Alpha Bank S.A

Pillar III Disclosures

Report for June 30, 2025

ALPHA BANK

Contents

1 Introduction 9

1.1 General Information 9

2 Pillar III Disclosures Overview 11

2.1 Background 11

2.1.1 Disclosures' enhancements 11

2.1.2 Approval and publication 12

2.2 Supervision and Regulatory Framework 13

2.3 Significant Developments 17

2.3.1 NPE Plan/NPE Initiatives 17

2.3.2 Transactions 19

2.3.3 EU-Wide 2025 Stress test 23

3 Capital Management 23

3.1 Capital Ratios 25

3.1.1 Key metrics 27

3.2 Reconciliation of regulatory own funds to the balance sheet according to IFRS 29

3.3 Capital requirements under Pillar I 32

3.4 Capital Buffers 35

4 Leverage 39

5 Credit Risk 45

5.1 Credit risk mitigation 59

5.1.1 Collateral valuation and management policies and procedures 59

5.1.2 Description of the main collateral types 60

6 Counterparty credit risk (CCR) 66

7 Exposure to Securitisation positions 74

7.1 Traditional Securitisations 74

7.2 Synthetic Securitisations 77

8 Market Risk 86

8.1 IMA approach for market risk 87
8.2 Standardized approach for market risk 93
9 Interest Rate and Credit Spread Risk in the Banking Book 94
9.1 Definition 94
9.2 Interest Rate Risk Framework 95
9.3 Interest Rate Risk Statement 95
9.4 Interest Rate Risk Monitoring 96
9.5 Interest Rate Risk management and mitigation strategies 97
9.6 Interest Rate Risk Key modelling and parametric assumptions 97
9.7 Significance of the IRRBB measures and significant variations since previous disclosures 98
10 Liquidity Risk 99
10.1 Liquidity risk management strategies and processes 99
10.2 Liquidity risk management structure and organization 99
10.3 Centralized group liquidity management and individual legal entity Liquidity management 99
10.4 Scope and nature of liquidity risk measurement and reporting system 100
10.5 Liquidity stress testing and scenario analysis 100
10.6 An outline of the bank's contingency funding plans 100
10.7 Legal, regulatory and operational limitations on the transferability of liquidity between individual legal entities, foreign branches and subsidiaries 101
10.8 Liquidity Coverage Ratio (LCR) 101
10.9 Net Stable Funding Ratio 102
11 Environmental, Social and Governance (ESG) Risks 105
11.1 ESG Strategy and Governance 105
11.1.1 Environmental Risk 105
11.1.2 Social Risk 121
11.1.3 Governance Risk 128
11.2 ESG Risk Management Framework 131
11.2.1 Environmental risk 131
11.2.2 Social risk 156
11.2.3 Governance risk 160

11.3 Quantitative Disclosures on Climate change transition, Physical Risks and Mitigating actions 163

11.3.1 Banking book–Climate Change transition risk:Credit quality of exposures by sector, emissions and residual maturity 163

11.3.2 Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 178

11.3.3 Banking book – Climate change transition risk: Alignment metrics.....184

11.3.4 Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 187

11.3.5 Banking book - Climate change physical risk: Exposures subject to physical risk.....188

11.3.6,7,8,9,10 Summary of GAR KPIs on Taxonomy aligned exposures and Other climate change mitigating actions that are not covered in the EU Taxonomy 194

Appendix I – Own Funds structure 195

Appendix II – Net Stable Funding Ratio 201

ID	Template	Description	Section	Page
Capital Management				
1		Capital Adequacy Ratios	3.1	26
2	KM1	Key Metrics template	3.1.1	27
3		Own Funds Structure	3.1.1	28
4	CC2	Reconciliation of regulatory own funds to balance sheet in the audited financial statements	3.2	29
5	OV1	Overview of RWAs	3.3	33
6	CCyB1	Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer	3.4	36
7	CCyB2	Amount of institution-specific countercyclical capital buffer	3.4	38
Leverage				
8	LR1	Summary reconciliation of accounting assets and leverage ratio exposures	4	39
9	LR2	Leverage ratio common disclosure	4	40
10	LR3	Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	4	43
Credit Risk				
11	CR1-A	Maturity of exposures	5	45
12	CQ5	Credit quality of loans and advances to non-financial corporations by industry	5	46
13	CQ4	Quality of non-performing exposures by geography	5	48
14	CQ1	Credit quality of forborne exposures	5	50
15	CQ3	Credit quality of performing and non-performing exposures by past due days	5	52
16	CR1	Performing and non-performing exposures and related provisions	5	54
17	CR2	Changes in the stock of non-performing loans and advances	5	56
18	CR5	Standardised approach	5	57
19	CR3	CRM techniques overview: Disclosure of the use of credit risk mitigation techniques	5.1.2	61
20	CR4	Standardised approach – credit risk exposure and CRM effects	5.1.2	63
21	CQ7	Collateral obtained by taking possession and execution processes	5.1.2	65
Counterparty Credit Risk (CCR)				
22	CCR1	Analysis of CCR by approach	6	67
23	CCR8	Exposures to CCPs	6	69
24	CCR3	Standardised approach – CCR exposures by regulatory portfolio and risk	6	71
25	CCR5	Composition of collateral for CCR exposures	6	73

Exposure to Seruritisation positions				
26	SEC1	Securitisation exposures in the non-trading book	7.2	79
27	SEC3	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor	7.2	81
28	SEC4	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor	7.2	83
29	SEC5	Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	7.2	85
Market Risk				
30	MR2-A	Market risk under the internal Model Approach (IMA)	8.1	87
31	MR2-B	RWA flow statements of market risk exposures under the IMA	8.1	88
32	MR3	IMA values for trading portfolios	8.1	90
33	MR4	Comparison of VaR estimates with gains/losses	8.1	92
34	MR1	Market risk under the standardised approach	8.2	93
Interest Rate Risk in the Banking Book				
35	IRRBB1	Interest rate risks of non-trading book activities	9.7	98
Liquidity Risk				
36	LIQ1	Quantitative information of LCR	10.8	101
37	LIQ2	Net Stable Funding Ratio	10.9	102
Environmental,Social and Governance (ESG) Risks				
38		Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	11.3.1	166
39		Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral	11.3.2	180
40		Banking book – Climate change transition risk: Alignment metrics	11.3.3	185
41		Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms	11.3.4	187
42		Banking book - Climate change physical risk: Exposures subject to physical risk	11.3.5	190

