company's financial statements.

- IFRS 5 "Non-current possessed Assets for Sale and Discontinued Operations"

### A3. Amendments in standards that are a part of the annual improvements' program for 2009 by the IASB.

The following amendments describe the most significant changes that come into force through IFRS as an effect of the results of the annual improvements' program of the IASB, published in 2009. These amendments are only valid for the current fiscal year. Also, since not mentioned otherwise, these amendments do not have a significant impact on the Company's financial statements.

- IFRS 2 (Amendment) "Benefits dependent upon the value of Shares" and IFRS 3 "Company Mergers"
- IAS 38 "Goodwill"
- IFRIC 9 "Counterbalance of Embedded Derivatives"
- IFRIC 16 – Hedges of a net investment in a foreign operation (according to the adoption by the EU, it applies for the fiscal years commencing on or after July 1st, 2009)
- IFRS 5 "Non-current Assets Held for Sale and Discontinued Operations"
- IFRS 8 "Operation sectors"
- IFRS 1 "Presentation of financial statements"
- IAS 7 "Monetary Flow statements"
- IAS 17 "Leases"
- IAS 36 "Impairment of Assets"
- IAS 39 Financial Instruments: Recognition and Measurement

#### **A4. Other amendments in standards (other than the aforementioned improvement programs):**

Since not mentioned otherwise, these amendments do not have a significant impact on the Company's financial statements.

- IFRS 1 (Amendment) "First IFRS implementation" (σχετικά με την παροχή επιπλέον εξαιρέσεων)
- IFRS 2 (Amendment) "Benefits dependent upon the value of Shares" (concerning the finalization of transactions in cash or shares in the personal financial statements.

### **B) Mandatory standards after the fiscal year of December 31st, 2010, likely to affect the Company**

#### **B1. The following amendments and revisions are not expected to significantly affect the Company's financial statements, unless stated otherwise**

- IAS 32 (Amendment) "Financial instruments: Presentation" (applicable for fiscal years beginning on or after February 1st, 2010)
- IFRIC 19 "Removal of financial liabilities with share titles" (applicable for fiscal years beginning on or after July 1st, 2010)
- IFRS 1 (Revised 2008) "First IFRS implementation" (applicable for fiscal years beginning on or after July 1st, 2010)
- IAS 24 (Amendment) "Related party disclosures" (applicable for fiscal years beginning on or after January 1st, 2011)

The present amendment attempts to reduce the transactions' disclosures among government-related entities and to clarify the notion of related entity. Particularly, the obligation of government-related entities to disclose the details of all transactions with the State and other government-related entities is revoked, it clarifies and simplifies the definition of related entity and implements the disclosure not only of the relation, transactions and others among the related parties, but also the disclosure of the commitments as far as both separate and consolidated financial statements are concerned. The Company will apply these changes as of the date on which they were implemented.

- IFRIC 14 (Amendment) "Limits of Defined Benefit Assets, Minimum Funding Requirements and their interaction: (applicable for fiscal years commencing on or after January 1st, 2011)

#### **B2. Amendments on standards consisting a part of the annual improvement program for year 2010 by IASB (International Accounting Standards' Board).**

The following amendments describe the most significant changes that are included in the IFRS as a result of the annual improvement program's results of the IASB, published in May 2010. The following amendments, unless stated otherwise, are valid for the fiscal years commencing after January 1st, 2010. Apart from that, they are not expected to significantly affect the Company's financial statements. These amendments have not yet been adopted by the EU.

- IFRS 3 “Company Mergers”: (applicable for fiscal years commencing on or after July 1st, 2010)
- IAS 27 “Consolidated and separate Financial Statements” : (applicable for fiscal years commencing on or after July 1st, 2010)
- IFRS 1 “First IFRS implementation” ” (applicable for fiscal years beginning on or after July 1st, 2010)
- IFRS 7 “Financial Instruments: Disclosures” (applicable for fiscal years commencing on or after January 1st, 2011). The amendments include several clarifications about disclosures of Financial Instruments.
- IAS 1 “Presentation of Financial Statements” (applicable for fiscal years commencing on or after January 1st, 2011). The amendment clarifies that entities may present the breakdown of the components of other total expenses either in the Statement of Changes in Equity or in the notes.
- IAS 34 “Intermediate Financial Report” (applicable for fiscal years commencing on or after January 1st, 2011)
- IFRIC 13 “Customer Loyalty Program” (applicable for fiscal years commencing on or after January 1st, 2011). The amendment clarifies the notion of the term “fair value”, in the frame of the measurement of rewarding customer loyalty programs.
- IFRS 9 “Financial Instruments”(applicable for fiscal years commencing on or after January 1st, 2013). IFRS 9 is the first part of the first phase in the works of IASB (International Accounting Standards’ Board) for the replacement of IAS 9 during 2010, so as to add new requirements for the classification and measurement of financial liabilities, the derecognition of financial instruments, the impairment and hedge accounting.

IFRS 9 provides that all financial assets are initially measured at fair value, plus particular transaction costs, in case a financial asset is not within the fair value through the results. The subsequent measurement of financial assets is carried out either in amortized cost or in fair value and depends upon the business model of the entity on the management of financial assets and contractual cash flows of the financial asset.

IFRS 9 prohibits reclassifications except in rare cases where the operational model of the entity changes and in this case the entity is required to reclassify affected financial assets. According to IFRS 9, all capital investments in share titles should be measured at fair value. Nevertheless, the administration has the choice to present revenues realized and unrealized gains and losses on fair value of equity securities not held for trading in the other comprehensive income. This determination is made at inception for each financial instrument individually and cannot be changed. Gains and losses on fair value are not transferred to the results later, while income from dividends will continue to be recognized in the results.

IFRS 9 removes the exemption from the measurement at cost for unlisted shares and derivatives on unlisted shares but provides guidance on when costs can be an appropriate estimate of fair value.

The Company is in the process of assessing the impact of IFRS 9 to the financial statements. IFRS 9 cannot be implemented earlier than the Company’s because it has not been adopted by the European Union. Only once approved will the Company decide whether to apply IFRS 9 earlier than January 1st, 2013.

### 3. LEGISLATIVE FRAMEWORK

AGROTIKI INSURANCE S.A. is subject to provisions of Codified Law 2190/1920 “On Corporate Companies”. Additionally, the Company is subject to the following specific provisions of Legislative Decree 400/1970 on “Private Insurance Enterprises” as in force following amendments made by:

- Law 2170/93 (Government Gazette 150/A)
- Presidential Decree 252/96 (Government Gazette 87/A) on compliance with the provisions of Directives 2/EC and 3/EC of Law 2496 (Government Gazette 87/A)
- Presidential Decree 159/1998 (Government Gazette 121/A) on compliance with the provisions of Directive 95/28/EC
- Law 2741/1999 (Government Gazette 199/A)
- Presidential Decree 169/2000 (Government Gazette 156/A) on adaptation of Directive 91/674/EEC transposed in Greek Law by Presidential Decree 148/1984 (Government Gazette 47/A) on the sectoral accounting plan for insurance undertakings as amended by Presidential Decree 64/1999 (Government Gazette 74/A).

The decisions of the Ministry of Development K3-3522/97, K3-1695/98, KE-3974, 3974/99 and K3-315, 6459, 9479/200 and K3-4383/07/06/2001 which in addition to regulating specific insurance related issues also stipulate an inspection of progress in settling outstanding claims, techniques, methods and mode of calculating technical reserves. In addition to the above, the decisions of the Private Insurance Supervisory Committee and 3/133/2008 154/5A/2008 also apply.

### 4. INSURANCE AND FINANCIAL RISK MANAGEMENT

IFRS 7 “Financial Instruments and Disclosures” introduces new disclosures for the purpose of improving the information provided, so as to assess the status of financial instruments for the Company’s financial position.

The note includes analyses for the report of the Company on each of the above risks and the policies and processes for measuring and managing risk. The risk management policies are examined periodically in order to incorporate changes that occur in market conditions and activities of the Company.

The supervision of compliance with policies and procedures for risk management has been assigned to the Company’s Board of Directors, which has the ultimate responsibility for managing the above risks, assisted by the Internal Audit, the Investment Committee and Actuarial Department, which report to the Board on a regular basis.

The Company is subject to financial and insurance risks. The Assets and Liabilities that are most exposed to these risks are:

## Financial Assets / Liabilities (including DAC and insurance provisions)

### GROUP

DESCRIPTION	2010		2009	
	ACCOUNTING VALUE	FAIR VALUE	ACCOUNTING VALUE	FAIR VALUE
<b>Valuation at amortized cost</b>				
Investment securities held to maturity	288,035	207,574	21,862	21,757
Cash and Cash Equivalents	84,263	84,263	89,768	89,768
Receivables from loans	7,018	7,018	7,865	7,865
Receivables from premiums	59,953	59,953	56,235	56,235
Receivables from reinsurers	34,949	34,949	35,564	35,564
Commissions and other deferred production costs (DAC)	18,146	18,146	18,533	18,533
Other assets	12,900	12,900	9,373	9,373
<b>Valuation at market value</b>				
Financial assets at fair value through profit	3,846	3,846	5,950	5,950
Financial instruments available for sale	107,106	107,106	345,213	345,213
Investments on behalf of policyholders (Unit Linked)	23,447	23,447	26,230	26,230
<b>Assets</b>	<b>639,663</b>	<b>559,202</b>	<b>616,593</b>	<b>616,488</b>
<b>Valuation at amortized cost</b>				
Liabilities to reinsurers	14,539	14,539	10,378	10,378
Other liabilities	36,631	36,631	30,209	30,209
Insurance provisions	584,780	584,780	579,220	579,220
Liabilities from investment insurance contracts (DAF)	55,998	55,998	52,937	52,937
<b>Valuation at market value</b>				
Liabilities from investment insurance contracts (U/L)	23,447	23,447	26,230	26,230
<b>Liabilities</b>	<b>715,395</b>	<b>715,395</b>	<b>698,974</b>	<b>698,974</b>

### COMPANY

DESCRIPTION	2010		2009	
	ACCOUNTING VALUE	FAIR VALUE	ACCOUNTING VALUE	FAIR VALUE
<b>Valuation at amortized cost</b>				
Investment securities held to maturity	288,035	207,574	21,862	21,757
Cash and cash equivalents	77,298	77,298	83,420	83,420
Liabilities from loans	7,018	7,018	7,865	7,865
Liabilities from premiums	59,836	59,836	56,168	56,168
Liabilities from reinsurers	34,949	34,949	35,564	35,564
Production supplies and other production costs deferred (DAC)	18,117	18,117	18,533	18,533
Other assets	12,776	12,776	9,329	9,329
<b>Valuation at market value</b>				
Financial assets at fair value through profit	3,846	3,846	5,950	5,950

DESCRIPTION	2010		2009	
	ACCOUNTING VALUE	FAIR VALUE	ACCOUNTING VALUE	FAIR VALUE
Financial instruments available for sale	107,106	107,106	345,213	345,213
Investments on behalf of policyholders (Unit Linked)	23,447	23,447	26,230	26,230
<b>Assets</b>	<b>632,428</b>	<b>551,967</b>	<b>610,134</b>	<b>610,029</b>
<b>Valuation at amortized cost</b>				
Liabilities to reinsurers	14,447	14,447	10,354	10,354
Other liabilities	36,514	36,514	30,133	30,133
Insurance provisions	584,713	584,713	579,178	579,178
Liabilities from investment insurance contracts (DAF)	55,998	55,998	52,937	52,937
<b>Valuation at market value</b>				
Liabilities from investment insurance contracts (U/L)	23,447	23,447	26,230	26,230
<b>Liabilities</b>	<b>715,119</b>	<b>715,119</b>	<b>698,832</b>	<b>698,832</b>

## 4.1. Financial Risk

The Company is exposed to financial risk through financial assets and liabilities, receivables from reinsurers and insurance reserves. The main components of financial risk are market risk, liquidity risk, exchange risk, interest rate risk, risk guarantees and credit risk.

### • Market Risk

Market risk refers to the probability of losses due to change in the level of volatility of market prices of stock prices, interest rates and exchange rates. The Company regularly evaluates the net current value of its portfolio and assesses the potential losses that might arise from exceptionally unusual financial changes.

### • Liquidity Risk

Liquidity risk related to the Company's ability to meet its financial obligations as they become due.

The monitoring of liquidity risk management focuses on the temporal correlation of the cash inflows and outflows, and aims to ensure sufficient cash for current transactions. For this purpose, the Company performs a liquidity gap analysis estimating the expected cash flows arising from the assets and liabilities items.

The following tables were based on residual maturity of assets and liabilities from the date of the compilation of the financial statements until their maturity date.

## GROUP LIQUIDITY RISK

DESCRIPTION	31/12/2010			31/12/2009		
	0 - 1 YEAR	1 - 5 YEARS	OVER 5 YEARS	0 - 1 YEAR	1 - 5 YEARS	OVER 5 YEARS
Cash and cash equivalents	84,263	-	-	84,263	89,768	-
Receivables from loans	0	-	7,018	7,018	-	7,865
Investment for the benefit of insurance holders	774	3,096	19,577	23,447	918	3,541
Total other receivables	99,021	26,927	-	125,948	94,097	25,608
Financial assets in their fair value through results	3,846	-	-	3,846	5,950	-
Investment securities available for sale	66,080	40,750	276	107,106	60,629	71,228
Investment securities held to maturity	10,000	52,605	225,430	288,035	-	21,862
<b>Assets</b>	<b>263,984</b>	<b>123,378</b>	<b>252,301</b>	<b>639,663</b>	<b>251,362</b>	<b>264,854</b>
Liabilities to reinsurers	14,539	-	-	14,539	10,378	-
Other liabilities	25,090	11,541	-	36,631	20,550	9,660
Insurance provisions	177,845	255,396	230,984	664,225	77,123	171,498
<b>Liabilities</b>	<b>217,474</b>	<b>266,937</b>	<b>230,984</b>	<b>715,395</b>	<b>108,051</b>	<b>409,766</b>
					<b>181,158</b>	<b>409,766</b>
						<b>698,974</b>

## COMPANY'S LIQUIDITY RISK

DESCRIPTION	31/12/2010			31/12/2009		
	0 - 1 YEAR	1 - 5 YEARS	OVER 5 YEARS	0 - 1 YEAR	1 - 5 YEARS	OVER 5 YEARS
Cash and cash equivalents	77,298	-	-	77,298	83,420	-
Receivables from loans	-	-	7,018	7,018	-	7,865
Investment for the benefit of insurance holders	774	3,096	19,577	23,447	918	3,541
Total other receivables	98,884	26,794	-	125,678	94,097	25,497
Financial assets in fair value through results	3,846	-	-	3,846	5,950	-
Investment securities available for sale	66,080	40,750	276	107,106	60,629	71,228
Investment securities held to maturity	10,000	52,605	225,430	288,035	-	21,862
<b>Assets</b>	<b>256,882</b>	<b>123,245</b>	<b>252,301</b>	<b>632,428</b>	<b>245,014</b>	<b>264,854</b>
Liabilities to reinsurers	14,447	-	-	14,447	10,354	-
Other liabilities	25,004	11,510	-	36,514	20,550	9,583
Insurance reserves and liabilities from financial contracts	177,778	255,396	230,984	664,158	77,123	171,498
<b>Liabilities</b>	<b>217,229</b>	<b>266,906</b>	<b>230,984</b>	<b>715,119</b>	<b>108,027</b>	<b>409,724</b>
					<b>181,081</b>	<b>409,724</b>
						<b>698,832</b>

## Foreign exchange risk

Foreign exchange risk does not materially affect the operations of the Company, taking into account the transactions with clients and suppliers in foreign currency are limited.

