



Bank of Cyprus Public Company Ltd

Pillar 3 disclosures for the year ended 31 December 2008

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1. Introduction

Bank of Cyprus Public Company Ltd ('the Bank', 'the Company') is the holding company of the Bank of Cyprus Group ('the Group'). The principal activities of the Group are the provision of banking, financial services and insurance business.

This report has been prepared in accordance with the requirements of the Directive to banks for the calculation of the capital requirements and large exposures of banks of 2006 and 2007 ('the Directive') issued by the Central Bank of Cyprus ('CBC'). The Directive implements the European Union's Capital Requirements Directive ('CRD')^a.

The Directive describes the Basel II framework which is based on three pillars:

- Pillar 1 has to do with the standards that set out the minimum regulatory capital requirements that are required for credit, market and operational risk
- Pillar 2 covers the Supervisory Review Process which assesses the internal capital adequacy processes. Banks and Supervisors have to evaluate and assess whether a bank should hold additional capital against risks not covered in Pillar 1
- Pillar 3 (Market discipline) covers transparency and the obligation of banks to disclose meaningful information to the market related to their risks, capital and generally risk management.

The Bank's Pillar 3 disclosures below have been prepared using 31 December 2008 data in accordance with the Directive.

1.1 Scope of Application

The requirements of the Directive, apply to the Group on a consolidated basis, as well as to the following companies on an individual basis:

- Bank of Cyprus Public Company Ltd
- Mortgage Bank of Cyprus Ltd

The Group makes use of the provisions laid down in paragraph 13 of unit A of the Directive in relation to the exemption of banking subsidiaries from its requirement to submit returns on an individual basis in the case of Mortgage Bank of Cyprus Ltd ('MBOC').

The Group also successfully applied to the Central Bank of Cyprus for the inclusion of the Kyrou Leasing S.A. in the solo calculation of the Bank of Cyprus Ltd, on the grounds that the conditions as laid down in paragraph 14 of Unit A of the Directive are satisfied.

Kyrou Leasing S.A. is therefore included in the calculation of the capital requirements of Bank of Cyprus Public Company Ltd.

Differences in the basis of consolidation for financial reporting and prudential purposes

For financial reporting purposes, all subsidiaries are fully consolidated. However, for prudential purposes, the book value of the Group's insurance subsidiaries, as well as its property and hotel business subsidiaries, is deducted from the capital base. The treatment for accounting and prudential purposes of the various Group entities is presented in Appendix 1 (p.29) of the report.

^a The Capital Requirements Directive (CRD) constitutes the following two directives:

- Directive 2006/48/EC relating to the taking up and pursuit of the business of credit institutions; and
- Directive 2006/49/EC on the capital adequacy of investment firms and credit institutions.

2. Risk Management Objectives and Policies

2.1 Risk Management Organisation

Risk is inherent to the Group's business and activities. The Group's ability to identify, measure, monitor and manage each type of risk to which the Group is exposed is an important factor in its financial stability, performance, reputation and to the achievement of its strategic objectives.

Risk Management Framework

This framework provides a comprehensive approach for the Group for identifying, measuring, monitoring and managing each type of risk to which the Group is exposed.

The Group operates in a complex and dynamic international environment and risk is inherent to its business and activities. The implementation of a robust and transparent risk management process is increasingly important in order for the Group to adapt and meet challenges in a structured way so it can continually align its strategy and business objectives against a background of changing risk and uncertainty.

The risk management framework has been developed to:

- ensure that the primary objective of the risk management process is achieved. This is to ensure that a level of capital adequacy is maintained so that the total risk taken across the Group is no greater than the Group's ability to absorb losses
- allow the Group to proactively manage its risks in a systematic and structured way and to continually refine its processes to reduce its risk profile and ultimately its capital requirements
- ensure appropriate strategies are in place to mitigate or transfer risks
- embed the risk management process and ensure it is an integral part of the Group's process of strategic decision making and capital planning
- help create a risk awareness culture at all levels within the Group
- engage the Group management's attention to the management, monitoring, reporting and reviewing of identified risks as well as considering new and emerging risks on a continuous basis.

Risk Management Process

The risk management process is integrated within the organisation through established internal policies, systems, controls and comprehensive reporting, commensurate with the complexity of the Group's activities and structure. The system of internal controls provides reasonable assurance for the effectiveness and efficiency of operations, the reliability of financial reporting and compliance with applicable laws and regulations. The risk management process provides for the continuous monitoring of the system of internal controls to ensure its effectiveness.

The Group Risk Management Unit is organised into three divisions for credit, market and operational risk management which report to the Group General Manager Risk Management ('GGMRM'). The three divisions, each one for its own discipline, are responsible for the following functions within the risk management framework:

- Facilitation of policy setting in line with the strategic and business objectives.
- Development of the framework for the appropriate risk governance.
- Co-ordination of risk management activities within the Group.
- Development of risk measurement and monitoring tools.
- Assessment and aggregation of all material risks to ascertain the Group's overall risk position.
- Development of capital adequacy assessment models.

Through the realisation of the above, it is expected that both the losses arising from these risks and the relevant capital requirement, will be reduced. In addition, each Division is responsible for ensuring that the Group complies with the Directive in its respective area.

Risk Governance and ownership

The risk governance structure is based on a three line of defence model, which is described below:

- The first line of defence comprises of management and staff who have the risk ownership and the immediate responsibility of day-to-day risk management. It includes the Bank's Board of Directors, Group Chief Executive, Group Executive Risk Committee and the Group Chief General Manager who have the primary responsibility for the management of risk. It also includes the Business Unit /Country Managers, Division managers and the staff of the units/ divisions.
- The second line of defence comprises of the Board Risk Committee, the Group General Manager Risk Management, the three Group Risk Management Divisions and the local Country Risk Management functions. Their role is to provide risk oversight and independent and objective challenge to the first line of defence.
- The third line of defence comprises of the Board Audit Committee and Group Internal Audit, who provide independent assurance over the integrity and effectiveness of the risk management framework throughout the Group.

Risk related issues are reported to the Group Executive Risk Committee comprising of the following members:

- A. Eliades – Group Chief Executive Officer
- Y. Kypri – Group Chief General Manager
- A. Jacouris – Group General Manager International Business & Operations
- V. Shiaryl – Group General Manager Domestic Banking
- C. Hadjimitsis – Group General Manager Finance and Strategy
- N. Karydas – Group General Manager Risk Management
- I. Seiradakis – General Manager Bank of Cyprus Greece
- A. Jacovides – Manager Group Operational Risk Management

The Group Executive Risk Committee convenes quarterly. Risk management committees also operate within the banking entities in Greece, the UK and Australia.

Market risks are reviewed at least monthly by the Group Asset and Liability Committee (ALCO). Group ALCO approves the policies and limits relating to management of market and other treasury related risks (such as liquidity risk and counterparty credit risk). At its monthly meeting, the Group ALCO views consolidated reports that indicate the Group's liquidity position and exposure to market risks.