Appendix

43	CC1	Composition of Regulatory own funds	I	195
44	LIQ2	Net Stable Funding Ratio	II	201

Abbreviation	Definition
ALCo	Assets-Liabilities Management Committee
BoD	Board of Directors
BoG	Bank of Greece
Bps	Basis Point
BRRD	Bank Recovery and Resolution Directive
CAR	Capital Adequacy Ratios
CBR	Combined Buffers Requirements
CCF	Credit Conversion Factor
CCP	Code of Civil Procedure
CCR	Counterparty Credit Risk
CCyB	Countercyclical Capital Buffer
CDS	Credit Default Swaps
CET1	Common Equity Tier 1
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CRD	Capital Requirements Directive
CRE	Commercial Real Estate
CRM	Credit Risk Mitigation
CRO	Chief Risk Officer
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Valuation Adjustment
DTA	Deferred Tax Assets
EAD	Exposure at Default
EBA	European Banking Authority
ECAI	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
ELA	Emergency Liquidity Assistance
EU	European Union
FRTB	Fundamental Review of the Trading Book
FTP	Fund Transfer Pricing mechanism
FVTOCI	Fair Value Through Other Comprehensive Income
FVTPL	Fair Value Through Profit or Loss
FX	Foreign Exchange
GDP	Gross Domestic product
GL	Guidelines
GMRA	Global Master Repurchase Agreement
KPI	Key Performance Indicator
KRI	Key Risk Indicator
LAS	Liquidity Adequacy Statements
LCR	Liquidity Coverage Ratio
LGD	Loss given default
LTV	Loan to Value
HDIGF	Hellenic Deposit and Investment Guarantee Fund
IAS	International Accounting Standards
ICAAP	Internal Capital Adequacy Assessment Process
ICS	Internal Control System

Abbreviation	Definition
ILAAP	Internal Liquidity Adequacy Assessment Process
IFRS	International Financial Reporting Standards
IMA	Internal Model Approach
IRB	Internal Ratings Based (approach)
IRRBB	Interest Rate Risk in the Banking Book
ISDA	International Swap and Derivatives Association
IT	Information Technology
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
NCA	National Competent Authorities
NPE	Non-Performing Exposure
NPL	Non-Performing Loan
NRA	National Resolution Authorities
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
O-SII	Other Systemically Important Institution
OTC	Over the Counter
P2R	Pillar 2 Requirement
PD	Probability of default
POCI	Purchased or Originated Credit Impaired
RAF	Risk Appetite Framework
RAS	Risk Appetite Statement
RAY	Risk Authority
RCSA	Risk Control Self – Assessment
RRE	Residential Real Estate
RemCo	Remuneration Committee
RWA	Risk Weighted Assets
SA	Standardized Approach
SFTs	Securities Financing Transactions
SME	Small & Medium Enterprises
SPPI	Solely Payments of Principle and Interest
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRM	Single Resolution Mechanism
SRPC	Supervisory and Resolution Projects Committee
SSM	Single Supervisory Mechanism
STA	Standardized Approach
SVaR	Stressed Value at Risk
TAC	Troubled Assets Committee
TC	Total Capital
TSCR	Total SREP Capital Requirements
UTP	Unlikely to Pay
VaR	Value at Risk

1 Introduction

1.1 General Information

Alpha Bank is one of the leading banks of the Greek privately owned banking sector and constitutes a consistent point of reference for over 140 years. The Bank offers a wide range of high-quality financial products and services, including retail banking, SMEs and corporate banking, asset management and private banking, distribution of insurance products, investment banking, brokerage and real estate management.

Alpha Bank, which was founded in 1879 by John F. Kostopoulos, has its headquarters at 40 Stadiou Street, Athens, and is registered in the Register of Companies with number 6066/06/B/86/05. The Bank is subject to the Greek banking law and is supervised by the European Central Bank (ECB) and the Single Supervisory Mechanism (SSM).

On 2.4.2021 the Extraordinary General Meeting of the Shareholders approved the demerger of the société anonyme under the corporate name “Alpha Bank S.A.” by way of hive down of its banking business sector with the incorporation of a new entity.

On 16 April 2021, the demerger of the former Alpha Bank S.A., then authorized to operate as a credit institution (under G.E.MI. number 223701000 and Tax Identification Number 094014249), which has been already renamed to “Alpha Services and Holdings S.A.”, (“Group”) was announced pursuant to the Decision of the Ministry of Development and Investments under protocol no 45089/16.4.2021 by way of hive-down of the banking business sector with the incorporation of a new company, which was licensed to operate as a credit institution under the name “Alpha Bank S.A.” (under G.E.MI. number 159029160000 and Tax Identification Number 996807331) (the “Bank”), in accordance to the provisions of Article 16 of Greek law 2515/1997, as well as Articles 54 paragraph 3, 57 paragraph 3, 59-74 and 140 paragraph 3 of Greek law 4601/2019 and Article 145 of Greek law 4261/2014, as in force (the “Hive Down”). As a consequence of the Hive Down, the Bank substituted Alpha Holdings by operation of Greek law, as universal successor, in all of its assets and liabilities, rights and obligations and in general its legal relationships within the banking business sector.

Following the demerger, “Alpha Services and Holdings S.A.”, is supervised on a consolidated basis and “Alpha Bank S.A” is supervised on a standalone basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

The Group is active in the Greek and international banking market, with presence in Cyprus, the United Kingdom and Luxemburg.

On 13.12.2024 Alpha Services and Holdings S.A announced the initiation of the merger process, by way of which Alpha Bank S.A. shall proceed with a merger by absorption of Alpha Services and Holdings S.A. Upon the completion of the merger, Alpha Bank will retain its license as a credit institution and will succeed by force of law and by way of a universal succession the Company in any and all of its assets and liabilities. Prior to the Merger completion, the shares of Alpha Bank S.A will be listed on the Athens Exchange and its shares will be delivered upon Merger completion to the Shareholders of Alpha Services and Holdings S.A in exchange for their shares in the Company. The December 31, 2023 has been set as the Transformation Balance Sheet date of the Merger.

On 27.2.2025 the Board of Directors of Alpha Bank S.A and the Board of Directors of Alpha Services and Holdings approved and agreed with the publication of the Merger Documents (the Draft Merger Agreement, the BoD Reports, the Transformation Balance Sheet and (without approval) the Independent Auditor's Reports) and amended the Transformation Balance Sheet date to 31.12.2024 compared to 31.12.2023 previously.

On 23.6.2025 the Extraordinary General Meeting of Alpha Services and Holdings S.A (hereinafter the "Absorbed Company" or the "Company"), took place and resolved on the approval of the below:

a. the merger by absorption between the Bank, acting as the absorbing entity, and the Company, as the entity being absorbed pursuant to article 16 of Law 2515/1997 as well as articles 7-21 and 140 of Greek law 4601/2019, as in force;

b. the Merger Documentation related to the Company, i.e., the Draft Merger Agreement, the Merger Transformation Balance Sheet dated 31.12.2024, the Report of the Absorbing Company's Board of Directors on the Draft Merger Agreement and the Report on the verification of the book value of its assets and liabilities.