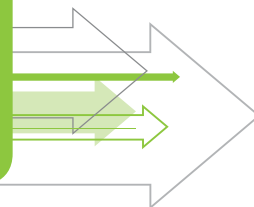
The following table summarizes the exposure of the Group and the Company's foreign exchange risk on December 31st, 2010.

### FOREIGN EXCHANGE RISK GROUP

DESCRIPTION	31/12/2010			31/12/2009		
	EUR	USD	GBP	EUR	USD	GBP
Cash and cash equivalents	83,233	391	639	84,263	-	600
Receivables from loans	7,018	-	-	7,018	-	-
Financial assets in fair value through results	3,846	-	-	3,846	-	-
Investment securities available for sale	107,106	-	-	107,106	206	-
Investments held to maturity	288,035	-	-	288,035	-	-
Investment for the benefit of insurance holders (Unit Linked)	23,447	-	-	23,447	-	-
Other assets	125,948	-	-	125,948	-	-
<b>Assets</b>	<b>638,633</b>	<b>391</b>	<b>639</b>	<b>639,663</b>	<b>206</b>	<b>600</b>
Liabilities to reinsurers	14,539	-	-	14,539	-	-
Other liabilities	36,631	-	-	36,631	-	-
Insurance provisions	664,225	-	-	664,225	-	-
<b>Liabilities</b>	<b>715,395</b>	<b>-</b>	<b>-</b>	<b>715,395</b>	<b>-</b>	<b>-</b>

### FOREIGN EXCHANGE RISK COMPANY

DESCRIPTION	31/12/2010			31/12/2009		
	EUR	USD	GBP	EUR	USD	GBP
Cash and cash equivalents	76,268	391	639	77,298	-	600
Receivables from loans	7,018	-	-	7,018	-	-
Financial assets in fair value through results	3,846	-	-	3,846	-	-
Investment securities available for sale	107,106	-	-	107,106	206	-
Investments held to maturity	288,035	-	-	288,035	-	-
Investments for the benefit of insurance holders (Unit Linked)	23,447	-	-	23,447	-	-
Other assets	125,678	-	-	125,678	-	-
<b>Assets</b>	<b>631,398</b>	<b>391</b>	<b>639</b>	<b>632,428</b>	<b>206</b>	<b>600</b>
Liabilities to reinsurers	14,447	-	-	14,447	-	-
Other liabilities	36,514	-	-	36,514	-	-
Insurance provisions	664,158	-	-	664,158	-	-
<b>Liabilities</b>	<b>715,119</b>	<b>-</b>	<b>-</b>	<b>715,119</b>	<b>-</b>	<b>-</b>



The balances of the Company's Assets and Liabilities on the table above are shown sorted by date. In cases where there is no contractual maturity date (open current account) or interest risk redefinition (cash deposits and savings) for the requirements and obligations, they are classified in the period up to a month.

The Company monitors the effects of risk rate by considering the duration of its portfolio of securities and related commitments in conjunction with developments in money markets. Company policy is to invest a substantial portion of portfolio in fixed rate bonds with a maturity corresponding relevant obligations.

#### Classification of Interest Bearing Financial Assets, Based on Interest Rate

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Fixed interest rate	310,162	300,637	310,162	290,637
Floating interest rate	103,301	88,894	96,336	82,548
Non-interest deposits	18,185	12,736	18,185	12,734
<b>Total</b>	<b>431,648</b>	<b>402,267</b>	<b>424,683</b>	<b>385,919</b>

#### Financial Assets' Analysis Based on Average Interest Rate for 2010

DESCRIPTION	COMPANY		
	0%-3%	ABOVE 3,01%	TOTAL
Bonds	-	330,367	330,367
Corporate bonds	10,000	-	10,000
<b>Total bonds</b>	<b>10,000</b>	<b>330,367</b>	<b>340,367</b>
Receivables from loans	7,018	-	7,018
Cash and cash equivalents	11,582	65,716	77,298
<b>Total</b>	<b>28,600</b>	<b>396,083</b>	<b>424,683</b>

#### Analysis of Treasury Financial Assets per Average Rate 2009

DESCRIPTION	COMPANY		
	0%-3%	ABOVE 3,01%	TOTAL
Bonds	-	282,564	282,564
Corporate Bonds	10,000	11,862	11,862
Foreign Corporate Bonds	-	208	208
<b>Total Bonds</b>	<b>10,000</b>	<b>294,634</b>	<b>294,634</b>
Receivables from loans	7,865	-	7,865
Cash and cash equivalents	83,420	-	83,420
<b>Total</b>	<b>101,285</b>	<b>294,634</b>	<b>385,919</b>

In order to manage the interest rate risk, the Company closely monitors the sensitivity of its financial assets and liabilities to interest rates' changes, adopting a parallel increase or decrease on the interest rates' curve by 100 basis points over a horizon of one month and 50 basis points for a time horizon of over one year. The portfolio is characterized symmetrical and so the change on the interest rate curve is equivalent.

#### SENSITIVITY ANALYSIS

	100 BASIS POINTS PARALLEL INCREASE	100 BASIS POINTS PARALLEL DECREASE	50 BASIS POINTS INCREASE AFTER 1 YEAR	50 BASIS POINTS DECREASE AFTER 1 YEAR
<b>31.12.2010</b>	(13,544)	13,544	(6,697)	6,697
<b>31.12.2009</b>	(12,983)	12,983	(6,427)	6,427

#### • GUARANTEE RISK

Due to the long-term coverage that the life insurance contracts offer, the interest rate plays a significant role in the calculation of the premiums. The interest rate that is used in these calculations is referred to as technical interest rate. An inappropriate choice in the technical interest rate is a factor which may lead to a surplus or deficit of the mathematical reserve.

The amount of guaranteed technical interest rate is taken into account in pricing, so the Company can mitigate that risk.

The Company also guarantees to cover the risk through the investment of choice in placements with high yields.

#### • CREDIT RISK

The Company is exposed to credit risk, which is the risk when a counter party is not able to meet their obligations when they become due. Reinsurers who may not be able to cover their share of insurance liabilities or of the insurance claims already paid to policyholders. Other counterparties contributing to the credit risk are policyholders who do not pay the premiums due and the Company's counterparties (insurers, agents, brokers and others). The Company reviews the credit limits of the counterparties on a regular basis and takes actions accordingly.

The carrying value of financial assets represents the maximum exposure to credit risk. The financial data with maximum exposure to credit risk on the balance sheet date were:

## CREDIT RISK EXPOSURE

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Cash and cash equivalents	84,263	89,768	77,298	83,420
Receivables from loans	7,018	7,865	7,018	7,865
Financial assets in fair value through results	3,846	5,950	3,846	5,950
Investment securities available for sale	107,106	345,213	107,106	345,213
Investment securities held to maturity	288,035	21,862	288,035	21,862
Other liabilities	107,802	101,172	107,561	101,061
	<b>598,070</b>	<b>571,830</b>	<b>590,864</b>	<b>565,371</b>

The maximum exposure to credit risk for receivables from policyholders on the date of the statement of Financial Position for each customer type, were:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Company's Network	10,112	6,817	10,112	6,817
Agents and associates	45,448	39,969	45,448	39,969
Other	4,393	9,449	4,276	9,382
	<b>59,953</b>	<b>56,235</b>	<b>59,836</b>	<b>56,168</b>

There is no particular concentration of risk by geographic area, because the Group operates mainly in Greece.

Listed below is an analysis of financial assets that are either past due or meet the requirements of being written off:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Financial assets that are not past due and do not qualify for write-off	568,033	548,371	560,827	541,912
Financial assets that are past due and qualify for write-off	30,037	23,459	30,037	23,459
Impaired financial assets	25,860	10,351	25,860	10,351
Impairment provisions	(25,860)	(10,351)	(25,860)	(10,351)
	<b>598,070</b>	<b>571,830</b>	<b>590,864</b>	<b>565,371</b>

The Company has made provision for impairment to the amount of € 1.712 and write-offs of previous years' receivables of € 1.034, with a corresponding reduction of the already formed impairment provision.

Listed below is the long-term debt rating of these financial assets, based on the assessments of Moody's on the closing date of financial statements:

### FINANCIAL ASSETS' DEBT RATING COMPANY 2010

DESCRIPTION	TOTAL	Ba1	B1	WITHOUT DEBT RATING
Cash and cash equivalents	77,298	-	77,298	-
Receivables from loans	7,018	-	-	7,018
Financial assets in fair value through results	3,846	-	-	3,846
Investment securities available for sale	107,106	52,333	50,353	4,420
Investment securities held to maturity	288,035	278,035	-	10,000
Receivables from premiums	59,836	-	-	59,836
Receivables from reinsurers*	34,949	-	-	34,949
Other assets	12,776	-	-	12,776
	<b>590,864</b>	<b>330,368</b>	<b>127,651</b>	<b>132,845</b>

\* The greatest part of receivables to reinsurers concerns Munich Re and Swiss Re Group with creditworthiness based on Moody's Aa3 assessments.

### COMPANY 2009

DESCRIPTION	TOTAL	A1	Baa1	Baa2	WITHOUT DEBT RATING
Cash and cash equivalents	83,420	-	83,420	-	-
Receivables from loans	7,865	-	-	-	7,865
Financial assets in fair value through results	5,950	-	-	-	5,950
Investment securities available for sale	345,213	343,713	-	1,500	-
Investment securities held to maturity	21,862	21,862	-	-	-
Receivables from premiums	56,168	-	-	-	56,168
Receivables from reinsurers*	35,564	-	-	-	35,564
Other assets	9,329	-	-	-	9,329
	<b>565,371</b>	<b>365,575</b>	<b>83,420</b>	<b>1,500</b>	<b>114,876</b>

#### Commercial and other receivables

The Company's exposure to credit risk is influenced by the characteristics of each partner through which the collection of receivables from insurance contracts is made.

The Company has set a credit policy under which the creditworthiness of each new associate is examined on an individual basis, before being offered the usual payment terms. The control ratings made by the Company include examining bank sources and other sources of credit ratings – if any. In monitoring the credit risk, associates are grouped according to the distribution network.

The Company records impairment provision which represents the estimate for losses on commercial and other receivables and investment securities. This provision primarily consists of impairment losses of specific receivables of significant risk and aggregate losses for groups of similar receivables

that have been assessed as realized but not yet made known. The consolidated provision for similar categories of receivables is determined by historical data of similar receivables.

### Investments

The Company limits its exposure to credit risk by investing only in liquid securities from counterparties who have high credit ratings. Given these high levels of credit rating, the Administration assesses that there will not be any case of default on these investments. The bulk of investments refer to the equity for non-bonds of Greek Banks and Greek government bonds, while a small part refers to equity in the Athens Stock Company for which relative impairment has been calculated. The Administration believes that particularly regarding Greek Banks' Bonds as well as Greek government Bonds, any deterioration in credit ratings by international rating agencies, does not alter the level of solvency. Given these levels of credit rating, the Administration assesses that there will not be any case of default on these investments.

The credit risk for the Company with respect to debt is low because they reflect the market prices, as opposed to investments held to maturity.

Below there is information on the portfolio held to maturity, which is most exposed to credit risk due to the valuation at amortized cost.

CLASSIFICATION BY TYPE OF SECURITY	COMPANY			
	FACE VALUE VALUE 2010	AMORTIZED COST VALUE 2010	CURRENT VALUE VALUE 2010	AVERAGE VALUE
1. Government Bonds (GGB)				
α) Fixed-rate (FXD)	285,510	257,829	180,938	65,05%
β) Floating rate (FRN)	30,000	20,206	16,650	55,50%
2. Products of guaranteed capital (Foreign bonds)	10,000	10,000	9,986	99,86%
<b>Total</b>	<b>325,510</b>	<b>288,035</b>	<b>207,574</b>	

### Warranties

The Company has a policy of not providing any financial guarantees to third parties, except for those relating to guarantees for repayment of insurance contracts issued by the Company and for the participation in various competitions where necessary and always subject to the approval of the Board of Directors of the Company.

### Loans

The Company's credit risk on loans provided is low because the loans are issued to employees and to policyholders of Life Insurance.

### Received Guarantee – Collaterals

In order to guarantee the loan, the Company requires safeguards (collaterals). The ones for loans acceptable by the Company are:

- Mortgages
- Concession of receivables

The Company generally requires that loans are covered with a “safeguard value” to reach 100% of the loan, so as to minimize the corresponding credit risk.

For medium- and long-term loans, the Company generally requires collaterals to have the form of mortgage on property. On the contrary, for loans with maturity of up to 18 months, the company accepts collaterals in another form, such as the first right to the bank account that the salaries of the debtor is being paid in.

## 4.2 Insurance Risk

The risk of an insurance contract is the probability of the occurrence of the insured risk and the uncertainty of the claim amounts. The insurance risk is both uncertain and not forecasted, due to the nature of the insurance contracts.

In an insurance portfolio where the theory of probability is applied for the pricing and the estimation of the insurance reserves, the main risk that the Company faces is the occurrence of higher claims in relation to the insurance provisions. This can occur when the frequency and the amount of the claims is greater than originally estimated.

The Company has adopted an insurance risk acceptance policy that allows them to minimize the antiselection risk. This means that the claims arising from the insured population will not significantly differ and may even be lower than the expected claims arising from the general population. The total portfolio of undertaken risks is formed by numerous different insurance risks and every risk category from a number of similar insurance contracts. The result of this composition is the diversification of risk and the reduction of the potential variability of the expected outcome. In addition, part of the risk is mitigated by the use of reinsurance.

### Maximum exposure to risk capital

The highest exposure of the Company to risk capital exposure concerns the additional coverage of hospital costs, which are unlimited and without reinsurance coverage. Addressing this risk is made through the adjustment of the annual premium and the effort of replacing the old with a new, more profitable portfolio.

Great exposure of the Company to risk capital also concerns the fire sector and particularly coverage against earthquake, which is covered by the “Catastrophe Excess of Loss” contract. The Company’s retention reaches € 3,000 for every claim or series of claims arising from the same event.