The Board Risk Committee which convenes at least quarterly ratifies all major policies and limits.

The Group's strategies and processes for managing risks, as well as the measurement systems used and the hedging and mitigating strategies are analysed below by risk division.

2.2 Credit Risk Management

Credit risk is the risk that one party to a financial instrument will cause a financial loss to the other party by failing to discharge an obligation.

The Group places great importance on the effective management of credit risk. Credit risk is monitored through various control mechanisms across the Group in order to prevent undue risk concentrations and to price facilities and products on a risk-adjusted basis. This is achieved through a combination of highly trained and specialised personnel and appropriate systems, through which the creditworthiness of existing and new customers is assessed and the pricing of credit facilities is determined.

The credit risk exposure of the Group is diversified both geographically and across the various sectors of the economy.

During 2008 considerable progress was made in the development of an integrated system for the measurement and management of credit risk across the Group's entire loan portfolio.

Measurement and Assessment

The Group Credit Risk Management unit defines the Group's credit dispensing policies and monitors compliance with the relevant credit sanctioning procedures and controls applicable to each business line (consumer, business and corporate) and to each geographical area where the Group operates. Credit exposures from related accounts are aggregated and monitored on a consolidated basis.

The Group Credit Risk Management unit sets targets and limits for the composition and quality of the loans and advances portfolio and monitors compliance with them. The assessment of the quality of the portfolio is carried out using credit rating and credit scoring systems to determine the creditworthiness of customers.

Portfolio monitoring is carried out on the basis of customers' creditworthiness, sector of the economy and country of operation. Regular audits are carried out by a specialist unit of the Group Internal Audit Division.

One important aspect of credit risk management is the development of new and the constant upgrading of existing systems for the assessment of the creditworthiness of Group customers.

In the SME and Corporate Banking sectors, during 2008 the new upgraded version of the Integrated Rating System was completed. This system uses a common base (the Moody's Risk Advisor (MRA) system platform) for the credit risk assessment of both the SME and Corporate sectors. During 2009, this new upgraded version will be formally applied based on the new web based version of MRA - Risk Analyst.

The aim of this new system is to facilitate more accurate calculations of a customer's creditworthiness as well as the calculation of the overall credit risk. Specifically, the Borrower Rating will be calculated; that is an assessment of the creditworthiness of the customer, which is based on the business' financial information, the quality of management, market trends/outlook, the behavior of the business' bank accounts and the bank accounts of the guarantors/ owners of the business. The Transaction Rating will then be calculated taking into account all relevant factors, including any security.

The implementation of this new system will enable the more effective forecast of the level of any future provisions for bad and doubtful debts as well as the level of the required capital based on the relevant regulations of the supervisory authorities.

The objective is to use this application in a way that will comply with the provisions of Basel II and to allow the Group to adopt the IRB approach for credit risk as soon as possible.

Loan Sanctioning Policy

The Group has set specific limits for the various loan approval levels, which are exercised by qualified officers or committees within a predefined framework. There are also appropriate credit risk policies for each market/sector based on an evaluation of the credit risk and changing economic environment. Specific guidelines for the sound growth of the Group's loan portfolio are given by the Credit Risk Policy Management Department on a regular basis. Relevant instructions are also issued to ensure that, as far as possible, loans are properly priced on an individual customer basis. The relevant CBC guidelines are also taken into account which include Lending Guidelines for the acquisition of immovable property including residential property.

Efficient Management, Monitoring and Control of Customer Advances

The ultimate objective of the efficient management of the Group's advances portfolio is to enable prompt corrective action to be taken as soon as arrears/irregularities appear on customer debit accounts, so as to restrict loan impairment. In this context, an integrated, automated collection/settlement system is used for the timely handling of overdue debit accounts in the retail sector. At the same time, all loan portfolios are closely and systematically monitored and controlled centrally by specialised Group departments, as well as regionally by the Business/Corporate Centres, and where necessary appropriate prompt corrective action is taken. Recoveries accounts are also handled effectively at both central and regional level.

The recent economic crisis is expected to directly or indirectly adversely affect vital sectors of the Cypriot economy especially those of tourism and property development. However, the quality of the Group's loan portfolio is not expected to be affected drastically due to the prudent lending policy that is applied to all sectors and to all geographic areas in which the Group operates.

The lending criteria that the Group has set, especially in the property sector (mainly the Loan to Value Ratio), are even stricter than the minimum lending criteria that have been set by the Central Bank of Cyprus. In view of the economic crisis, the Group's lending criteria mentioned above have been already made stricter where it was considered appropriate and will keep being revised in due time according to the changing circumstances of the economy.

Credit Risk with correspondent Banks and Countries

Group Market Risk Management ('GMRM') is responsible for the credit risk that the Group has with correspondent banks and countries. During 2008, as a result of the financial crisis and the problems faced by many banks, the Group has significantly restricted both the number of banks with which it has limits, as well as the maximum duration of the transactions. The internal model that relied mostly on the bank's credit rating is no longer followed. Limits are allocated to those banks that have a significant share of their local market, strong financial position and high probability of obtaining support from the local government in case of difficulty. The financial developments, changes in ratings and other news are monitored daily and the limits are adjusted whenever considered necessary.

Policies for hedging and mitigating credit risk

The Group has implemented different methods in order to achieve effective mitigation of credit risk. Some of the most important methods are listed below:

- Determining which sectors of the economy the Bank is not willing to finance.
- Setting of sanctioning limits for all line Managers and Credit Committees.
- Setting of thresholds relating to Loan to Value ratios as well as procedures for taking collaterals especially residential/ commercial mortgage.
- Credit Scoring Rating for retail customers and MRA Credit Rating for corporate customers are linked with approval/ rejection criteria.
- Issuing circulars and guidelines concerning the granting of credit.
- Ad-hoc approvals of corporate clients' lending.

2.3 Market Risk Management

GMRM is responsible for measuring and monitoring the following risks at Group level:

- Market risk (mainly interest rate risk and exchange rate risk)
- Liquidity risk
- Credit risk with correspondent banks and countries

The Group ALCO sets out the policy for the management of these risks and approves the acceptable level of risk and limits, which are ratified by the Board Risk Committee.

The monitoring of these risks at local banking units is carried out by market risk officers in the various countries in which the Group operates, who report directly to GMRM which is responsible for monitoring market risk at Group level.

In 2009, it is expected that limits will be approved for the market risks of Uniastrum bank in Russia and the relevant reporting will be put in place for the monitoring of those risks.

Interest Rate Risk

Interest Rate Risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market interest rates. It arises as a result of timing differences on the repricing of assets and liabilities.

In order to control the risk from changes in interest rates, there are limits on the maximum reduction of net interest income, of each banking unit, that can take place each year, for the next three years. These limits have been set as a percentage of Group capital (1,5%) and as a percentage of Group net interest income (5%) and have been allocated to the various banking units in accordance with their contribution to net interest income. Small limits have also been set for open interest rate positions in the over three-year period.