Following the above, it is noted that the completion of the Merger obtained the approval of the competent supervisory authority, i.e. the European Central Bank (acting through the Single Supervisory Mechanism) in accordance with article 16 of L. 2515/1997 and the Merger became effective on 27 June 2025 upon the registration of the final merger agreement with the Greek Commercial Registry (GEMI) and the publication of the announcement of the approval by the Ministry of Development. As a result of the Merger, Alpha Bank S.A is the surviving entity and has succeeded by force of law and by way of universal succession in any and all of the assets and liabilities of Alpha Holdings S.A while Alpha Holdings S.A has been dissolved without liquidation and has ceased to exist.

2 Pillar III Disclosures Overview

2.1 Background

The Group Pillar III Report is prepared in accordance with disclosure requirements as laid down in Part Eight of the "Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms" (Capital Requirements Regulation, or "CRR") and the "Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms" (Capital Requirements Directive IV, or "CRD IV").

The purpose of Pillar 3 report is:

- to disclose regulatory information relating to the risk management framework,
- to enhance transparency as well as investors information and market discipline

2.1.1 Disclosures' enhancements

On 12 February 2025, EBA published its final draft ITS on the Pillar 3 data hub for large and other institutions, which will centralize prudential disclosures by institutions through a single electronic access point on the EBA website. This project is part of the Banking Package laid down in the CRR3 and CRD6.

The ITS detail the IT solutions and processes to be followed by large and other institutions when submitting their respective Pillar 3 disclosures. This includes the IT solutions to be used, the data exchange formats to be considered and the technical validations to be performed by the EBA. The EBA provides additional detailed information to the submitters of Pillar 3 information in the onboarding communication plan.

The Pillar 3 data hub kicked-in on 30 June 2025.To submit the information to the EBA, institutions will benefit from a transition period for the information with disclosure reference dates from June to December 2025. This will give them enough time to prepare for the new publication process.

On 22 May 2025, EBA published an onboarding plan for large and other institutions, setting out the steps required for accessing and submitting information to the new Pillar 3 Data Hub (P3DH) – the EBA's centralized platform for public disclosures under the Capital Requirements Regulation (CRR3).

The onboarding plan outlines the procedural steps that institutions need to follow to ensure timely and accurate submissions of Pillar 3 information. The onboarding plan provides a step-by-step guide for the identification of institutions and to give them access to the EBA's EUCLID Regulatory Reporting Platform, through which the Pillar 3 data will be submitted. It also spells out the timeline for the process, which will follow a phased-in approach.

This means that institutions will be able to continue to fulfil their Pillar 3 disclosure obligations during 2025 as usual, and the submissions to the P3DH will occur only at a later stage. This approach will give institutions with enough time to complete the onboarding process and align their internal processes, without impacting the compliance with the CRR requirements.

The P3DH information will be available to the public from December 2025.

Along with the onboarding plan, EBA launched a public consultation on proposed amendments to the European Commission's Implementing Regulation on Pillar 3 disclosures under the CRR3. The proposal specifies enhanced and proportionate disclosure requirements related to ESG-related risks, equity exposures and aggregate exposure to shadow banking entities. It also implements the new codes for the statistical classification of economic activities in the EU (NACE). The consultation ran until 22 August 2025.

On 6 August 2025, EBA published a no-action letter on the application of the ESG Pillar 3 disclosure requirements under the EBA disclosure Implementing Technical Standards (ITS). This no-action letter aims to address legal and operational uncertainties linked to the evolving ESG disclosure framework, in light of the proposed amendments under the European Commission's Omnibus legislative package on sustainability reporting.

This no-action letter formalizes the guidance already provided in the EBA's Consultation Paper published in May 2025 on the amending ITS of the EBA Pillar 3 disclosure framework. In particular, it includes the following recommendations to competent authorities until the EBA amending ITS included in the Consultation Paper enter into force:

- To not prioritize the enforcement of the disclosure of certain ESG disclosure templates (notably EU 6 to EU 10, and specific columns in Templates 1 and 4 of the Commission's Implementing Regulation (EU) 2024/3172, for large institutions with listed securities;
- To not prioritize the enforcement of the collection of templates EU 6 to 10, and specific columns in Templates 1 and 4 of the EBA Decision EBA/DC/498 of 6 July 2023, for large institutions with listed securities;
- To not prioritize the enforcement of the disclosure of the corresponding ESG templates under the Commission's Implementing Regulation (EU) 2024/3172 for all other institutions recently brought under the scope of Article 449a of the Capital Requirements Regulation (CRR).

The EBA remains committed to delivering a coherent and streamlined ESG disclosure framework and will continue to work closely with EU institutions and stakeholders to ensure smooth implementation of the new requirements.

The EBA also published an updated version of the EBA ESG risk dashboard. The ESG risk landscape across EU/EEA banks appears stable, thus reflecting the long-term horizon of climate-related risks and the gradual pace of change in banking portfolios.

It should be noted that the content of the ESG risk dashboard will be adjusted in the next editions in line with the no-action letter, and the recommendations to authorities not to prioritize the enforcement of the disclosure of those specific templates and information.

2.1.2 Approval and publication

In accordance with the Group's internal governance framework, a "Pillar III Disclosures Policy" has been developed and implemented aiming to ensure consistent and continuous compliance with the disclosure requirements of the regulatory framework and best practices.

The adopted policy sets the minimum content of public disclosures presented.

The Bank with the aim to apply, at all times, best practices and cover any new regulatory requirements, reviews its disclosure policy when deemed necessary and at least on an annual basis and updates the extent and type of information provided at each disclosure date accordingly.

The Bank publishes the Pillar III report via its website, within the applicable deadlines. The data included in this report may be different than the respective accounting data, mainly due to differences between the regulatory consolidation and the accounting consolidation and/or differences in the definitions used. However, the Group's financial statements, used together with Pillar III disclosures, complement market participants' information and enhance transparency.

The Pillar III disclosures have been prepared in accordance with the Bank's formal policy and internal processes, systems & controls and business units ensure the accuracy of their data submissions. The Supervisory and Resolution Projects Committee (SRPC) attests that the report has been prepared in accordance to the requirements under Article 431 (3) CRR and the respective internal control processes. The more detailed disclosures (annual and semi-annual) are endorsed by the Risk Management Committee (RMC) and approved by the Board of Directors (BoD).

2.2 Supervision and Regulatory Framework

Single Supervisory Mechanism (SSM)

Since November 2014, Alpha Bank has been assessed as "Other Systemically Important Institution" (O-SII) and, as such, is directly supervised by the ECB in accordance with the SSM framework.

The Single Supervisory Mechanism (SSM) refers to the system of banking supervision in Europe and it comprises the ECB and the national supervisory authorities of the participating countries.