SECTOR	OWN DEDUCTION		REINSURERS		TOTAL	
	2010	2009	2010	2009	2010	2009
<b>1, Fire</b>						
Proportional	-	-	-	-	-	-
1.1, Catastrophe Excess of loss	5,000,000	3,000,000	195,000,000	222,000,000	200,000,000	225,000,000
1.2, Excess of loss	500,000	750,000	24,500,000	24,250,000	25,000,000	25,000,000
<b>2, Technical insurances (Proportional)</b>						
<b>2.1, Engineering &amp; Electronic Equipment</b>	1,050,000	1,050,000	49,250,000	49,250,000	50,300,000	50,300,000
<b>2.2, General Third Party Liability</b>	1,225,000	1,225,000	14,575,000	14,575,000	15,800,000	15,800,000
<b>2.3, Professional Indemnity</b>	1,110,000	1,110,000	9,490,000	9,490,000	10,600,000	10,600,000
<b>2.4, Miscellaneous Accident</b>	904,260	904,260	5,242,140	5,242,140	6,641,400	6,641,400
<b>3, Cars</b>						
Excess of loss	1,000,000	1,000,000	49,000,000	49,000,000	50,000,000	50,000,000
<b>4, Rural insurance</b>						
<b>4.1, Agro Proportional</b>	5,964,000	5,964,000	3,976,000	3,976,000	9,940,000	9,940,000
<b>4.2, Agro Excess of Loss</b>	1,000,000	1,000,000	4,000,000	4,000,000	5,000,000	5,000,000
<b>5, Transportations Excess of loss</b>	150,000	150,000	4,850,000	6,250,000	5,000,000	6,400,000
<b>6, Crafts Excess of Loss</b>	250,000	250,000	3,390,000	3,390,000	3,640,000	3,640,000
<b>7, Life</b>	480,000	330,000	7,840,000	7,930,000	8,320,000	8,260,000

#### Concentration of significant insurance risk by region (earthquake capital accumulation)

DANGER ZONE	2010			2009		
	AMOUNT OF CONTRACTS	INSURED CAPITALS	RISK TRANSFER	AMOUNT OF CONTRACTS	INSURED CAPITALS	RISK TRANSFER
Continental Greece (except for Athens & Piraeus)	8,228	1,716,410		6,537	1,408,777	
Athens & Piraeus	25,922	3,467,390		18,999	2,771,260	
<b>Total</b>	<b>34,150</b>	<b>5,183,800</b>	<b>0.00</b>	<b>25,536</b>	<b>4,180,037</b>	<b>0.00</b>

### Life insurance Contracts

#### General

Such insurance contracts insure events associated with human life (e.g. death or survival) in a long-term period, while life insurance contracts of a short period protect customers against consequences of events (such as death or disability) and the ability of the customer or the ones dependent upon them to maintain the current level of income.

Guaranteed benefits on these contracts paid to beneficiaries are either stable or dependent upon the amount of the economic loss of the insured party.

The risks associated with life insurance contracts mainly refer to risk of mortality, morbidity and

survival, investment performance risks, risks associated with the chargeable fees and risks arising from cancellation or surrender of insurance contracts.

### **Adequacy audit of reserves associated with life insurance contracts**

IFRS 4 requires an audit on whether all recognized insurance provisions (net of non-accrual acquisition costs and related intangible assets) are sufficient to cover liabilities arising from insurance contracts. In the event that these provisions are not adequate, an equal-amount provision is recorded against the results.

The methodology applied for the products of the life insurance sector was based on current estimates of future cash flows from insurance contracts, including estimates of direct administration costs associated with them. The life insurance programs in the life insurance sector were classified according to the nature of respective coverage, to the following main categories:

#### **1. Traditional Life Insurance Contracts**

##### ***1.1 Basic Principles - Projection of flows***

A projection is made by the modeling of all future cash flows based on the obligations of the Company as well as all other information relating to future liabilities (ie expenses). The projection period is extended to the life of the contracts. Future flows include all current and future rights of insured customers increased by DPF (cumulative dividends at the end of the year, future dividends from profit sharing).

The commissions paid for each existing contract are calculated based on the commission policy of the Company in the period of contract issuance.

Future payments related to reserves (ie surrenders) are calculated on legal basis and consideration is taken for any Zillmer / DAC decreases in calculations, in accordance with the technical specifications of each product. The same applies with any payments for premium refund / payment due to death / survival payments.

##### ***1.2 Assumptions***

###### Timing of events

The calculations are made on a monthly basis. We believe that the payment of all benefits is directly (ie at the end of the month of the first occurrence). This “contract” is a cautious assumption.

###### Mortality assumptions

Future mortality is evaluated by using the mortality table of the Greek Union of Actuaries 2005. This assumption is based on experience and market practices (which are also addressed by the Greek Insurance Association). This assumption is not based on experience from the data of the portfolio, since its size is not sufficient to extract statistically significant information.

###### Cases of contract surrenders

Future levels of contract surrenders are calculated by evaluating the previous experience of the Company. Future levels of contract discontinuations’ surrenders include cancellations and changes and are calculated based on the insurance years.

An additional assumption is adopted in pension contracts and pertains to the percentage of contracts that will receive a pension payout instead of pension, when they reach maturity.

Cost assumptions

The alleged future flows include administration fees. The assumptions are based on actual survey analysis and “cost allocation” performed each year, where the fixed and variable costs of the Company are allocated. The estimate of future cost is based on the economic environment and history.

Discount Rate

The present value of future cash flows was calculated by using percentages of the residual lives of the contracts. The discount rate assumptions were based on the interest rate curve of the European Central Bank.

Competence of Modeled Portfolio

The projection of flows is executed after each contract was taken into consideration. The data used is extracted from the computer database and includes all traditional life insurance contracts existing on the date of assessment. The percentage of total traditional portfolio that was included in the calculation is sufficient for an accurate overview of the overall portfolio position on the adequacy of liability.

**2. Contracts D.A.F. (Deposit Administration Funds)**

The methodology adopted for the examination of competences relates mainly with providing guaranteed rates.

*Discount Rate*

The same rate as in the traditional life contracts for calculating the present value of future cash flows as well as for calculating the amount of future profit sharing is used.

**Sensitivity examination**

The Company applied sensitivity analysis examination on some of those assumptions whose change results in significant changes in key outcomes such as costs, and on additional coverages.

The results of the additional calculations are presented in the table below:

SCENARIO	RESULTS IN MILLIONS €
Present Scenario	33.62
+10% Expenses	35.39
-10% Expenses	31.87

**Sensitivity analysis for Outstanding Claims’ Reserves**

The basic assumption made for calculating OCR using actuarial – statistical methods is that the average annual increase in the average cost of claims will be 3%. The sensitivity of the result in a 10% increase in this rate, would lead to an increase of approximately € 150.

## Non – life Insurance Contracts

### General

The products offered by the Company cover the full range of non-life risks other than credit risks. The Company has implemented appropriate policies to address risks arising from insurance contracts and mainly pertain to the process of risk assessment and claims management, reinsurance policy and the correct prediction of outstanding claims, as included in the annual Financial Statements.

### Examination of adequacy of reserves related to non-life insurance contracts

To assess the adequacy of reserves, appropriate actuarial models compatible with the Company's portfolio have been implemented.

Data acquired during the last decade for all major classes of the Company were used for the examination. The final calculation is the average of the results of each method.

### Evolution of insurance provisions for Automobile Liability

#### INSURANCE RISKS

YEAR LOSS	2004	2005	2006	2007	2008	2009	2010	TOTAL
<b>Estimated total cost:</b>								
- End of year 2010	<b>45,750</b>	<b>38,949</b>	<b>37,735</b>	<b>45,107</b>	<b>47,952</b>	<b>56,511</b>	<b>67,223</b>	<b>339,227</b>
Payment total to date	38,605	30,055	26,580	27,872	25,408	24,009	17,501	190,030
Reserve in Financial Statement	7,145	8,894	11,155	17,235	22,544	32,502	49,722	149,197
Reserve related to previous years								20,846
<b>Total reserve</b>								<b>170,043</b>

YEAR LOSS	2004	2005	2006	2007	2008	2009	ΣΥΝΟΛΟ
<b>Estimated total cost:</b>							
- End of year 2009	<b>43,830</b>	<b>39,466</b>	<b>38,332</b>	<b>46,967</b>	<b>51,424</b>	<b>60,022</b>	<b>280,041</b>
Payment total to date	37,470	27,455	23,073	23,791	21,786	15,488	149,063
Reserve in Financial Statement	6,360	12,011	15,259	23,176	29,638	44,534	130,978
Reserve related to previous years							25,724
<b>Total reserve</b>							<b>156,702</b>

## 5. DISCLOSURES AND ADJUSTMENTS

### 5.1 Reclassification of Funds

In fiscal year 2009, certain amounts have been reclassified in order to be comparable with those of the fiscal year 2009. The reclassifications in both the Statement of Financial Position and Cash Flow Statement are as following:

#### DECEMBER 31ST, 2009 GROUP

AMOUNTS OF STATEMENT OF FINANCIAL POSITION	ADJUSTED FIGURES	DISCLOSED FIGURES	RE-ADJUSTED FIGURES
Deferred tax liabilities	(21,008)	(20,808)	(200)
Other liabilities	40,587	40,387	200
Life insurance mathematical provisions	269,304	260,887	8,417
Non-life provisions for outstanding claims	227,407	198,879	28,528
Financial contracts where the insured parties bear the investment risk (Unit Linked)	-	26,230	(26,230)
Financial contracts from contracts management accounts	-	52,937	(52,937)
Liabilities from investment insurance policies	79,167	-	79,167
Other insurance provisions	5,793	42,738	(36,945)
<b>Total</b>	<b>601,250</b>	<b>601,250</b>	<b>-</b>

#### COMPANY

	ADJUSTED FIGURES	DISCLOSED FIGURES	RE-ADJUSTED FIGURES
Deferred tax liabilities	(21,008)	(20,808)	(200)
Other liabilities	40,487	40,287	200
Mathematical life insurance provisions	269,304	260,887	8,417
Non-life provisions for outstanding claims	227,365	198,837	28,528
Financial contracts where the insured parties bear the financial risk (Unit Linked)	-	26,230	(26,230)
Financial contracts from contracts management accounts	-	52,937	(52,937)
Liabilities from investment insurance policies	79,167	-	79,167
Other insurance provisions	5,793	42,738	(36,945)
<b>Total</b>	<b>601,108</b>	<b>601,108</b>	<b>-</b>

**DECEMBER 31ST, 2009  
GROUP**

STATEMENT OF TOTAL COST	ADJUSTED FIGURES	DISCLOSED FIGURES	RE-ADJUSTED FIGURES
Change in insurance provisions	(7,786)	(7,072)	(714)
(Losses) on valuation of investments	(1,426)	(278)	(1,148)
Other operating income	3,731	1,869	1,862
<b>Total</b>	<b>(5,481)</b>	<b>(5,481)</b>	<b>0</b>

**COMPANY**

	ADJUSTED FIGURES	DISCLOSED FIGURES	RE-ADJUSTED FIGURES
Change in insurance provisions	(7,797)	(7,082)	(715)
(Losses) on valuation of investments	(1,426)	(278)	(1,148)
Other operating income	3,732	1,869	(1,863)
<b>Total</b>	<b>(5,491)</b>	<b>(5,491)</b>	<b>0</b>

**DECEMBER 31ST, 2009  
GROUP**

CASH FLOW STATEMENT	REVALUED AMOUNTS	PUBLICIZED AMOUNTS	RECLASSIFICATION
Results (revenues, expenses, gains and losses) from investment activities	915	698	217
(Increase) / Decrease in receivables	(6,724)	(6,365)	(359)
Total inflows / outflows from operating activities	21,722	21,864	(142)
Exchange differences on cash and cash equivalents	(180)	(322)	142
<b>Total</b>	<b>21,542</b>	<b>21,542</b>	<b>0</b>

**COMPANY**

	REVALUED AMOUNTS	PUBLICIZED AMOUNTS	RECLASSIFICATION
Results (revenues, expenses, gains and losses) from investment activities	915	698	217
(Increase) / Decrease in receivables	(6,584)	(6,367)	(217)
Total inflows / outflows from operating activities	22,652	22,652	0
<b>Total</b>	<b>22,652</b>	<b>22,652</b>	<b>0</b>

## 6. NET WRITTEN PREMIUMS AND RELATED INCOME

### 2010 GROUP

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Written premiums	53,087	78,248	82,516	213,851
Change in unearned premiums	(923)	(2,106)	(2,534)	(5,563)
Ceded premiums	(1,377)	(1,581)	(25,880)	(28,838)
Related revenues	1,477	17,719	11,906	31,103
Net written premiums	<b>52,264</b>	<b>92,280</b>	<b>66,008</b>	<b>210,553</b>

### COMPANY

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Written premiums	53,061	78,248	82,058	213,367
Change in unearned premiums	(923)	(2,106)	(2,534)	(5,563)
Ceded premiums	(1,357)	(1,581)	(25,673)	(28,611)
Related revenues	1,477	17,719	11,907	31,103
Net written premiums	<b>52,258</b>	<b>92,280</b>	<b>65,758</b>	<b>210,296</b>

### 2009 GROUP

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Written premiums	54,121	65,957	78,514	198,592
Change in unearned premiums	(142)	(6,565)	(7,252)	(13,959)
Ceded premiums	(1,338)	(823)	(26,351)	(28,512)
Related revenues	1,577	14,336	10,809	26,722
Net written premiums	<b>54,218</b>	<b>72,905</b>	<b>55,720</b>	<b>182,843</b>

### COMPANY

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Written premiums	54,081	65,957	78,514	198,552
Change in unearned premiums	(142)	(6,565)	(7,252)	(13,959)
Ceded premiums	(1,338)	(823)	(26,245)	(28,406)
Related revenues	1,577	14,336	10,809	26,722
Net written premiums	<b>54,178</b>	<b>72,905</b>	<b>55,826</b>	<b>182,909</b>

## 7. COMMISSIONS PAID

### GROUP

DESCRIPTION	2010			2009		
	WRITTEN COMMISSIONS	CEDED COMMISSIONS	TOTAL	WRITTEN COMMISSIONS	CEDED COMMISSIONS	TOTAL
Life	(8,059)	213	(7,846)	(8,052)	248	(7,804)
Motor Third Party Liability	(10,067)	-	(10,067)	(8,882)	-	(8,882)
Other Non-Life	(11,675)	3,190	(8,485)	(9,600)	3,225	(6,375)
<b>Total</b>	<b>(29,801)</b>	<b>3,403</b>	<b>(26,398)</b>	<b>(26,534)</b>	<b>3,473</b>	<b>(23,061)</b>

### COMPANY

DESCRIPTION	2010			2009		
	WRITTEN COMMISSIONS	CEDED COMMISSIONS	TOTAL	WRITTEN COMMISSIONS	CEDED COMMISSIONS	TOTAL
Life	(8,064)	213	(7,851)	(8,057)	248	(7,809)
Motor Third Party Liability	(10,067)	-	(10,067)	(8,882)	-	(8,882)
Other Non-Life	(11,733)	3,190	(8,543)	(9,755)	3,225	(6,530)
<b>Total</b>	<b>(29,864)</b>	<b>3,403</b>	<b>(26,461)</b>	<b>(26,694)</b>	<b>3,473</b>	<b>(23,221)</b>