During 2007, the Group began measuring the impact of a 2% change in interest rates on the economic value of the Group. The Group ALCO has set a maximum limit for this change equal to 10% of Group regulatory capital (calculated in accordance with CBC provisions).

Exchange Rate Risk

Exchange Rate Risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates.

In order to limit the risk of loss from adverse fluctuations in exchange rates, the Group ALCO has approved open position limits for each currency or group of currencies and for the overall open currency position. These limits are smaller than the maximum permissible by the CBC.

For the foreign exchange trading book (which operated only in Cyprus until the 16th of May 2008) the Group ALCO had approved daily and monthly stop loss limits, as well as Value at Risk ('VaR') limits. These limits were monitored daily by GMRM. Value at Risk is calculated using the variance/co-variance method with 99% confidence interval and a one-day holding period. Historical data on exchange rates over the last five years is used. During 2008, the realised losses did not exceed the Value at Risk on any day.

Liquidity risk

Liquidity Risk is the risk that the Group is unable to fully or promptly meet payment obligations and potential payment obligations as and when they fall due. This risk includes the possibility that the Group may have to raise funding at higher cost or sell assets at discount.

The Group's banking business requires a steady flow of funds both to replace existing deposits as they mature and to satisfy customer requests for additional borrowing. Undrawn borrowing facilities are also taken into consideration in managing the liquidity position.

Group assets are mainly funded by deposits. The distribution of sources and the maturity of deposits are actively monitored in order to avoid concentration of funding maturing at any point in time or from a small number of depositors. Moreover, the Group monitors the percentage of fixed deposits that are renewed every quarter and aims to ensure that this percentage is maintained at high levels. The Group relies almost exclusively on stable funding sources in order to finance illiquid assets.

Furthermore, liquidity is monitored daily by Group Market Risk Management. The responsibility for the management of liquidity rests with the treasury units at each location, in cooperation with Group Treasury.

GMRM monitors the Group's liquidity position and ensures adherence to the various limits (e.g. liquidity mismatch limits) set by the Group ALCO and the regulatory authorities in the countries where the Group operates. The Group ALCO approved the various assumptions and limits of two liquidity crisis scenarios: bank-specific crisis and market crisis.

The Group maintains at all times a diversified portfolio of highly liquid assets in the principal currencies in which it transacts. Furthermore the ratio of liquid assets to total liabilities falling due in the next twelve

months is monitored at Group level with the minimum acceptable ratio set at 25%. Liquid assets are defined as cash, interbank deposits maturing within thirty days and debt and equity securities at discounts prescribed by the regulatory authorities.

Policies for hedging and mitigating market risk

The Group aims to minimize market risks, through hedging. Only minimal open positions are allowed for both foreign exchange (FX) and interest rate risk.

FX risk is mostly hedged in the spot market. The Local Treasury departments outside Cyprus, hedge their position (arising out of customer transactions) with the Group Treasury in Nicosia and only transact with other market participants in limited cases (e.g. when there is a bank holiday in Cyprus). The Group Treasury in Nicosia then covers its FX position by entering into FX deals with other banks. Other instruments used to hedge FX risk include FX forwards and FX swaps.

Interest rate risk is also managed centrally at Group level. The Group Treasury either provides fixed rate funding to other banking units that grant fixed rate loans, or accepts fixed rate funding from banking units to hedge their fixed rate deposits. Interest rate risk is also hedged using interest rate swaps ('IRS') between the various banking units of the Group as well as with external counterparties. The Group also hedges a percentage of non-rate sensitive deposits, such as current accounts, by investing in fixed rate bonds (structural hedging).

Every month, GMRM carries out tests to ensure that hedges fulfill the objective for which they have been set up. For structural hedging the amount of structural hedging assets is compared to the amount that should be hedged (based on the level of deposits and the assumptions approved by the Group ALCO). The average tenor of hedging assets is also compared to the targeted average tenor, in order to ensure that hedging is within the Group ALCO approved parameters.

For over three year positions there are strict position limits. Any position not hedged is immediately identified since it violates the open position limits.

For cash flow hedges and fair value hedges that have been designated for hedge accounting in accordance with International Financial Reporting Standards, effectiveness is established both prospectively and retrospectively as per the requirements of the relevant standard.

2.4 Operational risk management

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people or systems, or from external events. It includes legal risk but excludes reputation and strategic risks. It is embedded in every business activity within the Group and its management involves the promotion of risk culture and awareness within the organisation as well as the establishment of control policies and procedures.

Potential losses from operational risks may occur in all the Group's activities as a result of inefficiency or failure of internal processes or systems caused either by external events or human error. Consequently, under the umbrella of operational risks a wide range of possible cases are included, which are not easily predictable. Nonetheless, with proper operational risk management it is possible to limit any adverse consequences.

The Group Operational Risk Management Division (Group ORM) employs specialised tools and methodologies for identifying, assessing and monitoring operational risk within the Group for the timely identification of any shortcomings. To this effect, the following activities are carried out:

- Collection of data on operational risk events. This data is utilised to improve the management of operational risks and where possible to prevent future losses. Currently, loss event data is collected from all Group entities worldwide, even though for the Ukraine and Russia operations a manual procedure has just been established. Regular reporting of the operational loss data events is made to the Group Executive Risk Committee, Board Risk Committee and the Central Bank of Cyprus.
- Risk identification and assessment within business units using the Risk Control Self Assessment (RCSA) Workshop methodology. This is a self assessment by the managers and personnel

involved (risk owners). Group ORM facilitates the three-stages of this process which are: a) analysis of core processes within business units, b) identification of key risks and the construction of risk maps and; c) formulation of action plans to implement controls for management of the key risks. The RCSA workshop process is being performed in Cyprus and Greece and soon will be applied to other entities of the Group.

- Collection of Key Risk Indicators (KRIs) through which there is an ongoing monitoring of the Group's operational risks at various departments. Regular reporting of these indicators is made to the Group Executive and Board Risk Committees. The process of enriching the Group's KRI library is ongoing.
- Assistance to the Group in relation to operational risk considerations at the introduction of new products and procedures.
- An education/training program is carried out throughout the Group with the aim of promoting the right culture and awareness in relation to operational risks and in this way enhance the control environment through employee behaviour and actions.
- Establishment of a network of operational risk management units in all the countries in which the Group is active. In addition a network of liaisons and correspondents is being established in Cyprus and Greece who will act as facilitators in the process of loss data collection, RCSA Workshops and personnel training.

Policies for hedging and mitigating operational risk

Part of the mitigation strategies that the Group follows, as far as operational risk is concerned, is having appropriate insurance coverage. This is being reviewed each year to ensure that the Group's needs are met.

The Group has developed a Business Continuity plan to ensure that services can resume immediately in the case of a disruption.