The applicable banking regulatory framework in the European Union (EU), the Basel 3 capital framework, is effective from January 1, 2014.It was implemented by the "Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms" (Capital Requirements Regulation, or CRR) published on June 27, 2013, in combination with the "Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms" (Capital Requirements Directive IV, or CRD IV) published on June 27, 2013 that has been transposed into the Greek legislative framework by the Law 4261/2014. The framework has been amended by the Regulation (EU) 2019/876 (CRR II) of 20 May 2019 and the Directive (EU) 2019/878 (CRD V) of 20 May 2019. The latter has been transposed into the Greek legislative framework by the Law 4799/2021.

The adoption of the Capital Requirements Regulation (CRR III), applicable from 01.01.2025, introduces a series of significant changes to the regulatory framework established under CRR II, particularly in the context of standardized approaches to credit risk, market risk, operational risk and CVA risk. These modifications aim to enhance the resilience of financial institutions while ensuring greater consistency and comparability across jurisdictions.

The transition from CRR II to CRR III reflects the European Union's commitment to implementing the final Basel III reforms (Basel IV). CRR III aims to:

- Enhance the risk sensitivity of prudential frameworks
- Improve the comparability and transparency of financial institutions' risk profiles
- Promote a more resilient banking system capable of withstanding economic shocks

For the calculation of capital adequacy ratio the provisions of the aforementioned regulatory framework are followed. In addition:

- Besides the 8% capital adequacy limit, limits of 4.5% for CET 1 ratio and 6% for Tier 1 ratio are applied.
- Capital buffers over and above the CET1 capital limits are required to be maintained. In particular the Combined Buffer Requirement (CBR) consisting of:
  - Capital conservation buffer (CCB) stands at 2.5%.
  - Capital buffers as provided by the Bank of Greece through its Executive Committee Acts as follows:

    - countercyclical capital buffer (CCyB), equal to “zero percent” (0%) for the second quarter of 2025

    - other systemically important institutions (O-SII) buffer, which stands at 1.00% for 2025

It is noted that, under Executive Committee Act 235/1/07.10.2024 the Bank of Greece has decided to set the countercyclical capital buffer rate for Greece at 0.25%, applicable from 1 October 2025. The target rate for the positive neutral rate of the countercyclical capital buffer in Greece stands at 0.5%.

These limits should be met on a consolidated basis.

Supervisory Review and Evaluation Process (SREP)

According to Council Regulation 1024/2013, ECB conducts annually a Supervisory Review and Evaluation Process (SREP) to assess the risk profiles of the institutions under its remit.

This process evaluates the:

- Sustainability and viability of business model
- Adequacy of governance and risk management
- Assessment of risks to capital and
- Assessment of risks to liquidity and funding

Following the assessment, the ECB determines the minimum capital requirements and sets qualitative requirements to each of the banking institutions.

Taking into consideration the 2024 SREP decision, ECB notified Alpha Services and Holdings S.A., and as a result its universal successor after reverse merger Alpha Bank S.A., that for H1 2025 it was required to meet the minimum limit for consolidated Overall Capital Requirements (OCR), of at least 14.71%. OCR includes for Q2 2025 the CCB Capital Buffer of 2.5%, the O-SII buffer of 1% and the CCyB of 0.21%, which mainly derives from the contribution of subsidiaries.

The OCR consists of the minimum limit of the total Capital adequacy Ratio (8%), in accordance with art. 92(1) of the CRR, the additional regulatory requirements of Pillar2 (P2R) in accordance with article 16(2) (a) of the Council Regulation EU 1024/2013 (3%), as well as the combined buffers’ requirements (e.g.CCB, OSII, CCyB), in accordance with Article 128 (6) of Directive2013/36/ EU. The minimum rate should be kept on an on-going basis, considering the CRR/ CRD Transitional Provisions

Single Resolution Mechanism (SRM)

The Single Resolution Mechanism (SRM) that implements the EU-wide Bank Recovery and Resolution Directive (BRRD – see next paragraph) in the euro area. The Single Resolution Board (SRB) in cooperation with the National Resolution Authorities (NRAs), are responsible for the design of the specific resolution strategy for each institution which, among others, includes the resolution actions that could be executed following adequate preparation.

Recovery and Resolution

The European Bank Recovery and Resolution Directive (2014/59/EU – "BRRD"), which is part of the Single Rulebook, establishes a framework for the recovery and resolution of credit institutions and investment firms. The Directive introduced a set of common rules to deal with banking crises across the EU and the orderly recovery and resolution of financial institutions, with the aim to avoid significant adverse effects on financial stability and to ensure that shareholders and creditors (including unsecured depositors) will share the burden in case of a potential recapitalization and/or liquidation. The Directive was transposed into the Greek legislation with Law 4335/2015.

Among other topics, the Directive requires Member States to ensure that institutions prepare and regularly update a Recovery Plan setting out the measures that may be taken to restore their financial position following a significant deterioration thereof. The recovery plan addresses, amongst other aspects, various types of recovery measures that a credit institution may adopt in order to maintain or restore its financial position following a significant deterioration, a framework of recovery indicators that determines the areas in which such measures could be implemented, as well as a set of hypothetical scenarios of instability affecting either the institution alone or the entire financial system and which are used to assess the feasibility of the recovery measures being considered. The Group develops its Recovery Plan on an annual basis, taking into consideration applicable EU Regulations and Directives, national laws, relevant Regulatory Technical Standards (RTS) and Guidelines published by the European Banking Authority (EBA) as well as reports published by the European Central Bank (ECB) on lessons learnt and best practices.

The BRRD also established the framework to create a Single Resolution Mechanism (SRM), the second pillar of the European Banking Union, which was subsequently developed through Regulation EU 806/2014 (SRMR). Under the SRM, the Single Resolution Board (SRB) in cooperation with the National Resolution Authorities (NRAs) are responsible for the design of the specific resolution strategy for each credit institution which, among others, includes the resolution actions that could be executed following adequate preparation. These authorities also draw up the Resolution Plan for credit institutions, which cooperate by providing the necessary information.

Following a legislative reform in November 2016 ("banking reform package"), the regulatory framework applicable to recovery and resolution topics has been amended, introducing the following updates:

- Regulation (EU) 2019/876 of the European Parliament and of the Council amending the Capital Requirements Regulation as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements (CRR 2). The CRR II has entered into force in 27 June 2019.

- Regulation (EU) 2019/877 of the European Parliament and of the Council amending Regulation (EU) No 806/2014 as regards loss-absorbing and recapitalization capacity for credit institutions and investment firms (known as “SRMR2”), applicable from 28 December 2020.

- Directive (EU) 2019/879 of the European Parliament and of the Council amending Directive 2014/59/EU on loss-absorbing and recapitalisation capacity of credit institutions and investment firms (known as “BRRD2”). The Directive is expected to be transposed into Greek law within 2021.
- On January 13, 2022 the EBA published its final Guidelines for institutions and resolution authorities on improving banks’ resolvability. These Guidelines represent a significant step in complementing the EU legal framework in the field of resolution based on international standards and leveraging on EU best practices.
- On July 19, 2023 the EBA published a Guidelines for institutions and resolution authorities on setting the framework for the determination and assessment of the Overall Recovery Capacity (ORC).