## 8. CLAIMS PAID TO POLICY HOLDERS (RETENTION)

### GROUP

DESCRIPTION	2010			2009		
	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL
Life	57,182	1,009	58,191	53,566	952	54,518
Motor Third Party Liability	47,926	255	48,181	49,480	307	49,787
Other Non-Life	19,537	3,599	23,136	18,420	8,520	26,940
<b>Total</b>	<b>124,645</b>	<b>4,863</b>	<b>129,508</b>	<b>121,466</b>	<b>9,779</b>	<b>131,245</b>

### COMPANY

DESCRIPTION	2010			2009		
	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL
Life	57,182	1,009	58,191	53,555	952	54,507
Motor Third Party Liability	47,926	255	48,181	49,480	307	49,787
Other Non-Life	19,523	3,599	23,122	18,416	8,520	26,936
<b>Total</b>	<b>124,631</b>	<b>4,863</b>	<b>129,494</b>	<b>121,451</b>	<b>9,779</b>	<b>131,230</b>

## 9. CHANGES IN INSURANCE PROVISIONS

### GROUP

DESCRIPTION	2010			2009		
	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL
Life	15,750	(496)	15,254	14,479	(88)	14,391
Motor Third Party Liability	(12,183)	360	(11,823)	(18,058)	(131)	(18,189)
Other Non-Life	(4,145)	765	(3,380)	(4,207)	(3,479)	(7,686)
<b>Total</b>	<b>(578)</b>	<b>629</b>	<b>51</b>	<b>(7,786)</b>	<b>(3,698)</b>	<b>(11,484)</b>

### COMPANY

DESCRIPTION	2010			2009		
	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL	COMPANY'S SHARE	REINSURERS' SHARE	TOTAL
Life	15,750	(496)	15,254	14,466	(88)	14,378
Motor Third Party Liability	(12,183)	360	(11,823)	(18,058)	(131)	(18,189)
Other Non-Life	(4,153)	765	(3,388)	(4,205)	(3,479)	(7,684)
<b>Total</b>	<b>(586)</b>	<b>629</b>	<b>43</b>	<b>(7,797)</b>	<b>(3,698)</b>	<b>(11,495)</b>

## 10. NET INTEREST INCOME

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
From investment securities available for sale	16,663	14,511	16,663	14,511
Other	2,599	2,284	1,681	1,355
<b>Interest and Related Revenues</b>	<b>19,262</b>	<b>16,795</b>	<b>18,344</b>	<b>15,866</b>
Interest paid to reinsurers and bank expenses	(240)	(250)	(240)	(250)
Other	(439)	(119)	-	-
<b>Interest and Related Expenses</b>	<b>(679)</b>	<b>(369)</b>	<b>(240)</b>	<b>(250)</b>
<b>Net Interest Income</b>	<b>18,583</b>	<b>16,426</b>	<b>18,104</b>	<b>15,616</b>

## 11. NET FEE AND COMMISSION INCOME

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Provisions from Mutual Funds	203	181	203	181
<b>Net income from fees and commissions</b>	<b>203</b>	<b>181</b>	<b>203</b>	<b>181</b>

## 12. GAIN / (LOSSES) ON FINANCIAL TRANSACTIONS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
(Losses) / Profits from sales of stocks – Trading Portfolio	(37)	991	(37)	991
Profits from sales of stocks – Available for sale	2,405	886	2,405	886
Profits from sales of bonds – Available for sale	262	2,620	262	2,621
(Losses) from bond recalls – Held to maturity	-	(2,593)	-	(2,593)
Other securities	(3,424)	(711)	(3,424)	(711)
<b>(Losses) / Profits from sales of investment securities</b>	<b>(794)</b>	<b>1,193</b>	<b>(794)</b>	<b>1,194</b>

## 13. PROFITS / (LOSSES) FROM VALUATION OF INVESTMENTS

DESCRIPTION	GROUP		COMPANY	
	31/12/10	31/12/09	31/12/10	31/12/09
Profits from evaluation of participations	93	303	93	303
Results from description bond evaluation	(239)	(728)	(239)	(728)
Results from securities evaluation - Trading portfolio	(2,208)	(1,001)	(2,208)	(1,001)
Impairment of Securities - "Available for Sale"	(14,631)	-	(14,631)	-
<b>(Losses) from investment evaluation</b>	<b>(16,985)</b>	<b>(1,426)</b>	<b>(16,985)</b>	<b>(1,426)</b>

## 14. DIVIDEND INCOME

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
From securities at fair value through results / trading portfolio	903	378	903	378
From investment securities available for sale	-	61	-	61
<b>Dividend Income</b>	<b>903</b>	<b>439</b>	<b>903</b>	<b>439</b>

## 15. OTHER OPERATING INCOME

DESCRIPTION	GROUP		COMPANY	
	31/12/10	31/12/09	31/12/10	31/12/09
Income from investment properties	494	433	494	433
Income from provisions of past years	1,584	830	1,584	830
Other income	871	606	828	606
Other income / expenses from investment insurance contracts	(907)	1,862	(907)	1,862
<b>Total</b>	<b>2,042</b>	<b>3,731</b>	<b>1,999</b>	<b>3,731</b>

The Incomes from Provisions of previous years refer to the removal of the € 1,584 provision that had been created over the previous year on a related penalty from the Competition Commission, which was annulled by the Court.

## 16. OPERATING EXPENSES

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Wages and salaries*	(36,361)	(27,091)	(35,915)	(26,681)
Third party fees	(5,167)	(3,717)	(5,098)	(3,620)
Marketing and Advertising expenses	(269)	(1,071)	(269)	(1,062)
Third party payments	(4,897)	(2,231)	(4,897)	(2,225)
Depreciation and impairment of assets	(988)	(915)	(945)	(886)
Rents	(983)	(951)	(938)	(919)
Taxes and fees	(478)	(450)	(478)	(450)
Retained taxes and interest of previous years	-	(1,510)	-	(1,510)
Provisions for accrued expenses with impairments**	(1,915)	(10,403)	(1,915)	(10,403)
Other expenses	(4,369)	(4,757)	(4,277)	(4,700)
<b>Total</b>	<b>(55,427)</b>	<b>(53,096)</b>	<b>(54,732)</b>	<b>(52,456)</b>

\* the following table analyzes Staff Wages and Salaries

\*\*Provisions for Accrued Expenses with Impairments imply to the following:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Payroll cost	(19,056)	(18,830)	(18,724)	(18,513)
Employer's contributions	(3,379)	(3,528)	(3,289)	(3,442)
Other benefits	(11,643)	(3,662)	(11,642)	(3,655)
Benefits during retirement	(2,283)	(1,071)	(2,260)	(1,071)
<b>Staff remunerations and expenses</b>	<b>(36,361)</b>	<b>(27,091)</b>	<b>(35,915)</b>	<b>(26,681)</b>

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Provision for doubtful receivables	(1,712)	(5,337)	(1,712)	(5,337)
Provisions for personnel		(1,282)	(203)	(1,282)
Provisions for litigious cases	-	(2,200)	-	(2,200)
Other provisions		(1,584)	-	(1,584)
<b>Provisions Total</b>	<b>(1,915)</b>	<b>(10,403)</b>	<b>(1,915)</b>	<b>(10,403)</b>

## 17. INCOME TAX

Greek tax and related regulations are subject to interpretations by tax authorities.

Tax returns are filed annually but the profits or losses declared for tax purposes remain provisional until the tax authorities examine the taxpayer's statements and records at the time when the related tax liabilities are finalized. Tax losses, to the extent in which they are accepted by the tax authorities, can be used to offset profits of the five subsequent years following the year concerned.

In accordance with the Greek tax law, the income tax rate on December 31st, 2010 was 24%.

During 2008, Law 3697/2008 (GG A194/25.9.2008) was passed, under which tax rates of 2010 through 2014 were set to 24%, 23%, 22%, 21% and 20% respectively. The above rates were used wherever required for the calculation of deferred taxation.

The last tax audit was conducted in year 2008 and covered years 2002 to 2007. Due to the audit, additional taxes and penalties were imposed, reaching the amount of € 1.900. The regular tax audits of years 2008 and 2009 is currently in progress.

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Income tax (current year)	(6,886)	422	(6,883)	459
Deferred tax	(3,098)	(4,114)	(3,094)	(4,111)
<b>Income tax</b>	<b>(9,984)</b>	<b>(3,692)</b>	<b>(9,977)</b>	<b>(3,652)</b>
<b>Profit before tax</b>	<b>7,477</b>	<b>(1,387)</b>	<b>7,316</b>	<b>(2,281)</b>
Tax rate	24%	25%	24%	25%
Income tax	(1,794)	(347)	(1,756)	(570)
Prior years' tax	(200)	459	(200)	459
Difference in rates	(450)	-	(450)	-
Income exempted from taxation	1,650	1,584	1,650	1,584
Non-deductible expenses	(6,746)	(5,417)	(6,777)	(5,417)
Other temporary differences	(2,444)	29	(2,444)	292
<b>Income taxes</b>	<b>(9,984)</b>	<b>(3,692)</b>	<b>(9,977)</b>	<b>(3,652)</b>

The Deferred Taxes' Analysis have affected income as follows:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Value Adjustment of tangible assets	(100)	61	(100)	61
Value Adjustment of real estate	(300)	(24)	(300)	(24)
Securities for trading purposes	-	(490)	-	(490)
Securities available for sale	-	(43)	-	(43)
Pension and other retirement benefits	(638)	30	(638)	30
Provisions for contingent liabilities	(90)	506	(90)	506
Tax losses for offsetting	(254)	-	(254)	-
Other temporary differences	(1,716)	(4,154)	(1,712)	(4,151)
<b>Deferred Tax</b>	<b>(3,098)</b>	<b>(4,114)</b>	<b>(3,094)</b>	<b>(4,111)</b>

## 18. (LOSSES) / EARNINGS PER SHARE

The basic earnings per share are calculated as follows:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
(Losses) after taxation	(2,507)	(5,079)	(2,661)	(5,932)
Weighted average number of shares issued in the period	27,318,347	27,318,347	27,318,347	27,318,347
<b>Basic and earnings per share (in absolute numbers)</b>	<b>(0.0918)</b>	<b>(0.1859)</b>	<b>(0.0974)</b>	<b>(0.2171)</b>

## 19. CASH AND CASH EQUIVALENTS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Cash	369	1,756	369	1,754
<b>Cash</b>	<b>369</b>	<b>1,756</b>	<b>369</b>	<b>1,754</b>
Demand deposits	10,798	10,980	10,798	10,980
Time deposits at financial institutions of Greece	65,101	70,086	65,101	70,086
Time deposits in foreign currencies	7,995	6,946	1,030	600
<b>Deposits</b>	<b>83,894</b>	<b>88,013</b>	<b>76,929</b>	<b>81,667</b>
<b>Cash and cash equivalents</b>	<b>84,263</b>	<b>89,768</b>	<b>77,298</b>	<b>83,420</b>

## 20. RECEIVABLES FROM LOANS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Loans to personnel	6,183	6,944	6,183	6,944
Loans to life insurance policyholders	830	894	830	894
Loans to associates	5	27	5	27
<b>Receivables from loans</b>	<b>7,018</b>	<b>7,865</b>	<b>7,018</b>	<b>7,865</b>

## 21. FINANCIAL ASSETS AT FAIR VALUE THROUGH RESULTS

CLASSIFICATION BY CATEGORY AND SECURITIES' MARKET	GROUP		COMPANY	
	2010 FAIR VALUE	2009 FAIR VALUE	2010 FAIR VALUE	2009 FAIR VALUE
<b>Domestic listed shares</b>	<b>3,846</b>	<b>5,950</b>	<b>3,846</b>	<b>5,950</b>

## 22. FINANCIAL SECURITIES AVAILABLE FOR SALE

CLASSIFICATION BY SECURITY CATEGORY	GROUP		COMPANY	
	2010 FAIR VALUE	2009 FAIR VALUE	2010 FAIR VALUE	2009 FAIR VALUE
<b>BONDS</b>				
Government Bonds – Domestic	52,333	282,564	52,333	282,564
Corporate Bonds – Listed – Foreign	-	208	-	208
<b>Bonds</b>	<b>52,333</b>	<b>282,772</b>	<b>52,333</b>	<b>282,772</b>
<b>SHARES</b>				
Listed - Domestic	5,075	9,324	5,075	9,324
Not Listed - Domestic *	276	1,813	276	1,813
<b>Total Shares</b>	<b>5,351</b>	<b>11,137</b>	<b>5,351</b>	<b>11,137</b>
<b>MUTUAL FUNDS' SHARES</b>				
Mutual Funds – Domestic	49,422	51,304	49,422	51,304
<b>Total Mutual Funds</b>	<b>49,422</b>	<b>51,304</b>	<b>49,422</b>	<b>51,304</b>
<b>TOTAL</b>	<b>107,106</b>	<b>345,213</b>	<b>107,106</b>	<b>345,213</b>

* DESCRIPTION OF UNLISTED SHARES	2010		2009	
	% SHARE	BOOK VALUE	% SHARE	BOOK VALUE
ATE LEASING	-	-	1.00%	730
ATE TECHNIKI – PLIROFORIKI	-	-	10.34%	474
ATE CARDS	-	-	2.00%	67
ATE ADVERTISING	-	-	12.70%	201
TOTAL CARE NETWORK	15.00%	118	15.00%	118
AUDATEX	10.00%	158	10.00%	158
ATE RENT	-	-	5.00%	50
ATE EXCELIXI	-	-	5.00%	15
<b>Total</b>		<b>276</b>		<b>1,813</b>

Shares of ATEbank of total value of € 931 are included in the Listed Domestic Shares.

The Company uses the following hierarchy to determine and disclose the fair value:

**Level 1:** Investments measured at fair value based on quoted prices in active markets.

**Level 2:** Investments measured at fair value based on the valuation models in which all the elements that significantly affect the fair value are based on observable market data.

**Level 3:** Investments measured at fair value based on pricing models in which all elements that significantly affect the fair value are not based on observable market data.

All Company investments are valued at fair value based on quotations from the Athens Stock Exchange, except for unlisted shares which are valued at cost, mainly due to the fact that they are companies of the ATEbank Group. It is estimated that their total value does not differ substantially from the total cost. The Company did not use any valuation model due to the non-significance of the relevant funds.