3. Own funds

The own funds of Bank of Cyprus Group as at 31/12/2008 were €2.379.443 thousand as shown below:

Original Own Funds (Tier 1)	€000
Share Capital	586.662
Share Premium	676.949
Reserves	570.180
Hybrid Capital Securities	174.315
50% of Book value of non-banking subsidiaries	(105.008)
Intangible Assets	(362.532)
Total Tier 1	1.540.566
Additional Own Funds (Tier 2)	
Revaluation Reserves	183.760
Subordinated Loan Stock	757.662
General Provision	2.463
50% of Book value of non-banking subsidiaries	(105.008)
Total Tier 2	838.877
Total own funds	2.379.443

The own funds for all subsidiaries, as at 31/12/2008, were in excess of the minimum required by the Directive.

3.1 Original Own Funds

Share Capital

As at 31/12/2008 the share capital of the Bank comprised of 586.662 thousand shares with a nominal value of €1,00 each.

Hybrid capital securities

Hybrid capital securities have no maturity date, but may be redeemed in whole at the option of the Bank, subject to the prior consent of the CBC, at their nominal amount together with any outstanding interest payments, five years after their issue date or on any interest payment date thereafter. The amount of €174.315 thousand included in original own funds consists of:

	€000
Capital Securities Series B	50.462
Capital Securities 12/2007	123.853
	174.315

Capital Securities Series B were issued in Cyprus pounds in March 2004 and are listed on the Cyprus Stock Exchange. They carry a floating interest rate, which is reset every three months. The interest rate is equal to the base rate of Bank of Cyprus Public Company Ltd at the beginning of each three-month period plus 1,00% per annum. Interest is payable quarterly. The Bank exercised its option to redeem in whole the Capital Securities Series B at par on 20 May 2009.

Capital Securities 12/2007 were issued in December 2007 in Cyprus pounds and are listed on the Cyprus Stock Exchange. Their interest rate is fixed at 6,00% per annum for the first six months and floating thereafter, equal to the three-month Euribor plus 1,25% per annum. Interest is payable quarterly. The Bank intends to apply to the relevant authorities for the listing of the Capital Securities 12/2007 on the Cyprus Stock Exchange.

Additional own funds

Subordinated loan stock

The subordinated loan stock issued by banking companies of the Group is not secured and the rights and claims of loan stockholders are subordinated to the claims of depositors and other creditors of the banking companies, but have priority over those of the shareholders of the Group.

The subordinated loan stock included in additional own funds amounted to €757.662 thousand and consists of:

		2008
	Contractual interest rate	€000
Subordinated Bonds 2011/2016 (€200 million)	Three-month Euribor plus 0,60%	186.138
Convertible Bonds 2013/2018 (€573 million)	7,50% until 30 June 2009 and six-month Euribor plus 1,00% thereafter	563.679
Subordinated Bonds in Ukrainian Hryvnia 12/2016	12,0%	1.788
Subordinated Bond in US Dollars 2013/2014/2015	2,5%	6.057
		757.662

Subordinated Bonds

The Company issued in May 2006 €200 million floating rate Subordinated Bonds 2011/2016 in Euro maturing in May 2016. The Company has the option to call the Bonds in whole during or after May 2011. The interest rate of the Bonds was set at the three-month Euribor plus 0,60% until May 2011 and will increase to plus 1,60% thereafter. The issue price of the Bonds was 99,861%. The Bonds are listed on the Luxembourg Stock Exchange. At 31 December 2008, the amount of the €200 million Subordinated Bonds 2011/2016 outstanding amounted to €187.748 thousand.

The Subordinated bonds denominated in Ukrainian Hryvnia maturing 31 December 2016 were issued by JSC AvtoZAZbank in May 2008.

The Subordinated Bonds in US Dollars 2013/2014/2015 were issued by CB Uniastrum Bank LLC. These bonds mature as follows: US\$ 2 millions on 31 December 2013, US\$ 2,5 million on 31 December 2014 and US\$ 2 million on 31 December 2015. Interest can be changed unilaterally by the lender at any time until maturity.

Convertible Bonds

In July 2008, the Company issued Convertible Bonds 2013/2018 in Euro, with nominal value of €573.410 thousand, maturing in June 2018. The Convertible Bonds bear a fixed interest of 7,50% per annum until 30 June 2009 and floating interest rate thereafter, set at the six-month Euribor plus 1,00% until June 2013 and plus 3,00% thereafter. The bonds can be converted to shares at the price of €10,50 per share. The conversion periods are between 15-31 March for years 2011-2013 and 15-30 September for years 2010-2012. The bonds may be redeemed at the option of the Company on or after September 2013, subject to the prior consent of the Central Bank of Cyprus. The Convertible Bonds are listed in Cyprus Stock Exchange.

Impediments to prompt transfer of funds between parent and subsidiaries

In the event of a crisis, the Bank may encounter difficulties in drawing dividends from the non-EU overseas subsidiaries, namely:

- Bank of Cyprus (Channel Islands) Ltd
- Bank of Cyprus Australia Ltd
- LLC CB 'Bank of Cyprus'
- CB Uniastrum Bank LLC
- OJSB Bank of Cyprus

This may be due to the possible insistence of local regulators for the maintenance of capital ratios well in excess of those required by the CBC for these subsidiaries.

Apart from the above, there are no current or foreseen material practical or legal impediments to the prompt transfer of own funds or repayment of liabilities among the parent company and its subsidiaries. Any distributions beyond the local capital adequacy requirements will be subject to local regulatory authorities' approval.

4. Minimum required own funds for credit, market and operational risk

4.1 Group's approach to assessing the adequacy of its internal capital

The different methods used to assess the adequacy of the internal capital for the different categories of risks are described below.

Standardised approach for credit risk

The necessary mechanism for the capital calculation with the Standardised Approach is implemented. The foundations have been laid for the implementation of the IRB foundation approach for Credit Risk.

The following table shows 8% of the risk-weighted group exposure amounts as at 31/12/2008 for each of the exposure classes specified in paragraph 23 of Unit A of the Directive.

	€000
Central governments or central banks	5.472
Regional governments or local authorities	388
Administrative bodies and non – commercial undertakings	509
Institutions	102.725
Corporate	870.116
Retail	482.423
Covered bonds	2.834
Securitisation positions	3
Other assets	43.323
	1.507.793

Minimum capital requirements for trading book activities

The minimum capital requirement calculated in accordance with paragraph 19(b) of Unit A of the Directive for trading book activities^b is as follows:

	€000
Traded debt instruments	2.962
Equity shares	220
Foreign Exchange	7.752
	10.934

Minimum capital requirements in relation to operational risk

The minimum capital requirement in relation to operational risk calculated in accordance with the Standardised Approach (paragraph 48 of Unit A of the Directive) amounts to €175.591 thousand.

5. Counterparty credit risk

As at 31 December 2008, the Group did not have securities or commodities lending or borrowing transactions, long settlement transactions or margin lending transactions outstanding. Hence, the section below only discusses the credit risk arising from derivative instruments.