Minimum Requirement for Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (Bank Recovery and Resolution Directive or (“BRRD”), as amended by Directive 2019/879 (BRRD II), banks in the European Union are required to maintain a Minimum Requirement for own funds and Eligible Liabilities (“MREL”), which ensures sufficient loss-absorbing capacity in resolution. MREL includes a risk and a leverage-based dimension. MREL is therefore expressed as two ratios that both have to be met: (i) as a percentage of Total Risk Exposure Amount (“TREA”), (the “MREL-TREA”); and (ii) as a percentage of the Leverage Ratio Exposure (“LRE”), (the “MREL-LRE”).

On 22 April 2024, Alpha Bank S.A. received a communication letter from the European Single Resolution Board (SRB) including its decision for the minimum requirements for own funds and eligible liabilities (MREL). The requirements are based on the Recovery and Resolution Directive (“BRRD2”), which was incorporated into the Greek Law 4799/2021 on 18.5.2021. At the same time, by the same decision, the Resolution Authority defined the single point of entry (SPE) resolution strategy.

Following the Decision of SRB on 20 December 2024, Alpha Bank received the binding Minimum Requirement of Own Funds and Eligible Liabilities (MREL), according to which the Bank needs to meet from 30 June 2025 on a consolidated basis an MREL requirement of 23.57% of Total Risk Exposure Amount (TREA) and 5.91% of Leverage Exposure (LRE). The Decision also sets out that the binding target of AB SA also reflect the MCC[1] allowance.

The said MREL requirements expressed as a percentage of TREA do not include the Combined Buffer Requirement (CBR), equal to 3.71% as of 30.06.2025.

[1] Market Confidence Charge

Furthermore, the Resolution Authority has decided that Alpha Bank S.A. is not subject to requirement for subordinated MREL. Minimum requirements for own funds and eligible liabilities (MREL), are subject to annual review/approval from SRB.

On 30 June 2025, the Bank's MREL ratio on a consolidated basis stood at 28.6%, which is above the binding target of 27.28% of the Total Risk Exposure Amount (TREA) (effective 30.06.2025, including CBR). The ratio includes the profit of the financial reporting period that ended on 30 June 2025 post a provision for dividend payout.

Other Regulatory Restrictions

Group's significant restrictions regarding the use of assets or the settlement of obligations, are those imposed by the regulatory framework in which foreign subsidiaries, supervised for their capital adequacy and liquidity, mainly operate In particular, the regulatory authorities request, where appropriate and depending on the nature of the company, the compliance with specific thresholds, as for example the maintenance of a specific level of capital buffers and/or liquid assets, the limitation of the exposure to other Group companies and the compliance with specific ratios.

2.3 Significant Developments

2.3.1 NPE Plan/NPE Initiatives

NPE Plan (Update)

Significant NPE reduction of c. €0.7bn was recorded in 2024, out of which €0.6bn reduction stemmed from the result of NPE from transactions and €0.1bn was due to negative organic formation. As of Q4 2024,the Group's total NPE portfolio amounted to c. €1.5bn with a corresponding NPE ratio of 3.7%.

In March 2025 the Bank submitted an updated NPE Business Plan covering the period 2025-2027. Based on that, the NPE ratio for 2025 is estimated at c. 3.7% with further reduction to be achieved in the following years.

In H1 2025, the bank reported a further NPE reduction driven by both organic & in-organic actions, reaching an NPE stock of €1.5bn with a corresponding NPE ratio below 4%.

One of the key pillars of the Bank's Strategy is the de-risking of its balance sheet, and optimization of capital allocation towards core business activities while also improving its asset quality and normalizing the cost of risk. This targeted NPE reduction will be achieved through Alpha Bank's ongoing organic NPE reduction (i.e. cures, debt forgiveness, collateral based recoveries and other closing procedures) further supplemented by in-organic initiatives scheduled in the planning period. After the successful completion of NPE reduction initiatives, the Bank will be able to achieve significantly improved asset quality levels and reduced cost of risk, at par with other European banks, while maintaining a satisfactory capital position above minimum regulatory capital requirements.

Continuous monitoring of the evolution of NPE stock is performed for any negative developments/deviations in order to be counterbalanced by mitigating actions.

NPE initiatives

One of the key pillars of the Bank's Strategy is the de-risking of its balance sheet, putting capital to work with a view to improve its asset quality and normalize the cost of risk.

Despite the difficulties faced due to the persistence of the COVID-19 pandemic, Alpha Bank achieved the completion of securitization transactions of Euro c. 14.2 billion GBV, of both retail and wholesale NPEs, namely project Galaxy, the largest NPE securitization in Greece and second largest in Europe, and project Cosmos, making use of the Hellenic Asset Protection Scheme for the retained senior tranche, which as of 30.06.2025 amounted to Euro 4.8 billion.

Along with the securitization transaction, Alpha Bank also concluded the sale of its servicing platform, supporting Project Galaxy and enhancing business model efficiency. The servicer, new CEPAL, has undertaken the management of the remaining NPEs of Alpha Bank through an exclusivity agreement.

Following the delivery of the Galaxy and Cosmos securitizations, Alpha Bank, proceeded with the implementation of its accelerated NPE deleveraging plan through the following transactions which were successfully completed within the following years as per below:

Completed NPE Transactions - 2022:

- Project Orbit – sale of a domestic retail unsecured portfolio of Euro 1.2 billion GBV
- Project Light - sale of a domestic retail unsecured portfolio of Euro 0.2 billion GBV
- Project Shipping – sale of 2 single ticket NPE shipping exposures of Euro 0.1 billion GBV

Completed NPE Transactions - 2023:

- Project Sky – sale of a Cypriot NPEs portfolio and related Real Estate properties of Euro 2.3 billion GBV, through the sale of Sky CAC Ltd, a subsidiary of Alpha International Holdings S.A.
- Project Hermes – sale of a mixed pool of secured Non-Performing Loans to Greek Large Corporate Entities and Small-Medium Sized Enterprises of Euro 0.65 billion GBV
- Project Cell - the sale of a Portfolio of Retail Unsecured Non-Performing Loans, of Euro 1.5 billion total outstanding balance

Completed NPE Transactions - 2025:

- Project Gaia – Hellenic Asset Protection Scheme Securitisation for the retained senior tranche of two portfolios a) Gaia I, a perimeter of mainly secured mortgage Non-Performing Loans, of Euro 0.5 billion GBV and b) Gaia II, a perimeter of mainly secured Small Businesses, Mortgage and SME NPE exposures, of Euro 0.6 billion GBV

Moreover, NPE Deleveraging Plan entails the completion of the following transactions which have been classified to Held for Sale:

- Project Solar: Sale of a primarily secured non-performing portfolio of SB/SME loans with a total exposure of €0.6bn
- Project Andros: Disposal of NPE Leasing portfolio of Euro 0.24 billion GBV, which forms an integral part of Alpha Leasing's transformation
- Single ticket exposures Non-Performing Loans of Large Corporate Entities, of aggregate Euro 0.1 billion GBV
- Non-Performing Cypriot exposures of aggregate Euro 0.1 billion GBV
- Project Athena: Sale of a mainly secured portfolio of Small Businesses and Mortgage NPE exposures of Euro 0.2 GBV.