2010	LEVEL 1	LEVEL 2	LEVEL 3	TOTAL
<b>BONDS</b>				
Government Bonds – Domestic	52,333	-	-	52,333
Corporate Bonds – Listed – Foreign	-	-	-	-
<b>Bonds</b>	<b>52,333</b>	<b>-</b>	<b>-</b>	<b>52,333</b>
<b>SHARES</b>				
Listed - Domestic	8,921	-	-	8,921
Not Listed - Domestic *	-	-	276	276
<b>Total Shares</b>	<b>5,075</b>	<b>-</b>	<b>276</b>	<b>5,351</b>
<b>MUTUAL FUNDS' SHARES</b>				
Mutual Funds – Domestic	49,422	-	-	49,422
<b>Mutual Fund Shares</b>	<b>49,422</b>	<b>-</b>	<b>-</b>	<b>49,422</b>
<b>TOTAL</b>	<b>110,676</b>	<b>-</b>	<b>276</b>	<b>110,952</b>

2009	LEVEL 1	LEVEL 2	LEVEL 3	TOTAL
<b>BONDS</b>				
Government Bonds – Domestic	282,564	-	-	282,564
Corporate Bonds – Listed – Foreign	208	-	-	208
<b>Bonds</b>	<b>282,772</b>	-	-	<b>282,772</b>
<b>SHARES</b>				
Listed - Domestic	15,274	-	-	15,274
Not Listed - Domestic *	-	-	1,813	1,813
<b>Total Shares</b>	<b>9,324</b>	-	<b>1,813</b>	<b>11,137</b>
<b>MUTUAL FUNDS' SHARES</b>				
Mutual Funds – Domestic	51,304	-	-	51,304
<b>Mutual Fund Shares</b>	<b>51,304</b>	-	-	<b>51,304</b>
<b>TOTAL</b>	<b>349,350</b>	-	<b>1,813</b>	<b>351,163</b>

## 23. INVESTMENT SECURITIES HELD TO MATURITY

SECURITIES' DESCRIPTION	GROUP		COMPANY	
	31/12/2010 BOOK VALUE	31/12/2009 BOOK VALUE	31/12/2010 BOOK VALUE	31/12/2009 BOOK V ALUE
1. Greek Government Bonds (GGB)				
a) Fixed Rate Bonds (FXD) - Existing	7,462	-	7,462	-
b) Fixed Rate Bonds (FXD) – Transfer from Available for sale	250,367	-	250,367	-
c) Floating Rate Bonds (FRN) - Existing	12,156	11,862	12,156	11,862
d) Floating Rate Bonds (FRN) - Transfer from Available for sale	8,050	-	8,050	-
2. Capital guaranteed products – Foreign Corporate Bonds	10,000	10,000	10,000	10,000
<b>Σύνολο</b>	<b>288,035</b>	<b>21,862</b>	<b>288,035</b>	<b>21,862</b>

The non-amortized cost of Foreign Corporate Bonds equals their nominal value due to their purchase at par.

The Greek Government Bonds (GGB/FRN) of nominal value of € 15 million, transferred on April 1st, 2007 from the category “Available for sale” to the category “Held to maturity”, had an amortized cost of € 2.84 million, which is gradually being depreciated based on their holding to maturity. Their current value on December 31st, 2010 amounts to € 9.9 million, while the charge of the current period would be € 2.26 million in case they had not been transferred.

With the Administration’s decision there has been a change of category dated April 1st, 2010 from the “Available for sale” portfolio to the “Held to maturity” portfolio of the Greek Government Bonds (GGB) as listed below:

a) GGB (FXD) of nominal value of € 246.3 million which was also set as their cost price. Their current price on December 31st, 2010 amounts to € 180.9 million. Consequently, Total Other Income would be charged with € 65.40 million, had there not been for their transfer into the “Held to maturity” category.

b) GGB (FRN) of nominal value of € 15 million, whose fair (current) value on March 31st, 2010 was € 7.7 million, which was set as the cost price of these bonds. Their current value on December 31st, 2010 amounts to € 6.75 million. Consequently, Total Other Income would be charged with € 0.95 million, had there not been for their transfer into the “Held to maturity” category.

The formed deficit values until March 31st, 2010 of the above mentioned Bonds, amounted to € 35.8 million and are gradually being being depreciated based on their holding to maturity.

The reason for the previously mentioned change in the categorization of the financial instruments is the Company’s intention to maintain the related stocks in its possession until their maturity, which is accompanied by its ability to support this goal.

Apart from that and after the Management’s decision, Greek Government Bonds (GGB) of nominal value of € 11.01 million were listed directly into the “Held to maturity” (HTM) category, purchased in the 2nd and 3rd trimester of 2010, whose cost price was € 9.18 million.

The current value of all above Bonds on December 31st, 2010 amounts to € 207.57 million (31/12/2009: € 21.7 million).

#### COMPANY SECURITIES’ MOVEMENTS COMPANY 2010

	FINANCIAL INSTRUMENTS AVAILABLE FOR SALE	INVESTMENTS HELD TO MATURITY	COMMERCIAL PORTFOLIO	TOTAL
<b>Balance beginning 01/01/2010</b>	<b>345,213</b>	<b>21,862</b>	<b>5,950</b>	<b>373,025</b>
Purchases / sales	37,100	9,180	104	46,384
Valuations in Equity	(6,667)	-	-	(6,667)
Valuations in Result	(14,631)	-	(2,208)	(16,839)
Transfer from Available for sale to Held to maturity	(254,004)	254,004	-	-
Amortizations	95	2,989	-	3,084
<b>Balance end 31/12/2010</b>	<b>107,106</b>	<b>288,035</b>	<b>3,846</b>	<b>398,987</b>

## 2009

	BONDS			MUTUAL FUND SHARES FOREIGN MUTUAL FUNDS	TOTAL SECURITIES
	GOVERNMENT - DOMESTIC	LISTED CORPORATE	SHARES LISTED - DOMESTIC		
<b>Securities' Value 01/01/2009</b>	<b>316,682</b>	<b>536</b>	<b>11,199</b>	<b>43,537</b>	<b>371,954</b>
Purchases	22,715	-	14,539	2,600	39,854
Sales	(27,745)	(328)	(9,237)	-	(37,310)
Valuations in Equity	(10,866)	-	-	5,167	(5,699)
Amortizations	3,640	(1)	587	-	4,226
<b>Securities' Value 31/12/2009</b>	<b>304,426</b>	<b>208</b>	<b>17,087</b>	<b>51,304</b>	<b>373,025</b>

## 24. INVESTMENT FOR THE BENEFIT OF INSURANCE HOLDERS (UNIT LINKED)

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Other investments (Unit Linked)	23,447	26,230	23,447	26,230
<b>Total</b>	<b>23,447</b>	<b>26,230</b>	<b>23,447</b>	<b>26,230</b>

## 25. INSURANCE RECEIVABLES

The receivables from premiums are receivables from insurance contracts which have been issued until the date of compilation of the present Financial Statements and have not yet been collected.

The balance of these receivables is as following:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Receivables from premiums owed	68,732	63,650	68,615	63,583
<b>Less: Provision for doubtful receivables</b>	<b>(8,779)</b>	<b>(7,415)</b>	<b>(8,779)</b>	<b>(7,415)</b>
<b>Total</b>	<b>59,953</b>	<b>56,235</b>	<b>59,836</b>	<b>56,168</b>

The time analysis of receivables from premiums is as follows:

### COMPANY

DESCRIPTION	2010
Not expired of up to 6 months	31,404
6 months to 1 years	22,460
More than 1 year	14,751
<b>Total</b>	<b>68,615</b>

## 26. RECEIVABLES FROM REINSURERS

Receivables from reinsurers are related to their participation in outstanding claims and insurance reserves, for covering the reinsured risk.

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Receivables from reinsurers in outstanding claims	26,717	25,816	26,717	25,816
Receivables from reinsurers in insurance reserves	8,232	9,748	8,232	9,748
<b>Total</b>	<b>34,949</b>	<b>35,564</b>	<b>34,949</b>	<b>35,564</b>

## 27. PARTICIPATIONS IN AFFILIATED COMPANIES

### 2010

NAME	COUNTRY OF ORIGIN	% PARTICIPATION	BOOK VALUE
ATE INSURANCE ROMANIA S.A.	Romania	99.47%	8,272
<b>Investments in Associated Companies</b>			<b>8,272</b>

### 2009

NAME	COUNTRY OF ORIGIN	% PARTICIPATION	BOOK VALUE
ATE INSURANCE ROMANIA S.A.	Romania	99.47%	7,041
ATE MUTUAL FUNDS S.A.	Greece	46.00%	358
ATE SECURITIES AEPEY	Greece	33.38%	11,637
<b>Investments in Associated Companies</b>			<b>19,036</b>

ATE INSURANCE ROMANIA S.A. is consolidated by using the method of full consolidation.

ATE MUTUAL FUNDS S.A. and ATE SECURITIES AEPEY are consolidated by using the equity method of accounting.

In the Consolidated Financial Statements of 2010 there is an analogy of results for the companies ATE Mutual Funds and ATE AXEPEY (equity method) included for the first 5 months of 2010, when the Company possessed part of them (the buyout of these companies by AGROTIKI BANK OF GREECE S.A. was completed in June 2010).

## 28. GROUP'S AND COMPANY'S INVESTMENT PROPERTY

The Group and Company's real estate investments on December 31st, 2010 and 2009 are analyzed in the following tables:

### 2010

DESCRIPTION	LAND AND LOTS	BUILDINGS	TOTAL
<b>Net Book Value on 01/01/2010</b>	<b>2,788</b>	<b>4,745</b>	<b>7,533</b>
<b>Plus:</b>			
Purchases	-	-	-
(Decrease) / Increase in goodwill	(384)	255	(129)
Sales & Deregistrations	-	-	-
<b>Less:</b>			
Depreciation	-	-	-
Category change	-	-	-
<b>Net Book Value on 31/12/2010</b>	<b>2,404</b>	<b>5,000</b>	<b>7,404</b>

### 2009

DESCRIPTION	LAND AND LOTS	BUILDINGS	TOTAL
<b>Net Book Value on 01/01/2009</b>	<b>2,375</b>	<b>3,257</b>	<b>5,632</b>
<b>Plus:</b>			
Purchases	-	-	-
Increase in goodwill	1,134	-	1,134
Sales & Deregistrations	-	-	-
<b>Less:</b>			
Depreciation	-	(1,372)	(1,372)
Category change	(721)	2860	2,139
<b>Net Book Value on 31/12/2009</b>	<b>2,788</b>	<b>4,745</b>	<b>7,533</b>

Investments in property refer to buildings not used for own purposes and which are held aiming to produce income through rents as well as through property value increase. The income from rents for the fiscal year that ended on 31.12.2010 reached € 494 against € 433 on December 31st, 2009.

The analysis of the Company's real estate investments on December 31st, 2010 and 2009 appears in the following tables.

## 2010

NUMBER	CITY	ADDRESS	m <sup>2</sup>	FAIR VALUE OF BUILDINGS	FAIR VALUE OF LAND	TOTAL VALUE OF REAL ESTATE	TYPE OF INSTALLATION
1	Athens	Nr 173, Syggrou Avenue	415	1,203	-	1,203	ATEbank branch & 3 parking spaces
2	Athens	Nr 1, Filellinon Str.	748	1,616	1,147	2,763	ATE AXEPEY offices (4th- 5th floors)
3	Athens	Nr 2, Ermou Str.	703	1,425	922	2,347	ATE LEASING offices, 3rd floor
4	Thessaloniki	Nr 1, Democratias Square & Monastiriou Str.	65	99	56	155	5th floor – 2nd basement
5	Iraklio	Nr 2, Giannitson Str. (Kornarou Square)	132	183	136	319	4th floor
6	Kiato	Nr 24, Klisthenous Str.	292	152	41	193	Ground floor, first floor
7	Agrinio	Nr 10, Ilia Iliou Str.	322	322	102	424	4th floor
<b>Total</b>				<b>5,000</b>	<b>2,404</b>	<b>7,404</b>	

## 2009

NUMBER	CITY	ADDRESS	m <sup>2</sup>	FAIR VALUE OF BUILDINGS	FAIR VALUE OF LAND	TOTAL VALUE OF REAL ESTATE	TYPE OF INSTALLATION
1	Athens	Nr 173, Syggrou Avenue	415	1,276	-	1,276	ATEbank branch & 3 parking spaces
2	Athens	Nr 1, Filellinon Str.	748	1,162	1,319	2,481	ATE AXEPEY offices (4th- 5th floors)
3	Athens	Nr 2, Ermou Str.	703	1,693	1,178	2,871	ATE LEASING offices, 3rd floor
4	Thessaloniki	Nr 1, Democratias Square & Monastiriou Str.	65	102	58	160	5th floor – 2nd basement
5	Iraklio	Nr 2, Giannitson Str. (Kornarou Square)	132	59	100	159	4th floor
6	Kiato	Nr 24, Klisthenous Str.	292	116	32	148	Ground floor, first floor
7	Agrinio	Nr 10, Ilia Iliou Str.	322	337	101	438	4th floor
<b>Total</b>				<b>4,745</b>	<b>2,788</b>	<b>7,533</b>	

## 29. TANGIBLE FIXED ASSETS

The Group's and Company's Tangible Fixed Assets on December 31st, 2010 and 2009 are analyzed in the following tables:

2010  
GROUP

DESCRIPTION	LAND & PLOTS	BUILDINGS	VEHICLES	FURNITURE & FIXTURES	IMPROVEMENTS ON THIRD PARTY LEASED PROPERTIES	TANGIBLE ASSETS UNDER CONSTRUCTION	TOTAL
<b>Opening balance</b>							
Acquisition cost	33,471	48,003	275	11,763	226	16,123	109,861
Accrued Depreciation	-	(182)	(234)	(9,057)	(221)	(16,123)	(25,817)
<b>Net Book Value 01/01/2010</b>	<b>33,471</b>	<b>47,821</b>	<b>41</b>	<b>2,706</b>	<b>5</b>	<b>-</b>	<b>84,044</b>
<b>Plus:</b>							
Purchases	-	360	67	117	-	-	544
<b>Less:</b>							
Depreciation	-	(191)	(26)	(602)	(5)	-	(824)
<b>Net Book Value 31/12/2010</b>	<b>33,471</b>	<b>47,990</b>	<b>82</b>	<b>2,221</b>	<b>5</b>	<b>-</b>	<b>83,764</b>
Acquisition cost	33,471	48,363	342	11,880	226	16,123	110,405
Accrued depreciation and impairment	-	(373)	(260)	(9,659)	(226)	(16,123)	(26,641)
<b>Net Book Value 31/12/2010</b>	<b>33,471</b>	<b>47,990</b>	<b>82</b>	<b>2,221</b>	<b>-</b>	<b>-</b>	<b>83,764</b>