5.1 Internal capital and credit limits for counterparty credit exposures

Limits for derivative transactions are assigned for a select number of counterparties, all rated A1 (by Moody's) or above. These limits are approved by the Group ALCO. As a result of the financial crisis and the problems that many banks face, during 2008 the Group restricted significantly the number of banks with which it has limits. The Group no longer follows the internal model that relied mostly on the bank's credit rating. Group Treasury requests additional limits when necessary. GMRM carries out an analysis and recommends to the Group ALCO limits for approval. It should be noted that limits are allocated to banks that have a significant share of their local market, strong financial position and high probability of obtaining support from their government in case of a problem.

The derivative limit (for the Expected Replacement Cost (ERC) of the contract), counts within the overall limit of the counterparty and is set at 15% of the total limit. There is also a limit for the maximum notional amount of contracts with each counterparty, which is 20 times the ERC limit.

^b Minimum capital requirements for trading book activities related to position risk, settlement risk and counterparty risk and where applicable concentration risk.

Credit risk arising from entering into derivative transactions with counterparties is measured using the mark-to-market method. According to this method, the current replacement cost of all contracts with positive amounts is obtained and an add-on is applied to this amount for potential future credit exposure, according to specific factors depending on the type of transaction and duration. This figure is used both for calculating the capital required for the credit risk of those transactions and for credit limit monitoring.

5.2 Policies for securing collateral and establishing credit reserves

At 31 December 2008, the Group had signed Credit Support Annexes ('CSAs') to the International Swaps and Derivatives Association ('ISDA') agreement with five counterparties out of eighteen (with which the Group has derivative limits). In 2009 it is expected that more such agreements will be entered into. As at the year-end, the threshold amounts in the CSA with Societe Generale were reached, and thus the Group has obtained collateral from the counterparty. In any case, all the counterparties with which we enter into derivative transactions are rated A1 and above.

5.3 Policies with respect to wrong-way risk exposures

This risk is not currently measured. It is not anticipated to be significant since a change in market rates (interest rates and FX rates which are the main underlying factors of our derivative transactions) is not expected to materially increase the probability of default (PD) of our counterparties. It should also be noted that since the Bank uses the standardised approach, it does not measure the PDs of counterparties.

5.4 Collateral the bank would have to provide given a downgrade in its credit rating

Currently the only instance where the Group would have to provide additional collateral in the event of a downgrade, involves derivative transactions under ISDA agreements, where a CSA has been signed. Out of the five agreements signed, only two such agreements in place provide for additional collateral in the event of a downgrade. In the event of an up to two notch downgrade, the amount of additional collateral to be provided amounts to €3,6 million (see Table below).

Increase in Collateral in the case of 2 notches downgrade in Rating (ISDA Agreements)				
Bank	Moody's Rating	Threshold Amount (USD million)	Threshold Amount (EUR million)	Difference (EUR million)
Goldman Sachs International	A2	15	10,7	3,6
	A3-Baa1	10	7,1	
Nomura International Plc	A1 to A3	n/a	15	0
	Baa1	n/a	15	

5.5 Gross positive fair value of contracts

The gross positive fair value of the Group derivative contracts (mainly IRS and FX contracts) is presented in the Table below. This is the total of the positive mark-to-market of all contracts (including net accrued interest). It should be noted that there are no legally enforceable netting agreements in place. The collateral agreements where in place have not yet reached the threshold amount (thus no collateral has been provided). Thus, the "Gross positive fair value" of the derivative contracts in place is equal to the "Net derivatives credit exposures".

	Gross Positive Fair Value as at 31 Dec 2008
	€000
Cyprus	115.841
Greece	22.786
UK	14.613
Group	153.240

5.6 Mark- to-market method and exposures

The mark-to-market of IRSs is calculated using the Bloomberg system. The methodology used is as follows:

- The fixed payments are calculated for all future payment dates based on the fixed rate of the IRS.
- The floating payments are also calculated for all future payment dates based on the rates implied by the forward curve.
- The net position of the fixed and floating payments is calculated and discounted to present value (PV) using the relevant discount factors.

FX forwards and FX swaps are marked to market as follows:

The forward leg of each contract is taken, and each currency is converted into EURO using the forward rate corresponding to the remaining period to the maturity date of the contract (i.e. the period between the valuation date and the maturity date). The difference between the EUR amount of the two currencies discounted to the valuation date using the risk free rate, is the profit or loss on the contract as follows:

If $PV(\text{EUR equivalent of purchase amount} - \text{EUR equivalent of sale amount}) > 0 \Rightarrow \text{profit}$

If $PV(\text{EUR equivalent of purchase amount} - \text{EUR equivalent of sale amount}) < 0 \Rightarrow \text{loss}$

The table below indicates the measures for exposure value under the mark-to-market methodology. The exposure values are calculated as the:

- The positive mark to market after taking into account the accrued interest and
- Add on amount, which is equal to a percentage of the nominal amount of each deal based on its duration.

Further to the above, an additional adjustment is made in order to capture the credit risk arising from the Group's IRS transactions. The calculation for this credit risk adjustment is performed as follows:

- Calculation of the mark to market plus accrued interest.
- Calculation of the average rating and average maturity of the Group's portfolio
- In the case where the result of the mark to market plus accrued interest is positive it is multiplied it with the relevant iTraxx default level (based on the average maturity of the portfolio already calculated) to arrive at the potential credit risk loss.

Exposures under mark-to-market method as at 31 Dec 2008	
	€000
Cyprus	
Institutions	134.052
Corporates	11.502
	145.554
Greece	
Institutions	33.495
Corporates	3.660
	37.155
UK	
Institutions	14.863
Corporates	72
	14.935
Group	
Institutions	182.410
Corporates	15.234
	197.644

6. Bank's exposure to credit risk and impairment risk

Past due loans and advances are defined as all loans and advances where the counterparty has failed to make a payment when it is contractually due.

At each balance sheet date the Group assesses whether there is any objective evidence that loans and advances are impaired. A loan is impaired if there is objective evidence of impairment as a result of one or more events that have occurred after the initial recognition of the loan (an incurred 'loss event') and that loss event (or events) has an impact on the estimated future cash flows of the loan or the group of loans, that can be reliably estimated.

For loans and advances to customers carried at amortised cost, the Group first assesses individually whether objective evidence of impairment exists for loans and advances that are individually significant. Furthermore, a collective impairment assessment is made for loans and advances that are not individually significant and for losses that have been incurred but are not yet identified relating to loans and advances that have been assessed individually and for which no provision has been made.

The collectability of individually significant loans and advances is evaluated based on the customer's overall financial condition, resources and payment record, the prospect of support from creditworthy guarantors and the realisable value of any collateral.

There is objective evidence that a loan is impaired when it is probable that the Group will not be able to collect all amounts due according to the original contract terms, unless such loans are secured or other factors exist whereby the Group expects that all amounts due will be collected.