2.3.2 Transactions

During 2025, in line with the Strategic Plan, the Group proceeded with the following actions:

- ✓ On 27.1.2025, the Group entered into a binding agreement for the acquisition of 100% of the shares of Flexfin LTD, based in Cyprus, which is the sole shareholder of FlexFin S.A., based in Greece, with the aim of merging its Greek factoring activities with ABC Factors. Flexfin is the first fintech company active in the provision of factoring services in Greece and Cyprus, specializing in liquidity solutions tailored to small and medium sized businesses. Through its innovative platform, it offers convenience, speed, flexibility and transparency. Facilitating SME access to sufficient financing is a key strategic priority for Alpha Bank, thus the acquisition and subsequent merger of Flexfin with ABC Factors represents a decisive step towards this goal. With a priority focus on enabling financing through factoring of SMEs – a crucial pillar of the Greek economy - the merged company will significantly contribute to SME operational efficiency and growth and consequently to jobs creation. The integration of Flexfin is expected to significantly expand ABC Factors' customer base in the Greek market, with financing targets likely to exceed Euro 1 billion in the coming years. The completion of the transaction is expected to take place within the third quarter of 2025.
- ✓ On 31.3.2025 the Group announced the agreement on the key commercial and legal terms for the acquisition of AXIA Ventures Group Ltd. An agreement has been reached with the founding and main shareholders of AXIA Ventures Group Ltd ("AXIA") on the key financial and legal terms for the acquisition of the entire (and in any case not less than 95%) issued share capital of AXIA (the "Transaction"). The Transaction will include the combination of AXIA with Alpha Finance Investment Services S.M.S.A. ("Alpha Finance"), the investment services subsidiary of Alpha Holdings, as well as the Bank's Investment Banking unit, reinforcing the Group's strategic objective of enhancing fee and commission income generation and diversification of income sources while also significantly strengthening the product offering for corporate clients. The combination of AXIA with Alpha Finance teams is expected to create a prominent investment banking platform in Greece and Cyprus offering best-in-class, tailor-made and investment banking services.

- ✓ On 15.05.2025, it was announced that Scope Ratings has been mandated as a new credit rating agency for the Bank, assigning an Investment Grade rating of BBB /Stable. The new Investment Grade rating by Scope Ratings reflects Alpha Bank's leading franchise and market positioning in Greece, a strengthened balance sheet, sustainable earnings power and capital generation capacity, as well as the significantly improved asset-quality metrics and sound funding and liquidity position. The rating adds another Investment Grade rating to Alpha Bank's credit profile, complementing the upgrade by Moody's to Baa2 in March 2025. The decision to appoint Scope Ratings aligns with Alpha Bank's broader strategic objective to enhance its interconnectedness within Europe, its unwavering support for EU institutions (Scope is today the only European rating agency holding Eurosystem Credit Assessment Framework status since 2023 and has been ESMA registered since 2011) and its commitment to enhancing the development of European capital markets.
- ✓ On 22.05.2025, Alpha Bank and Visa announced a multi-year exclusive strategic partnership. The two leading organizations in the financial sector and payment technology announced the expansion of their long-term partnership, initiating a new era in the payments sector in Greece. With the aim of upgrading the Bank's products and services to individuals and businesses, Alpha Bank is expanding its strategic agreement with Visa, which is expected to accelerate the digital transition and enhance the growth of digital payments in Greece. Through this new partnership, Alpha Bank will offer a range of new products and services, with the aim of helping its customers better manage their finances and lifestyle needs. The partnership is expected to modernize payment services, as the two companies, through their joint action, will make available innovative solutions that enhance the security and ease of transactions. At the same time, leveraging Visa's technology, global scale and strong risk management capabilities, Alpha Bank will offer advanced digital banking capabilities that will meet the ever-evolving needs of the market.
- ✓ On 27.05.2025 it was announced that Alpha Bank and Hellenic Post (ELTA) signed a Memorandum of Understanding for Strategic Cooperation for the provision of financial services throughout Greece. This Strategic Partnership will support the provision of integrated financial services through the extensive network of 1,100 Elta service points across Greece. The cooperation aims to promote financial inclusion by improving physical access to diversified banking services, both in urban and rural areas.At the same time, the cooperation significantly expands the physical presence of Alpha Bank, allowing the provision of banking services through more than 1,400 service points nationwide. The completion of the cooperation is subject to the finalization of the relevant documents and the fulfilment of the usual prerequisites, including the receipt of all necessary regulatory approvals and consents.

- ✓ On 6.6.2025, in accordance with the Strategic Plan of the Group for the decrease of the non-performing exposures, the Group completed the sale of two Non-Performing Loan Portfolios (GAIA I and GAIA II transactions) through a securitization structure in accordance with the Greek securitization framework (L.3156/2003) and the Hellenic Assets Protection Scheme (L.4649/2019), as amended and in force. The transactions were performed by transferring the respective loan portfolios to the special purpose vehicles Gaia Securitization DAC and Gaia II Securitization DAC, which were established for this purpose and by issuing notes initially covered by the Group. The Group retained 100% of the senior notes and 5% of the mezzanine and junior notes of the special purpose entities and transferred the rest 95% of the mezzanine and junior notes to third party investors. The aforementioned transactions include:

  - ➢ a perimeter of loans with a carrying value before impairments as of 31.12.2024 of Euro 464 million, mainly comprising of non– performing mortgage exposures (“GAIA I”).

  - ➢ a perimeter of loans with a carrying value before impairments as of 31.12.2024 of Euro 565 million mainly comprised of Small Businesses and SME/Large corporate NPE exposures (“GAIA II”).

- ✓ As announced on 16.06.2025, Alpha Bank S.A. has purchased 12,705,745 ordinary shares with voting rights of Prodea, a real estate investment company listed in the Athens Stock Exchange increasing its equity stake from 4.90% to 9.87% of the total share capital of Prodea by possessing 25,224,977 ordinary shares with voting rights. Alpha Bank has performed this transaction as part of its strategy to further diversify its income sources, targeting to grow recurring income from yielding real estate assets with predictable cash flows.