## COMPANY

DESCRIPTION	LAND & PLOTS	BUILDINGS	VEHICLES	FURNITURE & FIXTURES	IMPROVEMENTS ON THIRD PARTY LEASED PROPERTIES	TANGIBLE ASSETS UNDER CONSTRUCTION	TOTAL
<b>Opening balance</b>							
Acquisition cost	33,471	48,003	264	11,736	226	16,123	109,823
Accrued Depreciation and impairment	-	(182)	(231)	(9,039)	(217)	(16,123)	(25,792)
<b>Net Book Value 01/01/2010</b>	<b>33,471</b>	<b>47,821</b>	<b>33</b>	<b>2,697</b>	<b>9</b>	<b>-</b>	<b>84,031</b>
<b>Plus:</b>							
Purchases	-	360	67	105	-	-	532
<b>Less:</b>							
Depreciation	-	(191)	(22)	(596)	(5)	-	(814)
<b>Net Book Value 31/12/2010</b>	<b>33,471</b>	<b>47,990</b>	<b>78</b>	<b>2,206</b>	<b>4</b>	<b>-</b>	<b>83,749</b>
Acquisition cost	33,471	48,363	331	11,841	226	16,123	110,355
Accrued Depreciation and impairment	-	(373)	(253)	(9,635)	(222)	(16,123)	(26,606)
<b>Net Book Value 31/12/2010</b>	<b>33,471</b>	<b>47,990</b>	<b>78</b>	<b>2,206</b>	<b>4</b>	<b>-</b>	<b>83,749</b>

**2009  
GROUP**

DESCRIPTION	LAND & PLOTS	BUILDINGS	VEHICLES	FURNITURE & FIXTURES	IMPROVEMENTS ON THIRD PARTY LEASED PROPERTIES	TANGIBLE ASSETS UNDER CONSTRUCTION	TOTAL
<b>Opening balance</b>							
Acquisition cost	32,750	49,255	275	9,937	226	16,123	108,566
Accrued Depreciation	-	(964)	(216)	(8,891)	(208)	(16,123)	(26,402)
<b>Net Book Value 01/01/2009</b>	<b>32,750</b>	<b>48,291</b>	<b>59</b>	<b>1,046</b>	<b>18</b>	<b>-</b>	<b>82,164</b>
<b>Plus:</b>							
Purchases	-	2,572	-	2,663	-	-	5,235
Sales & Deregistrations	-	-	-	(837)	-	-	(837)
<b>Less:</b>							
Depreciation	-	(182)	(18)	(166)	(13)	-	(379)
Category change	721	(2,860)	-	-	-	-	(2,139)
<b>Net Book Value 31/12/2009</b>	<b>33,471</b>	<b>47,821</b>	<b>41</b>	<b>2,706</b>	<b>5</b>	<b>-</b>	<b>84,044</b>
Acquisition cost	33,471	48,967	275	11,763	226	16,123	110,825
Accrued Depreciation and impairment	-	(1,146)	(234)	(9,057)	(221)	(16,123)	(26,781)
<b>Net Book Value 31/12/2009</b>	<b>33,471</b>	<b>47,821</b>	<b>41</b>	<b>2,706</b>	<b>5</b>	<b>-</b>	<b>84,044</b>

## COMPANY

DESCRIPTION	LAND & PLOTS	BUILDINGS	VEHICLES	FURNITURE & FIXTURES	IMPROVEMENTS ON THIRD PARTY LEASED PROPERTIES	TANGIBLE ASSETS UNDER CONSTRUCTION	TOTAL
<b>Opening balance</b>							
Acquisition cost	32,750	49,255	264	9,912	226	16,123	108,530
Accrued Depreciation and impairment	-	(964)	(213)	(8,882)	(208)	(16,123)	(26,390)
<b>Net Book Value 01/01/2009</b>	<b>32,750</b>	<b>48,291</b>	<b>51</b>	<b>1,030</b>	<b>18</b>	<b>-</b>	<b>82,140</b>
<b>Plus:</b>							
Purchases	-	2,572	-	2,661	-	-	5,233
Sales & Deregistrations	-	-	-	(837)	-	-	(837)
<b>Less:</b>							
Depreciation	-	(182)	(18)	(157)	(9)	-	(366)
Category change	721	(2,860)	-	-	-	-	(2,139)
<b>Net Book Value 31/12/2009</b>	<b>33,471</b>	<b>47,821</b>	<b>33</b>	<b>2,697</b>	<b>9</b>	<b>-</b>	<b>84,031</b>
Acquisition cost	33,471	48,967	264	11,736	226	16,123	110,787
Accrued Depreciation and impairment	-	(1,146)	(231)	(9,039)	(217)	(16,123)	(26,756)
<b>Net Book Value 31/12/2009</b>	<b>33,471</b>	<b>47,821</b>	<b>33</b>	<b>2,697</b>	<b>9</b>	<b>-</b>	<b>84,031</b>

No depreciation has been accounted for the Company's new office building (Nr 173, Syggrou Avenue), as it has not been used yet. The last valuation in real estates' current value took place on December 31st, 2008.

The analysis of own-used Company's property as December 31st, 2010 appears in the following table:

ANNUAL FINANCIAL REPORT 2010

NUMBER	CITY	ADDRESS	m <sup>2</sup>	FAIR VALUE OF BUILDINGS 31/12/2010	FAIR VALUE OF LAND 31/12/2010	TOTAL VALUE OF REAL ESTATE 31/12/2010	TYPE OF INSTALLATION
1	Athens	Nr 163, Syggrou Avenue	3,577	2,525	5,075	7,600	5-floor building
2	Athens	Nr 4, Syggrou Avenue	709	687	938	1,625	5-floor building
3	Athens	Nr 173, Syggrou Avenue	12,261	39,865	21,504	61,009	Block of two multifloor buildings
4	Piraeus	Nr 25, 34 Syntagmatos Str.	235	376	72	448	5th floor
5	Piraeus	Nr 21 Akti Miaouli	638	999	564	1,563	6th & 7th floors, terrace & basement
6	Thessaloniki	Nr 33, Tsimiski Str.	387	354	982	1,336	3rd floor
7	Thessaloniki	Nr 33, Tsimiski Str.	387	63	982	1,045	4th floor
8	Thessaloniki	Nr 110, Mitropoleos Str.	416	552	313	865	4th floor
9	Thessaloniki	Nr 1, Democratias Square & Monastiriou Str.	337	652	319	971	4th floor - Basement
10	Patra	Nr 8, Kolokotroni Str.	360	210	324	534	1st & 2nd floors
11	Patra	Nr 8, Kolokotroni Str.	92	30	83	113	4th floor
12	Larissa	Nr 72, Papanastasiou Str.	336	247	334	581	5th floor
13	Iraklio	Nr 1, Demokratias Square – Ntore Building	288	123	465	588	5th floor
14	Iraklio	Nr 3, Democratias Ave.	494	272	272	544	Ground Floor – A & B Basements
15	Ioannina	Nr 24, N. Zerva Str.	334	392	281	673	1st, 2nd & 3rd floors
16	Alexandroupolis	Nr 264, V. Georgiou Str.	171	136	183	319	2nd floor
17	Kavala	Nr 8, Mitropoloos Str	186	248	140	388	1st floor
18	Karditsa	Nr 25, Iroon Politechniou Str.	201	118	117	235	4th floor
19	Agrinio	Nr 10, Iliia Iliou Str.	141	141	38	179	4th floor - terrace
20	Rio	Charalambopoulou Str. (Gounaradika – Agios Vassilios)	2,557	-	460	460	Plot (out of town plan)
21	Sitia	Agios Spiridon – Polissos, Sitia (Paleomantres – Lasithi)	7,038	-	25	25	Field
<b>Total</b>				<b>47,990</b>	<b>33,471</b>	<b>81,461</b>	

### 30. DEFERRED TAX RECEIVABLES

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Revaluation of intangible assets	74	88	74	88
Revaluation of tangible assets	634	1,020	634	1,020
Trading securities	-	-	-	-
Investment securities available for sale	1,670	9,497	1,670	9,497
Investment securities held to maturity	-	-	-	-
Pension and other retirement benefits	1,735	1,867	1,735	1,867
Provisions for contingent liabilities	10,436	12,753	10,445	12,753
Tax losses for offsetting	-	254	-	254
<b>Receivables from deferred taxes</b>	<b>14,549</b>	<b>25,479</b>	<b>14,558</b>	<b>25,479</b>
Revaluation of tangible assets	(4,471)	(4,471)	(4,471)	(4,471)
<b>Provisions for contingent liabilities</b>	<b>(4,471)</b>	<b>(4,471)</b>	<b>(4,471)</b>	<b>(4,671)</b>
<b>Net Receivables / Liabilities due to deferred taxes</b>	<b>10,078</b>	<b>21,008</b>	<b>10,087</b>	<b>21,008</b>

The movement of deferred tax is as follows:

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Starting balance	21,008	26,700	21,008	26,700
Effect on result	(3,103)	(4,111)	(3,094)	(4,111)
Effect on Equity	(7,828)	(1,581)	(7,828)	(1,581)
<b>End balance</b>	<b>10,078</b>	<b>21,008</b>	<b>10,087</b>	<b>21,008</b>

### 31. COMMISSIONS AND OTHER DEFERRED PRODUCTION COSTS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Commissions and other deferred production expenses (D.A.C.) Life	10,301	10,777	10,272	10,777
Commissions and other deferred production expenses (D.A.C.) Motor Third Party Liability	3,539	3,407	3,539	3,407
Commissions and other deferred production expenses χρήσεων (D.A.C.) Other Non Life	4,306	4,349	4,306	4,349
<b>Other assets</b>	<b>18,146</b>	<b>18,533</b>	<b>18,117</b>	<b>18,533</b>

## 32. OTHER ASSETS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Other accrued revenues falling due next year (interest)	7,865	6,431	7,803	6,388
Other litigious receivables	1,604	1,605	1,604	1,605
Receivables from reinsurers	949	1,025	949	1,025
Other	4,933	3,248	4,870	3,246
Provisions for impairment	(2,450)	(2,936)	(2,450)	(2,936)
<b>Other assets</b>	<b>12,900</b>	<b>9,373</b>	<b>12,776</b>	<b>9,329</b>

## 33. RETIREMENT BENEFIT OBLIGATIONS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
<b>Balance Sheet Liability</b>				
Retirement benefits – Non funded L. 2112	5,370	7,469	5,347	7,469
<b>Total liability</b>	<b>5,370</b>	<b>7,469</b>	<b>5,347</b>	<b>7,469</b>

### A. RETIREMENT BENEFITS – NON FUNDED (L. 2112)

DESCRIPTION	GROUP		COMPANY	
	31/12/2010	31/12/2009	31/12/2010	31/12/2009
Present Value of Liabilities	6,306	7,533	6,283	7,533
Actuarial (losses) non recognized	(936)	(64)	(936)	(64)
<b>Balance Sheet Liability</b>	<b>5,370</b>	<b>7,469</b>	<b>5,347</b>	<b>7,469</b>
<b>Charge on results</b>				
Service cost	410	652	387	652
Cost & benefits of retired personnel	1,421	-	1,421	-
Interest / Expenses	452	419	452	419
<b>Total Charge (Personnel Expenses)</b>	<b>2,283</b>	<b>1,071</b>	<b>2,260</b>	<b>1,071</b>
<b>Change for the year</b>				
Opening balance	7,469	7,349	7,469	7,349
Change in the year	2,283	1,071	2,260	1,071
Benefits paid	(4,382)	(951)	(4,382)	(951)
<b>Total</b>	<b>5,370</b>	<b>7,469</b>	<b>5,347</b>	<b>7,469</b>

The actuarial study is reviewed every year. The key assumptions / concessions underlying the actuarial study conducted for the present year, are as follows:

ACTUARIAL STUDY –ASSUMPTIONS AND CONCESSIONS – L. 2112	2010	2009
Discount rate	4.60%	6.00%
Expected return of plan assets	4.60%	6.00%
Percentage increase of future wages – pensions	4.52%	4.52%
Average remaining working life	11.59	12.12

In accordance with the International Financial Reporting Standards (IFRS) the Company's obligations to employees in defined contribution pension plans, are defined with exhaustion of the Company's obligation (defined contribution).

A liability is considered to refer to a defined contribution plan, when its accrued part is accounted on a regular basis. This practice is similar to the one followed by the existing Greek law, i.e. the payment of employers' contributions for the above employee service to Insurance Funds.

For the defined benefit plans the IFRS has set specific rules regarding the valuation of existing liability as well as the principles and actuarial assumptions that must be followed during the evaluation of liability that arises from the certain benefit plans. The liability that is recorded is based on the projected unit credit method, which calculates the present value of the liability less the fair value of the assets that may exist.

The assessment of these benefits to employees was conducted by PRUDENTIAL Company.

### 34. LIABILITIES TO REINSURERS

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Liabilities to reinsurers	14,539	10,378	14,447	10,354
<b>Total</b>	<b>14,539</b>	<b>10,378</b>	<b>14,447</b>	<b>10,354</b>

### 35. OTHER LIABILITIES

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Expenses payable and income falling due	1,408	25	1,408	25
Creditors and suppliers	4,792	5,089	4,792	5,069
Tax & duty liabilities (excluding income tax)	8,051	8,476	8,031	8,422
Income tax	6,775	-	6,683	-
Liabilities to State and State controlled companies	1,735	1,655	1,735	1,655
Liabilities to insurers, agents, sales' consultants	11,065	10,781	11,065	10,781
Other liabilities	2,805	4,183	2,800	4,181
<b>Other liabilities</b>	<b>36,631</b>	<b>30,209</b>	<b>36,514</b>	<b>30,133</b>

### 36. LIABILITIES FROM INVESTMENT INSURANCE COMPANIES

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Life insurance contracts connected to investments that have no insurance risk (Unit Linked)	23,447	26,230	23,447	26,230
Financial contracts from Deposit Administration Funds (DAF)	55,998	52,937	55,998	52,937
<b>Liabilities from investment insurance contracts</b>	<b>79,445</b>	<b>79,167</b>	<b>79,445</b>	<b>79,167</b>

### 37. COMPANY INSURANCE PROVISIONS

DESCRIPTION	TOTAL		COMPANY		REINSURERS	
	2010	2009	2010	2009	2010	2009
<b>LIFE RESERVES</b>						
Actuarial Life Insurance Reserves	235,155	252,326	235,155	252,326	-	-
Unearned Premium Life Insurance Reserves	11,652	10,729	11,652	10,729	-	-
Provisions for bonuses, dividends and refund of premiums - Life insurance	15,271	16,978	15,271	16,978	-	-
Life Insurance Outstanding Claims	24,251	22,243	22,101	20,589	2,150	1,654
Other Insurance Provisions	4,137	2,521	4,137	2,521	-	-
<b>Total life reserves</b>	<b>290,466</b>	<b>304,797</b>	<b>288,316</b>	<b>303,143</b>	<b>2,150</b>	<b>1,654</b>
<b>MOTOR THIRD PARTY LIABILITY RESERVES</b>						
Unearned Premium Reserves	30,809	28,703	30,809	28,703	-	-
Outstanding Claims	170,043	156,702	168,222	154,521	1,821	2,181
Other Insurance Provisions	1,754	3,272	1,754	3,272	-	-
<b>Total Motor Third Party Liability Reserves</b>	<b>202,606</b>	<b>188,677</b>	<b>200,785</b>	<b>186,496</b>	<b>1,821</b>	<b>2,181</b>
<b>NON LIFE RESERVES</b>						
Unearned premium reserves	38,303	37,284	30,071	27,537	8,232	9,747
Outstanding reserves	53,338	48,420	30,592	26,439	22,746	21,981
<b>Total non Life reserves</b>	<b>91,641</b>	<b>85,704</b>	<b>60,663</b>	<b>53,976</b>	<b>30,978</b>	<b>31,728</b>
<b>Financial Contracts from Capital Management Accounts</b>	<b>55,998</b>	<b>52,937</b>	<b>55,998</b>	<b>52,937</b>	<b>-</b>	<b>-</b>
<b>Provisions for life insurance premiums where the policyholder bears the risk (Unit Linked)</b>	<b>23,447</b>	<b>26,230</b>	<b>23,447</b>	<b>26,230</b>	<b>-</b>	<b>-</b>
<b>Total Insurance Reserves</b>	<b>664,158</b>	<b>658,345</b>	<b>629,209</b>	<b>622,782</b>	<b>34,949</b>	<b>35,563</b>

Insurance provisions for ATE Insurance Romania S.A. on December 31st, 2010 amount to € 67 and therefore the total group's retention amounts to € 664,225.