If there is objective evidence that an impairment loss has been incurred, the amount of the loss is measured as the difference between the carrying amount of the loan and the present value of the estimated future cash flows (excluding future credit losses not yet incurred) including the cash flows which may arise from guarantees and tangible collateral, irrespective of the outcome of foreclosure. The carrying amount of the loan is reduced through the use of a provision account and the amount of the loss is recognised in the income statement. Loans together with the associated provisions are written off when there is no realistic prospect of future recovery. Loans are monitored continuously and are reviewed for impairment every six months. If, in a subsequent period, the amount of the estimated impairment loss decreases and the decrease is due to an event occurring after the impairment was recognised, when the creditworthiness of the customer has improved to such an extent that there is reasonable assurance that all or part of the principal and interest according to the original contract terms of the loan will be collected

timely, the previously recognised impairment loss is reduced by adjusting the impairment provision account. If a previously written-off loan is subsequently recovered, any amounts previously charged are credited in the income statement.

The present value of the estimated future cash flows is calculated using the loan's original effective interest rate. If a loan bears a variable interest rate, the discount rate used for measuring any impairment loss is the current reference rate plus the margin specified in the initial contract.

For the purposes of a collective evaluation of impairment, loans are grouped based on similar credit risk characteristics taking into account the type of the loan, geographic location, collateral type, past-due amounts and other relevant factors.

Future cash flows for a group of loans and advances that are collectively evaluated for impairment are estimated on the basis of historical loss experience for loans with similar credit risk characteristics to those of the group. Historical loss experience is adjusted on the basis of current observable data to reflect the impact of current conditions that did not affect the period on which the historical loss experience is based and to remove the impact of conditions in the historical period that do not currently exist. The methodology and assumptions used for estimating future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

6.1 Total amount of exposures

Credit exposure by type as at 31 Dec. 2008					
Type	Retail Customers	Corporate Customers	Financial Institutions	Governments and Local Authorities	Total
	€000	€000	€000	€000	€000
Bank Loans & Overdrafts	11.578.711	12.739.806	-	130.799	24.449.316
Acceptances, Endorsements & Documentary Credits	276.950	77.072	-	-	354.022
Guarantees	462.869	1.389.845	-	272	1.852.986
Unutilized Loan Commitments (undrawn loans and overdraft accounts)	1.240.202	2.718.307	-	1.165	3.959.674
Interbank Placements	-	-	4.702.076	736.993	5.439.069
Securities	-	110.210	2.172.153	1.956.266	4.238.629
Derivatives	-	11.065	142.175	-	153.240
Other	-	170.584	-	-	170.584
Total	13.558.732	17.216.889	7.016.404	2.825.495	40.617.520

6.2 Geographic distribution of the exposures

Credit Exposure by Geographical Area as at 31 Dec. 2008					
	Retail Customers	Corporate Customers	Financial Institutions	Governments and Local Authorities	Total
	€000	€000	€000	€000	€000
European Union:					
Cyprus	6.507.343	9.110.760	96.867	1.466.238	17.181.208
Greece	5.974.321	6.095.518	496.638	886.657	13.453.134
UK	534.673	883.400	954.975	145.790	2.518.838
Romania	43.766	69.764	-	-	113.530
Other	-	-	3.844.818	225.070	4.069.888
Rest of Europe:					
Russia	100.786	563.697	155.179	75.579	895.241
Ukraine	77.105	50.770	-	-	127.875
Australia & New Zealand	320.738	245.502	224.519	1.380	792.139
North America & Canada	-	26.894	770.722	-	797.616
Supranational	-	-	63.258	-	63.258
Other	-	170.584	409.428	24.781	604.793
Total	13.558.732	17.216.889	7.016.404	2.825.495	40.617.520

6.3 Distribution of the exposures by industry or counterparty types

Exposure broken down by NACE as at 31 Dec.2008					
Description	Retail Customers	Corporate Customers	Financial Institutions	Governments & Local Authorities	Total
	€000	€000	€000	€000	€000
Agriculture, Hunting	155.259	139.199	-	-	294.458
Fishing	10.140	36.141	-	-	46.281
Mining & Quarrying	53.169	89.336	-	-	142.505
Manufacturing	1.177.422	1.480.802	-	2.566	2.660.790
Electricity, Gas	31.147	61.888	-	-	93.035
Construction	1.028.373	3.328.189	-	-	4.356.562
Wholesale & Retail	129.121	3.071.145	-	-	3.200.266
Hotels & Restaurants	502.991	1.873.692	-	-	2.376.683
Transport	328.519	726.813	-	-	1.055.332
Financial Intermediation	358.080	804.295	-	-	1.162.375
Real Estate	1.321.845	3.835.366	-	-	5.157.211
Public Administration	11.835	10.328	-	2.822.929	2.845.092
Education	115.082	43.449	-	-	158.531
Health & Social Work	181.560	133.110	-	-	314.670
Personal Service Activities	1.264.035	648.671	-	-	1.912.706
Private Individuals	6.889.568	763.830	-	-	7.653.398
Financial Institutions	-	-	7.016.404	-	7.016.404
Territorial Organizations	586	51	-	-	637
Other	-	170.584	-	-	170.584
Total	13.558.732	17.216.889	7.016.404	2.825.495	40.617.520

6.4 Residual maturity breakdown of all the exposures

Credit Exposure by Maturity as at 31 Dec. 2008					
	Retail, Customers	Corporate Customers	Financial Institutions	Governments & Local Authorities	Total
	€000	€000	€000	€000	€000
Less than 1 year	4.355.917	6.891.684	5.195.904	1.265.006	17.708.511
1 to 5 years	1.719.179	2.986.293	1.416.728	834.590	6.956.790
5 to 10 years	5.894.344	4.731.886	365.048	592.562	11.583.840
More than 10 years	1.589.292	2.607.026	38.724	133.337	4.368.379
Total	13.558.732	17.216.889	7.016.404	2.825.495	40.617.520

6.5 Security breakdown

Credit exposure and value of security as at 31 Dec. 2008					
	Retail, Customers	Corporate Customers	Financial Institutions	Governments & Local Authorities	Total
	€000	€000	€000	€000	€000
Credit Exposure	13.558.732	17.216.889	32.509	9.809.390	40.617.520
Value of Security	(7.321.780)	(8.709.354)	-	(96.405)	(16.127.539)
Total Unsecured Credit Exposure	6.236.952	8.507.535	32.509	9.712.985	24.489.981

Although total credit exposure as at 31/12/2008 amounted to €40.617.520 thousand, only €24.449.316 thousand (net of provisions) relates to bank loans and overdrafts. For a full breakdown of credit exposure by type refer to section 6.1.