- ✓ On 24.6.2025 it was announced that the subsidiary Alpha Bank Cyprus Ltd ("Alpha Bank Cyprus”) entered into the definitive Business Transfer Agreement with AstroBank Public Company Limited for the acquisition of substantially the whole of AstroBank’s assets, liabilities and personnel (the “Transaction”). This milestone followed the agreement on the Transaction’s key commercial and legal terms announced on February 27, 2025. The Transaction is fully aligned with the Group’s strategic objective of strengthening its market presence and financial position in Cyprus. Following the completion of the Transaction, Alpha Bank Cyprus is expected to consolidate its position as the third largest bank in Cyprus, delivering a material increase in its recurring profitability. The completion remains subject to the satisfaction of customary conditions precedent, including the obtaining of all necessary regulatory approvals and consents, and is anticipated within the fourth quarter of 2025.

- ✓ On 27.6.2025 the merger by absorption of “Alpha Services and Holdings S.A.” (hereinafter the “Company”) by Alpha Bank pursuant to the applicable legislation, has been completed (the “Merger”). As a result, Alpha Bank was substituted ipso jure, in its capacity as a universal successor, in all assets and liabilities of the Company, while the latter was dissolved without liquidation and ceased to exist, whereas its shares have been delisted from the Athens Stock Exchange (hereinafter “ATHEX”). Alpha Bank’s shares issued in the context of the Merger were admitted to trading to the Main Market of the regulated market of the ATHEX and the shareholders of the Company became shareholders of Alpha Bank with the same number of shares they held prior to the Merger. The hive-down of the banking operations sector in 2021, followed by its transfer to a newly established, wholly owned subsidiary, marked the final step in a series of strategic actions designed to permanently resolve legacy issues. This milestone initiated a four-year period during which the Bank effectively isolated non-performing exposures arising from the financial crisis, thereby significantly enhancing financial resilience. This critical restructuring enabled the Group to restore balance sheet strength, reinforce capital adequacy, and sharpen its strategic focus on core banking activities, client support, and contributing to the recovery of the Greek economy. These efforts were further supported by a disciplined program of targeted acquisitions and partnerships, aimed at accelerating growth and strengthening market positioning. The successful completion of the reverse merger signals the formal transition from a phase of balance sheet restructuring and operational transformation to a new era focused on sustainable value creation, strategic agility, international orientation, and enhanced competitiveness.

Since the beginning of 2025, Alpha Bank's strategic collaboration with UniCredit in mutual fund distribution has continued to evolve successfully. Under the agreement, Alpha Bank distributes UniCredit’s OneMarkets Funds, along with other funds managed by UniCredit or its joint ventures, through its network in Greece. Assets under management in OneMarkets Funds reached Euro 572 million by end-June 2025, up from €242 million at the end of 2024. This growth reflects strong client demand for a curated range of mutual fund solutions, including well-known fund houses such as Fidelity and Capital Group, many of which are exclusively available in the Greek market via Alpha Bank. Client engagement activity across Private Banking and Alpha Gold Personal Banking, combined with joint initiatives such as investment insights, marketing campaigns, the onemarkets.gr platform, and dedicated client events, have contributed to broadening the reach of the OneMarkets Fund offering despite global market volatility in Q2. Looking ahead, Alpha Bank is committed to further strengthening the collaboration with UniCredit through the introduction of additional investment solutions in Q3 and Q4 2025, and by continuing co-branded marketing efforts and thematic client events. This partnership complements Alpha Bank’s open architecture model, which ensures access to a wide range of high-quality investment products, including the Bank’s own asset management solutions and selected third-party offerings

- ✓ Following the completion in November 2024 of the sale transaction of Alpha Bank Romania, by transferring 90.1% of subsidiary’s shares to Unicredit S.p.A, the Group was pursuing on the sale of the subsidiaries Alpha Leasing Romania IFN S.A. and its subsidiary Alpha Insurance Brokers S.R.L. Following a Board of Directors’ approval of an offer received from an investor, the sale of the subsidiaries has been completed on 16.07.2025. The completion of the transaction had no material impact on the Income Statement.

- ✓ On 16.7.2025, Alpha Bank invited holders of its outstanding €500 million dated subordinated fixed rate reset Tier 2 Notes due 11.6.2031 to tender their Notes for cash at a price of 101.75 per cent. As at 24.7.2025, €361.726 million in aggregate principal amount of the Notes were validly tendered, while €138.274 million in aggregate principal amount of the Notes remain outstanding. The loss in p&l from the derecognition of the tendered amount equals €12.6 million.
- ✓ On 23.7.2025, Alpha Bank issued a new subordinated bond with a nominal value of € 500 million maturing on 23.7.2036, callable in 6 years and with a fixed annual coupon of 4.308%, which is adjusted to a new coupon applicable from the call date until maturity, determined on the then prevailing swap rate plus a margin of 1.93%.

2.3.3 EU-Wide 2025 Stress test

On July 5, 2024, the European Banking Authority (EBA) published for informal consultation its draft methodology, templates, and guidance for the 2025 EU-wide stress test. This step marks the beginning of the dialogue with the banking industry and builds upon the methodology used in the 2023 exercise, with improvements reflecting new insights and regulatory changes.On January 20, 2025, the EBA launched the 2025 EU-wide stress test and released the macroeconomic scenarios. The EBA expects to published the results of the exercise on 1st August 2025.

The Stress Test results under the adverse scenario incorporate a conservative 50% pay-out ratio in years where the Bank is making profits. The Bank's CET 1, Tier I and Total capital ratios of December 2027 pro-forma excluding the dividend payments are enhanced by c. 1%.

The fully loaded impact from the new CRR (CRR 3) and new Basel implementation for reference date of 31.12.2024 is very limited, affecting CET 1 by just 0.34%. This compares favorably with the new Basel implementation impact to EU average of c. 1.28%.

In the baseline scenario, the Bank recorded a capital accretion with an increase of the Fully Loaded CET 1 ratio by c. 2.4% in the 3-year horizon, also incorporating a dividend payout of 50% on Profit After Tax.

Since the EU-wide 2023 Stress Test, the Bank has been transformed, significantly strengthening its balance sheet, decisively reducing its stock of NPEs, restoring its organic profitability and successfully building a demonstrable track record of execution in the capital markets through the issuance of capital and MREL instruments while also further enhancing capital and liquidity buffers. In the adverse scenario, the capital depletion of the Fully Loaded CET 1 ratio over the three-year horizon in the adverse scenario is slightly below 2% for the Bank (c. 3.1% in EU-wide 2023 Stress Test) compared favorably to c. 3% for the EBA EU average (c. 4.6% the EBA EU average in the EU-wide 2023 Stress Test).

3 Capital Management

The Group's Risk and Capital Strategy sets specific risk limits, based on management's risk appetite, as well as thresholds to monitor whether actual risk exposure deviates from the limits set.