Financial contracts from Capital Management Accounts include the account Capital Management of € 14,082 (2009: 14,696), concerning the group contracts of Defined benefit plan for the Company's employees.

## Changes in Technical Provisions

	GROUP		COMPANY	
	2010	2009	2010	2009
<b>Balance of technical reserves – Life at the beginning of the period</b>	<b>252,326</b>	<b>265,112</b>	<b>252,326</b>	<b>265,112</b>
Net premiums <sup>(1)</sup>	13,556	14,567	13,556	14,567
Claims paid <sup>(2)</sup>	(31,309)	(23,438)	(31,309)	(23,438)
Credited technical interest	6,873	7,439	6,873	7,439
Other changes <sup>(3)</sup>	(6,291)	(11,354)	(6,291)	(11,354)
<b>Balance of technical reserves – Life at the end of the year</b>	<b>235,155</b>	<b>252,326</b>	<b>235,155</b>	<b>252,326</b>

(1) "Net premiums" are defined as the net annual premiums in existing contracts.

(2) It includes maturities, redemptions, death.

(3) Includes credits/reserve increases due to investment income, administration fee charges, acquisition costs and charges to cover deaths, differences between amounts for claims paid and reserves released, litigation reserves that were released due to cancellations and other changes in reserves.

CHANGES IN TECHNICAL RESERVES - UNIT LINKED	GROUP		COMPANY	
	2010	2009	2010	2009
<b>Balance of technical reserves – Unit Linked at the beginning of the period</b>	<b>26,230</b>	<b>23,862</b>	<b>26,230</b>	<b>23,862</b>
Additional liabilities and changes	3,193	3,630	3,193	3,630
Reserve release due to deaths, expirations, redemptions, cancellations etc.	(3,146)	(2,161)	(3,146)	(2,161)
Other changes	(2,830)	899	(2,830)	899
<b>Balance of technical reserves – Unit Linked – at the end of the year</b>	<b>23,447</b>	<b>26,230</b>	<b>23,447</b>	<b>26,230</b>

## Changes in Technical Reserves of Motor Third Party Liability

### COMPANY

	2010
Outstanding Claims 2009	156,702
Incurred Claims 2010	52,505
Payouts 2010	(17,501)
Previous years' payouts	(27,459)
IBNR	31,103
Changes in outstanding claims for previous years	(25,307)
<b>Balance of technical reserves at year end</b>	<b>170,043</b>

	<b>2009</b>
Outstanding Claims 2008	129,741
Incurring Claims 2009	45,862
Payouts 2009	(16,542)
Previous years' payouts	(30,377)
IBNR	22,400
Changes in outstanding claims for previous years	5,618
<b>Balance of technical reserves at year end</b>	<b>156,702</b>

### 38. SHARE CAPITAL

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Number of common shares	27,318,347	27,318,347	27,318,347	27,318,347
Paid Capital	40,978	40,978	40,978	40,978
<b>Share Capital</b>	<b>40,978</b>	<b>40,978</b>	<b>40,978</b>	<b>40,978</b>
<b>Share premium</b>	<b>614</b>	<b>614</b>	<b>614</b>	<b>614</b>

The Company's share capital as on December 31st, 2009 and December 31st, 2010 amounts to € 40,978, divided into 27,318,347 shares, with a face value of € 1.50 each. There were no changes during the current period. The Company throughout the whole period did not hold any own shares.

### 39. RESERVES

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Other reserves	500	1,276	500	1,276
Revaluation reserve of available for sale securities				
- Acquisition cost	(50,864)	(47,385)	(50,864)	(47,385)
- Income tax	1,670	9,497	1,670	9,497
Reserve for the revaluation of fixed assets (L.3229/04)	10,478	10,478	10,478	10,478
Reserve for revaluation of fixed assets under IAS 16				
- Acquisition value	22,357	22,357	22,357	22,357
- Income tax	(4,471)	(4,471)	(4,471)	(4,471)
Foreign Exchange differences due to conversion of assets of foreign economic units	(1,472)	(1,235)	-	-
<b>Reserves</b>	<b>(21,802)</b>	<b>(9,483)</b>	<b>(20,330)</b>	<b>(8,248)</b>

**Statutory reserve:** Formed in accordance with the provisions of L. 2190 / 1920.

**Tax-free reserves:** They are formed based on special provisions and laws and are not intended to be distributed in the subsequent fiscal years. For these reserves, according to I.A.S. 12 no deferred tax was calculated.

**Taxed reserves:** They are formed from the past and are fully taxed. They may be capitalized or distributed without additional charge.

**Reserves for the revaluation of fixed assets (L.3229 / 04):** This reserve is formed by revaluating the fixed assets of the Company in accordance with the provisions of L. 3229/2004 and is taxed during formation.

## 40. SEGMENT REPORTING

The Company operated and monitors its operations in two key sectors, Life and Non-Life Insurance. Non-Life Insurance is divided into Motor Third Party Liability and Other Life Insurance. The General Management of the Company receives and inspects the relevant reports, that are prepared on an at least quarterly basis by the Budget Department.

### GROUP INCOME STATEMENT 2010

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Gross Written Premiums	54,564	95,967	94,424	244,955
Reinsurance Premiums	(1,377)	(1,581)	(25,880)	(28,838)
Commissions paid	(7,846)	(10,067)	(8,485)	(26,398)
Claims paid to policyholders	(57,182)	(47,926)	(19,537)	(124,645)
Technical reserves charges	14,827	(14,289)	(6,679)	(6,141)
Investment income	1,337	363	210	1,910
<b>(Loss) / Profit per operation</b>	<b>4,323</b>	<b>22,467</b>	<b>34,053</b>	<b>60,843</b>
Other Income	(607)	2,103	546	2,042
Administrative Expenses	(11,773)	(20,335)	(21,405)	(53,512)
Other expenses	(421)	(728)	(766)	(1,915)
Results from associated companies	14	4	2	20
<b>(Losses) / Profit before taxation</b>	<b>(8,464)</b>	<b>3,511</b>	<b>12,430</b>	<b>7,477</b>

## 2009

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Gross Written Premiums	55,698	80,293	89,323	225,314
Reinsurance Premiums	(1,338)	(823)	(26,351)	(28,512)
Commissions paid	(7,804)	(8,882)	(6,375)	(23,061)
Claims paid to policyholders	(53,566)	(49,480)	(18,420)	(121,466)
Technical reserves charges	14,337	(24,623)	(11,459)	(21,745)
Investment income	11,424	3,413	1,976	16,813
<b>(Loss) / Profit per operation</b>	<b>18,751</b>	<b>(102)</b>	<b>28,694</b>	<b>47,343</b>
Other Income	2,304	640	787	3,731
Administrative Expenses	(8,790)	(12,736)	(15,658)	(37,184)
Other expenses	(3,761)	(5,450)	(6,701)	(15,912)
Results from associated companies	445	120	70	635
<b>(Losses) / Profit before taxation</b>	<b>8,949</b>	<b>(17,528)</b>	<b>7,192</b>	<b>(1,387)</b>

**COMPANY INCOME STATEMENT  
2010**

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Gross Written Premiums	54,538	95,967	93,966	244,471
Reinsurance Premiums	(1,357)	(1,581)	(25,673)	(28,611)
Commissions paid	(7,851)	(10,067)	(8,543)	(26,461)
Claims paid to policyholders	(57,182)	(47,926)	(19,523)	(124,631)
Technical reserves charges	14,827	(14,289)	(6,687)	(6,149)
Investment income	1,002	272	157	1,431
<b>(Loss) / Profit per operation</b>	<b>3,977</b>	<b>22,376</b>	<b>33,697</b>	<b>60,050</b>
Other Income	(616)	2,086	529	1,999
Administrative Expenses	(11,620)	(20,070)	(21,127)	(52,817)
Other expenses	(421)	(728)	(766)	(1,915)
<b>(Losses) / Profit before taxation</b>	<b>(8,680)</b>	<b>3,664</b>	<b>12,334</b>	<b>7,316</b>

## 2009

	LIFE	MOTOR THIRD PARTY LIABILITY	OTHER NON-LIFE	TOTAL
Gross Written Premiums	55,658	80,293	89,323	225,274
Reinsurance Premiums	(1,338)	(823)	(26,245)	(28,406)
Commissions paid	(7,809)	(8,882)	(6,530)	(23,221)
Claims paid to policyholders	(53,555)	(49,480)	(18,416)	(121,451)
Technical reserves charges	14,324	(24,623)	(11,457)	(21,756)
Investment income	10,858	3,259	1,887	16,004
<b>(Loss) / Profit per operation</b>	<b>18,138</b>	<b>(256)</b>	<b>28,562</b>	<b>46,444</b>
Other Income	2,304	640	787	3,731
Administrative Expenses	(11,693)	(11,146)	(13,704)	(36,543)
Other expenses	(4,575)	(3,382)	(7,956)	(15,913)
<b>(Losses) / Profits before taxes</b>	<b>4,174</b>	<b>(14,144)</b>	<b>7,689</b>	<b>(2,281)</b>

## 41. TRANSACTIONS WITH ASSOCIATED COMPANIES

The Company is controlled by the Agricultural Bank S.A., which holds 100% of its equity.

For the Company, its parent company AGRICULTURAL BANK OF GREECE S.A. (ATEbank), its subsidiaries and associate companies along with other ATEbank group companies are all considered as associated parts.

The Company's transactions with the associated parts are as follows:

### GROUP 2010

DESCRIPTION	RECEIVABLES	LIABILITIES	INCOME	EXPENSES
A ATEbank	72,854	(1,338)	12,153	(6,551)
B Other ATEbank group companies	537	(371)	2,483	(685)
<b>Total</b>	<b>73,391</b>	<b>(1,709)</b>	<b>14,636</b>	<b>(7,236)</b>

### 2009

DESCRIPTION	RECEIVABLES	LIABILITIES	INCOME	EXPENSES
A ATEbank	82,117	(707)	10,586	(3,407)
B Other ATEbank group companies	268	(142)	3,165	(1,917)
<b>Total</b>	<b>82,385</b>	<b>(849)</b>	<b>13,751</b>	<b>(5,324)</b>

All Company transactions with its subsidiaries have been omitted and are not included in the above statement.

**PARENT COMPANY  
2010**

DESCRIPTION	RECEIVABLES	LIABILITIES	INCOME	EXPENSES
A ATEbank	72,854	(1,338)	12,153	(6,551)
B Other ATEbank group companies	537	(371)	2,483	(685)
<b>ATE Insurance consolidated companies</b>				
C 1. ATE Mutual Funds	82	(29)	299	-
2. ATE Securities AEPEY	-	(3)	287	(39)
3. ATE Insurance Romania S.A.	28	-	167	(32)
<b>Total</b>	<b>73,501</b>	<b>(1,741)</b>	<b>15,389</b>	<b>(7,307)</b>

**2009**

DESCRIPTION	RECEIVABLES	LIABILITIES	INCOME	EXPENSES
A ATEbank	82,117	(707)	10,586	(3,407)
B Other ATEbank group companies	268	(142)	3,165	(1,917)
<b>ATE Insurance consolidated companies</b>				
C 1. ATE Mutual Funds	77	(20)	269	(1)
2. ATE Securities AEPEY	29	(4)	169	(40)
3. ATE Insurance Romania S.A.	19	(2)	223	(74)
<b>Total</b>	<b>82,510</b>	<b>(875)</b>	<b>14,412</b>	<b>(5,439)</b>

All Company's transactions with members of the board of Directors or members of Management are shown in the following table:

**TRANSACTIONS WITH MEMBERS OF BOARD OF DIRECTORS AND MANAGEMENT**

DESCRIPTION	GROUP		COMPANY	
	01/01/2010 31/12/2010	01/01/2009 31/12/2009	01/01/2010 31/12/2010	01/01/2009 31/12/2009
Management's remunerations	1,150	1,180	1,025	1,034
Other Management's expenses	101	81	101	81

**AUDITORS' REMUNERATIONS (L.3756/2009)**

DESCRIPTION	GROUP		COMPANY	
	2010	2009	2010	2009
Annual Audit	150	199	140	136
Remunerations of related executives	10	52	10	20

## 42. MINIMUM CAPITAL REQUIREMENT AND SOLVENCY LEVEL

The Minimum Capital Requirement and the Solvency Margin were calculated in accordance with the existing insurance law.

DESCRIPTION	GROUP		COMPANY	
	12/2010	12/2009	12/2010	12/2009
Minimum Capital Requirement	19,000	19,000	12,000	12,000
Solvency Capital Requirement (SCR)	56,415	54,597	49,415	45,343
Available Solvency Capital (A.S.C.)	118,644	58,225	118,644	58,225
Total Equity	20,144	33,115	21,474	35,441

The Company has Solvency Margin Adequacy (S.M.A.) in accordance with the requirements defined by the applicable law.

The Company's Solvency Margin for December 2009 that appears higher amounting to € 58,225, has been calculated without using the provision of L. 3867/2010 which provides for years 2009 and 2010 that the acquisition cost of Greek bonds may be taken into consideration rather than their current value. The calculation of December 2010 of € 118,644 was carried out based on the provisions of the aforesaid law. Without these provisions the A.S.C. would be short of SCR by approximately € 58,300.

The Company's A.S.C. according to the related document of the Private Insurance Supervisory Committee (12040/2.9.2010) for the total of insurance operations dated December 31st, 2009 was calculated at € 39,190. According to the Company's new calculation in answer to the above document and taking into consideration L. 3867/2010, this amount of A.S.C. is sufficient for the achievement of the SCR as during the first calculation elements improving the A.S.C. by € 49,865 had not been taken into account.

The Solvency Margin audit for the year that ended on December 31st, 2010 has not been carried out to date, therefore the related amount appearing in the table above pertains to the Company's calculations.