Security by type as at 31 Dec.2008					
	Retail Customers	Corporate Customers	Financial Institutions	Governments & Local Authorities	Total
	€000	€000	€000	€000	€000
Real Estate Property	6.440.600	7.690.158	-	5.552	14.136.310
Cash	430.404	453.546	-	406	884.356
Securities/ Bonds	132.279	188.394	-	85.409	406.082
Guarantees	26.102	238.148	-	11	264.261
Other Securities	292.395	139.108	-	5.027	436.530
Total	7.321.780	8.709.354	-	96.405	16.127.539

6.6 Impaired exposures and past due exposures

Impaired and past due loans and advances by geographical areas as at 31 Dec. 2008				
	Neither past due nor impaired	Past due but not impaired	Impaired	Total
	€000	€000	€000	€000
Cyprus	11.287.378	1.139.334	382.133	12.808.845
Greece	8.130.345	1.247.610	283.019	9.660.974
United Kingdom	959.057	121.634	24.227	1.104.918
Australia	372.267	38.946	-	411.213
Russia	819.176	53.444	81.370	953.990
Romania	72.005	539	2.163	74.707
Ukraine	99.454	13.672	9.457	122.583
	21.739.682	2.615.179	782.369	25.137.230

Provision for impairment of loans and advances by geographical area as at 31 Dec.2008				
	Cyprus	Greece	Other Countries	Total Provision for Impairment
	€000	€000	€000	€000
At 1 January 2008	387.629	181.036	10.342	579.007
Acquisition of subsidiaries	-	-	59.954	59.954
Exchange adjustment	-	1.400	(13.786)	(12.386)
Applied in writing off impaired loans and advances	(20.673)	(12.640)	(286)	(33.599)
Interest accrued on impaired loans and advances	(10.327)	(9.103)	(463)	(19.893)
Collection of loans and advances previously written off	23.230	-	-	23.230
Charge for the year	12.343	65.217	14.041	91.601
At 31 December 2008	392.202	225.910	69.802	687.914
Individual impairment	256.175	168.202	27.586	451.963
Collective impairment	136.027	57.708	42.216	235.951

7. The standardised approach

7.1 Exposure classes for which External Credit Assessment Institutions ('ECAI') or Export Credit Agencies ('ECA') are used

The Group uses external ratings from Moody's. These ratings are used for all relevant exposure classes, which are the following:

- Claims or contingent claims on central government or central banks
- Claims or contingent claims on regional governments or local authorities
- Claims or contingent claims on multilateral development banks
- Claims or contingent claims on institutions
- Claims or contingent claims on corporates (*it should be noted that most corporates are unrated*)
- Claims in the form of covered bonds
- Short-term claims on institutions and corporates
- Securitization positions
- Claims in the form of collective investment undertakings ("CIU") – *no exposure as at the year-end*

7.2 Transfer of credit assessments onto items not included in the trading book

The exposures are classified into the above exposure classes, and are then ranked into respective credit quality steps, that determine the risk-weight to be used in accordance with the provisions of the Directive.

In the case of financial institutions, the credit quality step is determined, according to the rating of the country under whose supervision they operate. It should be noted that all exposures with financial institutions with original maturity of three months or less, are risk-weighted 20%, unless the counterparty is unrated and the risk-weight assigned to its country is higher.

7.3 Association of external rating of each nominated ECAI or ECA with credit quality steps

The Group complies with the standard association published by the CBC, regarding the association of the external rating of each nominated ECAI or ECA with the credit quality steps prescribed in Annex VI of the Directive.

For Financial Institutions *

Risk weight	Moody's rating of central government
20%	Aaa to Aa3
50%	A1 to A3
100%	Baa1 to Baa3
100%	Ba1 to Ba3
100%	B1 to B3
150%	equal or lower than Caa1

* The above association also applies for regional governments or local authorities and for multilateral development banks (unless they are specifically stated in the CBC rules to be 0% risk-weighted).

For Sovereigns

Risk weight	Moody's rating of central government
0%	Aaa to Aa3
20%	A1 to A3
50%	Baa1 to Baa3
100%	Ba1 to Ba3
100%	B1 to B3
150%	equal or lower than Caa1

For Corporates

Risk weight	Moody's rating of central government
20%	Aaa to Aa3
50%	A1 to A3
100%	Baa1 to Baa3
100%	Ba1 to Ba3
150%	B1 to B3
150%	equal or lower than Caa1

7.4 Exposure before and after credit risk mitigation

The exposure before and after credit risk mitigation associated with each credit quality step mostly for financial institutions and governments, as at the year-end was as follows:

Rating	TOTAL Exposure €Million
Aaa - Aa3	7.969
A1- A3	1.385
Baa1 - Baa3	262
NR	143
Items in course of collection	72
TOTAL	9.831

As at the year-end there was no credit risk mitigation available for exposures with banks and sovereigns and corporate bonds/derivatives. Therefore, the above amounts indicate the exposures both before and after credit risk mitigation.

8. Operational risk

8.1 Approaches for the assessment of own funds requirements

The Group follows the Standardised Approach for the calculation of own funds requirements for operational risk for which the approval of the CBC was obtained.

8.2 Relevant internal and external factors considered in the bank's measurement approach

As the Group is using the Standardised Approach it is exempt from utilising data on internal and external factors for capital calculation (required for banks that use the Advanced Measurement Approach). Nonetheless, as required for the Standardised Approach, internal loss data is collected in an in-house developed database. Where available, external data is considered as part of the Group's overall risk assessment. The internal data is submitted to the CBC together with the Capital calculation as required.

9. Exposures in equities not included in the trading book

The Group holds equity securities mainly for the purposes of capital appreciation. At 31 December 2008, the Group also had certain equity securities obtained from customers in satisfaction of debt as well as certain venture capital investments.

Listed equity securities are measured at fair value, being the market value of these securities on a recognised stock exchange. Unlisted securities are also measured at fair value, which are determined using valuation models. These models are periodically reviewed by qualified personnel.

There have been no significant changes to these practices in 2008 compared to 2007.

Of the total equity securities held by the Group as at 31 December 2008, €24.189 thousand were classified as available for sale and €3.057 thousand were classified as at fair value through profit or loss.

The balance sheet value of the Group's equity securities not included in the trading book at 31 December 2008 is €27.246 thousand, analysed as follows:

	€000
Listed on the Cyprus Stock Exchange	19.359
Listed on European stock exchanges	3.590
Unlisted venture capital investments	3.057
Other unlisted	1.240
Total	27.246

There is no difference between the fair value and the balance sheet value of equity securities.

The realised gain from disposals of equity securities during 2008 amounted to €1.007 thousand and were included in the income statement. The total cumulative unrealised gain on revaluation of available-for-sale equity securities amounted to €4.644 thousand and were included in the revaluation reserves of the Group.

10. Exposure to interest rate risk on positions not included in the trading book

The Group ALCO sets limits on the maximum allowable interest rate risk in the banking book, for each banking unit. The exposure is measured as follows:

Impact on Net Interest Income

The maximum loss limits apply for each year, for the first three years. They were set as a percentage of Group capital (1,5%) and as a percentage of net interest income of the Group (5%) and were allocated to the various banking units of the Group based on their contribution to net interest income. Small limits for open interest rate positions have been approved for periods more than three years.

The table below indicates how the net interest income of the Group, over a one-year period, will be affected from a reasonably possible change in the interest rates of the main currencies:

Change in rates	Euro	USD	GBP	Other currencies	Total
	€000	€000	€000	€000	€000
2008					
+0,5% in all currencies	12.004	2.115	495	(321)	12.270
-0.25% in USD and -0,5% in other currencies	(13.599)	(1.145)	(528)	210	(13.851)

The total change in net interest income differs from the sum of the changes for each individual currency, as it has been calculated based on the actual correlation coefficients between the interest rates of the various foreign currencies, and perfect positive correlation between the interest rate of the foreign currencies and the Euro.

Impact on the Economic Value of equity

The impact on the Economic Value of equity is measured for Group positions, for a 200 basis points change in interest rates. The Group ALCO has set a maximum limit of 10% of Group regulatory capital for this change. The change in the economic value of the Group as at the end of December 2008 amounted to €127 million (5,3% of Group regulatory capital, calculated in accordance with CBC rules).

Measuring the interest rate effect

The following methodology is used to measure the interest rate effect:

The assets and liabilities in each currency are placed in time bands, according to the number of days remaining from the reporting date until their next repricing date. The difference between assets and liabilities repricing in each time band, 'the gap' is then calculated. The gaps are the starting point in calculating both the impact on net interest income and on economic value from a certain change in interest rates.

A rate change is applied on the gap of each time band for the number of days from the middle of the time band to the year-end in order to calculate the impact on net interest income. Moreover, a factor (provided in the Basel document "Principles for the management and supervision of interest rate risk" for the standardised interest rate shock and corresponding to a 2% rate change) is applied to the gap of each time band in order to calculate the impact on Economic Value.

The interest rate effect, on interest income is measured according to the following scenarios:

- I. For a 1% increase and a 1% decrease in rates assuming a parallel shift of the yield curve.
- II. Using interest rate changes for each currency and time period as suggested by the yield curves.

The overall interest rate effect is calculated in two ways:

- a) As the average of the interest rate effects using the assumption of positive and zero correlations, since we know from historic data that actual correlations lie between 0 and 1.
- b) Using the actual correlations of 1-month interest rates.

Daily monitoring – for the purpose of monitoring compliance with the maximum loss limit on a daily basis, the interest rate effect is calculated using method I above and a) only – that is to say a 1% parallel shift in both directions will be used and the average of the zero and positive correlations will be applied.

Monthly monitoring – All the above methods will be used. In the case of operations in Australia, Channel Islands, Russia, Romania and Ukraine monitoring for the time being will be monthly– methods I and II above will be used. As the operations grow and become more complex, more frequent monitoring will be carried out.

All the interest rate effects calculated using the above methodologies should be within the overall limit for each banking unit.

Concentration limits per currency

In order to avoid excessive variations in Group net interest income caused by the change in the interest rate of a particular currency, it is prudent to limit the maximum interest rate effect by establishing concentration limits per currency. These limits are related to the size of the assets and liabilities of each currency. Concentration limits are set for the Bank's operations in Cyprus and Greece. No concentration limits are set for the other operations (in the UK, the Channel Islands, Australia, Russia, Romania and Ukraine) due to the size of their balance sheets.

11. Market Risk Trading Books

The Group has a low market risk appetite. There are very small limits for undertaking market risk in trading books.

FX Trading book

There was a trading book in FX, which operated in the Cyprus dealing room only until the 16th of May 2008. The following limits were available:

Stop-Loss limits

Daily	€86.000
Monthly	€170.000

Value at Risk limit **€260.000**

Furthermore, there are position limits for intra-day and overnight positions.

During 2008, the actual losses on any given day did not exceed the Value at Risk limit.

Capital Markets Trading book

In Cyprus there was also a capital markets trading book, that included credit and interest rate risk positions until the 30th June 2008.

The following limits applied:

Stop Loss limits

Daily	€170.000
Monthly	€340.000
Annually	€850.000

Position limits

Credit Risk positions	€275 million
Interest Rate Risk positions	€70 million

With effect from 1 July 2008, the trading book was closed and the positions were reclassified from the trading portfolio to the 'Available for Sale' category.

Equities Trading book

In addition to the above, some equities listed in the Cyprus Stock Exchange are held in a trading book in the books of the Cyprus operations of the Bank and its subsidiary CISCO. The intention is to gradually dispose of these equities and close the trading book.

APPENDIX 1

The list of Group companies as at 31 December 2008 by country of incorporation is set out below:

Company Name	Activities	Consolidation method	
		Accounting purposes	Prudential purposes
Cyprus			
Bank of Cyprus Public Company Ltd	Commercial banking	C	C
Mortgage Bank of Cyprus Ltd	Commercial banking	C	C
The Cyprus Investment and Securities Corporation Ltd (CISCO)	Investment banking	C	C
General Insurance of Cyprus Ltd	General insurance	C	D
EuroLife Ltd	Life insurance	C	D
Kermia Ltd	Property trading and development	C	D
Kermia Properties & Investments Ltd	Property trading and development	C	D
Kermia Hotels Ltd	Hotel business	C	D
BOC Ventures Ltd	Management of venture capital investments	C	C
Tefkros Investments Ltd	Investment fund	C	D
JCC Payment Systems Ltd	Credit card transactions processing	PC	PC
Cytrustees Investment public Company Ltd	Closed - end investment company	C	D
Interfund Investments Plc	Closed - end investment company	Associate (Equity Method)	D
Diners Club (Cyprus) Ltd	Diners club credit card facilities	C	C
BOC Russia (Holdings) Ltd	Intermediate holding company	C	C
Greece			
Bank of Cyprus Public Company Ltd (branch)	Commercial banking	C	C
Kyprou Leasing SA	Leasing	C	C
Kyprou Commercial SA	Financing of motor vehicles and other consumer products	C	C
Kyprou Securities SA	Investment banking	C	C
Kyprou Mutual Fund Management Company (Kyprou AEDA)	Management of mutual funds	C	C
Kyprou Properties SA	Property management	C	D
Kyprou Insurance Services Ltd	General insurance brokers	C	D
Kyprou Zois (branch of EuroLife Ltd)	Life insurance	C	D
Kyprou Asfalistikí (branch of General Insurance of Cyprus Ltd)	General insurance	C	D
United Kingdom			
Bank of Cyprus United Kingdom (branch)	Commercial banking	C	C
Channel Islands			
Bank of Cyprus (Channel Islands) Ltd	Commercial banking	C	C
Tefkros Investments (CI) Ltd	Investment Fund	C	D
Australia			
Bank of Cyprus Australia Ltd	Commercial banking	C	C
Romania			
Bank of Cyprus Romania (branch)	Commercial banking	C	C
Cyprus Leasing Romania IFN SA	Leasing	C	C
Russia			
LLC CB 'Bank of Cyprus'	Commercial banking	C	C
Cyprus Leasing LLC	Leasing	C	C
CB Uniastrum Bank LLC	Commercial banking	C	C
Uniastrum Leasing LLC	Leasing	C	C
Ukraine			
OJSB Bank of Cyprus	Commercial banking	C	C

C: Fully Consolidated

D: Deducted from Capital Base

PC: Proportionally Consolidated