### 43. INSURANCE PLACEMENT

The Company has committed the following assets for insurance placement:

#### 2010

DESCRIPTION	OTHER NON LIFE	MOTOR THIRD PARTY LIABIL.	LIFE	UNIT LINKED	DAF	TOTAL
Real Estate	29,535	64,024	6,499	-	-	100,058
Investments	33,896	120,984	228,338	23,399	49,030	455,647
Receivables	12,300	11,700	2,525	-	-	26,525
Reinsurers' Share	12,461	649	-	-	-	13,110
Deferred acquisition costs	3,297	3,310	2,600	-	-	9,207
Loans secured	-	-	5,537	-	-	5,537
Accrued interest	674	2,187	6,610	-	1,438	10,909
Cash and cash equivalents	632	8,119	2,417	831	-	11,999
<b>Total</b>	<b>92,795</b>	<b>210,973</b>	<b>254,526</b>	<b>24,230</b>	<b>50,468</b>	<b>632,991</b>

#### 2009

DESCRIPTION	OTHER NON LIFE	MOTOR THIRD PARTY LIABIL.	LIFE	UNIT LINKED	DAF	TOTAL
Real Estate	29,271	64,754	7,161	-	-	101,186
Investments	22,150	96,263	217,942	24,991	44,350	405,696
Receivables	11,775	9,890	3,875	-	-	25,540
Reinsurers' Share	11,766	683	-	-	-	12,449
Deferred acquisition costs	4,349	3,407	2,670	-	-	10,426
Loans secured	-	-	6,044	-	-	6,044
Accrued interest	387	1,141	6,333	-	814	8,675
Cash and cash equivalents	14,935	4,399	22,809	2,082	-	44,225
<b>Total</b>	<b>94,633</b>	<b>180,537</b>	<b>266,834</b>	<b>27,073</b>	<b>45,164</b>	<b>614,241</b>

## 44. CONTINGENT LIABILITIES AND BELATED EVENTS

### CASES UNDER LITIGATION

The Company is involved (either as a defendant or as a prosecutor) in various litigation cases and arbitration procedures in the framework of its regular operation. The Management and the Legal Department of the Company estimate these cases to be resolved without any material effect on the financial position of the Company or its operation.

The Company has made provision of € 2.2 million for third party claims, including labor cases against the Company, according to the estimations of the Administration and its Legal Advisors.

### GUARANTEES

On December 31st, 2010, the Company had the following contingent liabilities:

- Guarantee letters for good execution of a total of € 4,177 concerning participation in competitions for the coverage of new insurance contracts in various companies.

## 45. POST BALANCE SHEET EVENTS

Further to the already mentioned events, there are no events after the balance sheet date that are related to the Company and should be mentioned in accordance with the International Accounting Standards.

# 4. DATA AND INFORMATION FOR THE PERIOD FROM 01/01 to 31/12/2010



MEMBER OF ATEBANK GROUP

AGROTIKI INSURANCE S.A.

Register Nr.: 12821/05/B/86/1 HEAD OFFICE: NEA SMYRNI ATTICA

**FINANCIAL STATEMENTS AND INFORMATION FOR THE PERIOD FROM JANUARY 1, 2010 to DECEMBER 31, 2010**

(published in accordance to article 135, of the C.L. 2190/20, for the corporations compiling financial statements, consolidated or not, in accordance with International Accounting Standards I.A.S.)

The data and information below, derive from the financial statements, on December 31, 2010 and aim to a general presentation of the financial position and results of AGROTIKI INSURANCE S.A. ("The Company"). Therefore, we recommend to the reader, before any investment decision or transaction is performed with the Company, to visit the Company's web site, where the financial statements as well as the auditor's report are available.

## COMPANY INFORMATION

Company Address: Nr. 163, Syggrou Av., GR 171 21, Nea Smyrni

Registration of Incorporated Companies Nr.: 12821/05/B/86/1

Supervising Authority: Bank of Greece

Board of Directors: Chairman : Th. Pantalakis, Vice Chairman : K. Philippou , Managing Director: I. Hadjioussif

Members : I. Papanikos , I. Paggelos, Ph. Samaras, G. Sykamtas, D. Damianos, Th. Plakos

Date of approval of the financial statements by the Board of Directors (from which the data and elements have been compiled):

Auditor's name: March 29th, 2011

Auditor's firm: Michael Kokkinos (SOEL Reg. No 12701)

Type of auditor's audit report : KPMG Certified Auditors SA Accountant

Company's Web Address: In assent

http://www.ateinsurance.gr

## BALANCE SHEET

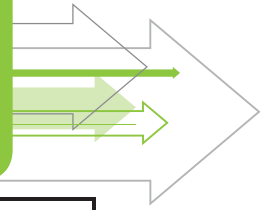
Amounts in thousands €

	GROUP			COMPANY		
	31.12.2010	31.12.2009	31.12.2010	31.12.2010	31.12.2009	
<b>ASSETS</b>						
Property, plant and equipment	83.764	84.044	83.749	84.031		
Investments in real estate	7.404	7.533	7.404	7.533		
Intangible assets	75	18	*	*		
Financial assets at fair value through profit and loss	3.846	5.950	3.846	5.950		
Financial assets available for sale	107.106	345.213	107.106	345.213		
Investments held to maturity	288.035	21.862	288.035	21.862		
Investments in subsidiaries and associate companies	*	10.381	8.272	19.036		
Premiums receivables	59.953	56.235	59.936	56.168		
Reinsurers' receivables	34.949	35.564	34.949	35.564		
Other assets	155.777	172.759	148.743	166.385		
<b>TOTAL ASSETS</b>	<b>740.909</b>	<b>739.559</b>	<b>741.940</b>	<b>741.742</b>		
<b>EQUITY AND LIABILITIES</b>						
Liabilities due to reinsurance operations	14.539	10.378	14.447	10.354		
Provisions / Other liabilities	42.001	37.678	41.861	37.602		
<b>Total Liabilities (a)</b>	<b>56.540</b>	<b>48.056</b>	<b>56.308</b>	<b>47.956</b>		
Life insurance mathematical reserves	250.432	269.304	250.426	269.304		
Provisions for outstanding claims	80.767	76.716	80.764	76.716		
Unearned Premiums	79.445	79.167	79.445	79.167		
Liabilities from investment insurance contracts	5.891	5.793	5.891	5.793		
Other insurance provisions	664.225	658.388	664.158	658.345		
<b>Total Insurance provisions (b)</b>	<b>40.978</b>	<b>40.978</b>	<b>40.978</b>	<b>40.978</b>		
Share Capital	-20.871	-7.898	-19.504	-5.537		
Other equity accounts	20.107	33.080	21.474	35.441		
Equity attributable to equity holders ©	37	35	*	*		
Minority interest (d)	20.144	33.115	21.474	35.441		
<b>Total Equity (e) = (c) + (d)</b>	<b>740.909</b>	<b>739.559</b>	<b>741.940</b>	<b>741.742</b>		
<b>TOTAL EQUITY AND LIABILITIES (a + (b) + (e))</b>						

## INCOME STATEMENT

Amounts in thousands €

	GROUP			COMPANY		
	01.01 - 31.12 2010	01.01 - 31.12 2009	01.01 - 31.12 2010	01.01 - 31.12 2009		
Accrued gross premiums and related income	239.391	211.356	239.907	211.315		
Less: Reinsurance production	-28.838	-28.513	-28.611	-28.406		
Less: Commissions and production expenses	-26.398	-23.061	-26.461	-23.221		
Less: Claims paid - Retention	-124.645	-121.466	-124.631	-121.451		
Changes in mathematical and other reserves - Retention	-578	-7.796	-586	-7.797		
Net income from insurance investments	1.910	16.813	1.431	16.004		
<b>Profit from insurance (a)</b>	<b>60.842</b>	<b>47.343</b>	<b>60.049</b>	<b>46.444</b>		
Other income	2.042	3.731	1.989	3.731		
Operating expenses	-53.512	-37.184	-62.817	-36.544		
Other expenses	-1.915	-15.912	-1.915	-15.912		
Profit / (Loss) from associated companies	20	635	*	*		
<b>Profits / (Losses) before taxes</b>	<b>7.477</b>	<b>-1.387</b>	<b>7.316</b>	<b>-2.281</b>		
<b>Losses after taxes (A)</b>	<b>-2.507</b>	<b>-5.079</b>	<b>-2.661</b>	<b>-5.932</b>		
-Company Shareholders	-2.509	-5.080	-2.661	-5.932		
-Minority interest	2	1	*	*		
<b>Other comprehensive income after taxes (B)</b>	<b>-11.543</b>	<b>3.938</b>	<b>-11.306</b>	<b>4.118</b>		
<b>Total comprehensive income after taxes (A) + (B)</b>	<b>-14.050</b>	<b>-1.141</b>	<b>-13.967</b>	<b>-1.815</b>		
-Company Shareholders	-14.052	-1.142	-13.967	-1.815		
-Minority interest	2	1	*	*		
<b>Profits / Losses before taxes per share - basics (in €)</b>	<b>0.0918</b>	<b>-0.1859</b>	<b>0.0974</b>	<b>-0.2172</b>		
Proposed Dividend	*	*	*	*		



	GROUP		COMPANY	
	31.12.2010	31.12.2009	31.12.2010	31.12.2009
Amounts in thousands €	33,115	34,256	35,441	37,256
<b>Total equity at beginning of year (1.1.2010 and 1.1.2009 respectively)</b>				
Total comprehensive income after taxes (continuous and discontinued operations)	-14,050	-1,141	-13,967	-1,815
Changes of rights in associated companies	1,077			
Change in minority rights	2			
<b>Total equity at end of year (31.12.2010 and 31.12.2009 respectively)</b>	<b>20,144</b>	<b>33,115</b>	<b>21,474</b>	<b>35,441</b>

## CHANGES IN EQUITY

## CASH FLOW STATEMENT

	GROUP		COMPANY	
	01.01-31.12.2010	01.01-31.12.2009	01.01-31.12.2010	01.01-31.12.2009
Amounts in thousands €	11,914	21,039	11,297	21,969
Total inflows / (outflows) from operating activities (a)	-18,029	4,538	-18,266	3,611
Total inflows / (outflows) from investing activities (b)	847	134	847	134
Total inflows / (outflows) from financing activities (c)				
<b>Net increase / (decrease) in cash and cash equivalents of the period (a) + (b) + (c)</b>	<b>-5,268</b>	<b>25,711</b>	<b>-6,122</b>	<b>25,714</b>
Effect of exchange rate fluctuations on cash and cash equivalents	-237	-180		
<b>Total cash inflows (outflows) of the period</b>	<b>-5,050</b>	<b>25,531</b>	<b>-6,122</b>	<b>25,714</b>
Cash and cash equivalents at beginning of the period	89,768	64,237	83,420	57,706
<b>Cash and cash equivalents at end of the period</b>	<b>84,263</b>	<b>89,768</b>	<b>77,298</b>	<b>83,420</b>

**ADDITIONAL DATA AND INFORMATION**

1. The accounting principles adopted by the Company under International Financial Reporting Standards (IFRS) as presented in detail at 31.12.2010, have been met.

2. The Company has complied with its legal obligation for covering the insurance reserves and solvency margin as of 31.12.2010. Obligations on insurance placements, as of 31.12.2010, amounts to € 621.9 million and total freezing of assets to € 633.0 million (Letter to Bank of Greece with protocol number 532/23.3.2011). Commentary on the calculation of solvency margin is made in note 42.

3. The Company has been audited by the tax authorities for all years until 2007. Notes on this fact and on the non audited years of the Group's Companies are found at note 1 of the financial statements.

4. The provisions that have been formed for each of the following cases are: a) For the non tax audited years of the Group and the Company, € 200 thousand and € 200 thousand respectively b) for litigious and doubtful receivables for the Group and the Company, € 11,229 thousand and € 11,229 thousand respectively c) for "Other provisions" which refers to personal retaining obligations for the Group and the Company, € 5,370 thousand and € 5,347 thousand respectively and d) for third party claims including labor cases against the Company amounting to € 2,250 thousand.

5. The Group's companies along with their mailing addresses and the voting rights percentages held by the parent Company that are consolidated in the consolidated financial accounts and the Board of Directors, are stated in details at note 27 of the financial statements.

6. The Group's and the Company's income and the expenses that have been recorded from transactions with members of the management and the Board of Directors, in the concept of IAS 24, for the period 01.01.2010 to 31.12.2010 and the balances of their receivables and payables as of 31.12.2010, have as follows:

	GROUP		COMPANY	
	01.01-31.12.10	31.12.09	01.01-31.12.10	31.12.09
(Amounts in thousand of €)	14,636	15,389		
Income	7,236	7,307		
Expenses	72,391	73,506		
Receivables	1,709	1,741		
Liabilities	1,150	1,025		
Transactions with members of B.O.D. and management	101	101		
Receivables from management	-	-		
Liabilities to management	-	-		

7. The other comprehensive income after taxes of the Group and the Company are analyzed as following (in thousands€)

	GROUP		COMPANY	
	01.01-31.12.10	31.12.09	01.01-31.12.10	31.12.09
Profit / Losses from the evaluation / sale of securities available for sale	-3,478	5,699	-3,478	5,699
Tax attributable to differences recorded directly to equity	-7,828	-1,581	-7,828	-1,581
Foreign exchange differences	-237	-180	-	-
Other comprehensive income after taxes	-11,543	3,938	-11,306	4,118

8. The number of the Company's employees on 31.12.2010 and 31.12.2009 was 288 and 376 respectively. The number of the Group's employees on 31.12.2010 and 31.12.2009 was 305 and 390 respectively.

9. There are no lien on Company's fixed assets.

10. There are no litigious differences of differences under arbitration, which could have an important impact on the Company's financial situation or operation.

11. The Company's financial statements and those of its subsidiaries are included in the consolidated financial accounts of the Group "AGRICULTURAL BANK OF GREECE" which is based in Greece and as of August 9th, 2010 it possesses 100% of the Company's percentage of shares.

12. The Company or its subsidiaries do not hold own shares.

13. With the decision of the Board of Directors of the Securities' Commission on October 8th 2010 the Company's application for exit from Athens Stock Exchange was approved.

14. There is no other essential information for the reader of the Financial Statements as far as the financial condition and course of the Group's activities until their date of publication is concerned.

<p>THE CHARMAN OF THE BOARD OF DIRECTORS THEODOROS N. PANTALAKIS (ID Nr.: AE-119288)</p>	<p>THE VICE PRESIDENT OF THE BOARD OF DIRECTORS KONSTANTINOS D. FILIPPOU (ID Nr.: L-043812)</p>	<p>THE CHIEF FINANCIAL OFFICER EVANGELOS K. ARCHONTOULIS (OEE SN Nr.: 10630 - A' CLASS)</p>	<p>THE ACTUARY GEORGIOS D. KRAVVARITIS (ID Nr.: AE-486482)</p>
<p>N. Smyrni, March 29th, 2011</p>			





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