The Capital Strategy of the Group commits to maintain sound capital adequacy both from economic and regulatory perspective. It aims at monitoring and adjusting the Group's capital levels, taking into consideration capital markets' demand and supply, in an effort to achieve the optimal balance between the economic and regulatory considerations. The objectives of the Group's capital strategy are to ensure that the Group has sufficient capital buffers to cover the risks of its business, to support its growth strategy, comply with regulatory capital requirements and management targets at all times, and to deliver sustainable value to its shareholders.

The Group remains committed to the implementation of its strategy, re-calibrating its approach in order to reflect changes in the market environment and has consistently delivered on its targets to clean-up its balance sheet. The execution of the NPE Business Plan, submitted to the SSM yearly, remains on track through the active management and reduction of NPEs over the Business Plan period.

Main elements impacting Asset Quality, Capital and Liquidity

- ✓ The NPE stock in Greece contracted by €0.1bn q-o-q, bringing the total stock down to €1.4bn at the end of Q2 2025. This reflects the move of an NPE portfolio to the Held for Sale category in view of its expected disposal. NPE formation in Greece stood at €77mn q/q, as €0.2bn of inflows were only partially offset by curings and repayments. The NPE ratio in Greece contracted to 3.4% from 3.7% in Q1 2025 with the Group level NPE ratio at 3.5%.
- ✓ The Group's NPE cash coverage stood at 57% at the end of Q2, while total coverage including collateral reached 132%. The Group NPL coverage ratio stood at 89%, while total coverage including collateral reached 160%
- ✓ The Group's CET 1 Capital base stood at €4.9bn, resulting in a CET1 ratio of 16.1%, post dividend accrual (of 48bps) in the quarter including the profit of the financial reporting period that ended on 30 June 2025 as well as the impact of DTC acceleration.
- ✓ The Group's Loan to Deposit Ratio stands at 80% while the Liquidity Coverage Ratio (LCR) remains stable stood at 194% from the previous quarter, far exceeding regulatory thresholds and management targets.

Distribution of Profits

Alpha Bank S.A. has updated its shareholder remuneration policy following the restoration of profitability. The policy document has been approved by the Board of Directors (BoD) on the Meeting of 31.07.2025. The Policy sets the framework (legal, accounting, regulatory) under which the Bank may proceed to a dividend distribution and is reviewed at least annually in the context of ICAAP and/or as often as necessary in order to reflect amendments in all applicable laws and regulations.

The Group applied and received on 15.05.2025 the approval for the distribution of Euro 281million to its shareholders, corresponding to 43% of Group's net profit for financial year 2024, with a combination of cash (25% of the total distribution amount) and share buyback (75% of the total distribution amount) Based on the above and in view of the capital Business Plan for 2025-2027, the Bank aims to apply a 50% shareholder remuneration ratio on FY2025 Alpha Bank's reported accounting profits after tax on a consolidated basis and at least 50% for the following two years (2026 and 2027 results).

In this context, from 2025 onwards the Bank is committed to accelerate DTC amortization for prudential purposes by voluntarily deducting it from capital ahead of the scheduled timeline. This action will improve Bank's capital quality and increase its strategic options for capital deployment. The acceleration of DTC is set equal to 29% of planned total amount of ordinary shareholder payouts (cash dividend and/or share buyback) removing any DTC dependencies on shareholder remuneration.

Basel IV (CRR3) implementation

Alpha Bank is fully aligned with the CRR3 regulatory framework, having successfully implemented all necessary adjustments across its operations. This includes the seamless integration of CRR3 requirements into the capital requirements calculation system, the comprehensive communication of regulatory changes to all relevant stakeholders, and the effective alignment of customer efficiency metrics. In addition, the Bank has updated its credit policy definitions to reflect the revised CRR3 provisions. Furthermore, the Bank has successfully completed the submission of supervisory reports in accordance with the new regulatory standards. The implementation project was completed on time and to a high standard, demonstrating the Bank's strong commitment to regulatory compliance, operational excellence, and proactive adaptation to evolving supervisory expectations.

As of 1 January 2025, the Capital Requirements Regulation III (CRR3) entered into force across the European Union, introducing significant updates to the prudential framework for credit institutions. These changes aim to strengthen the resilience of the banking sector, improve risk sensitivity and enhance market discipline through more robust and harmonized disclosures.

On 19 June 2024, Regulation 2024/1623/EU (CRR3) and Directive 2024/1619/EU of the European Parliament and of the Council of 31 May 2024, amending Regulation 575/2013/EU and Directive 2013/36/EU, respectively, were published in the Official Journal of the European Union.

3.1 Capital Ratios

The Capital Adequacy Ratio is calculated as the result of the Group's regulatory capital (own funds) to its RWAs. Regulatory capital includes Common Equity Tier 1 (CET1) capital (share capital, reserves, and minority interests), additional Tier 1 capital (AT1) (hybrid securities) and Tier 2 capital (subordinated debt). RWAs include the credit risk of the banking book, the market risk of the trading book, the operational risk, the counterparty credit risk (CCR) and credit valuation adjustment (CVA).

As shown in the following table, on 30.06.2025, Group's CET1 stood at €4.9 billion and the total Regulatory Capital at €6.6 billion, while the total RWAs amounted to €30.6billion resulting in a CET1 ratio of 16.1%, and total Capital Adequacy Ratio of 21.7% mainly due to the H1 2025 profitability which also includes a provision for the distribution of a total amount of Euro c.259 million and the DTC acceleration by an amount equal to 29% of accrued shareholders remuneration starting from 01.01.2025.

Template 1: Capital Adequacy Ratios (%)(*)

(Amounts in millions of Euro)

	a	b
	30.06.2025	**31.03.2025**
Capital Type		
CET1	4,921	5,027
Tier 1 Capital	5,621	5,727
Tier 2 Capital	1,017	1,028
Total Regulatory Capital for C.A.R. calculation	6,638	6,755
Risk Weighted Assets	30,604	30,426
Capital Ratios		
CET1 Ratio	**16.1%**	**16.5%**
Tier 1 Ratio	**18.4%**	**18.8%**
Capital Adequacy Ratio (Tier 1 + Tier 2)	**21.7%**	**22.2%**

(*) including period profits post a provision for the distribution according to the dividend policy

Greek law 4302/2014 introduced Article 27A to the Greek Income Tax Code, which was initially replaced by Greek law 4303/2014 and then by Greek law 4340/2015 and was most recently amended by Greek law 4549/2018, 4722/2020 and, most recently, 4831/2021 ("DTA Framework"), to allow, under certain conditions, from 2016 onwards, credit institutions to convert DTAs falling within the scope of such law and arising (a) from the participation in the PSI and the buy-back programme and (b) from the sum of (i) the unamortized part of the crystallized loan losses from write-offs and disposals, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other general losses, with respect to existing amounts up to 30 June 2015, into final and due receivables from the Hellenic Republic ("Tax Credit"). In the case of an accounting loss in a specific year, the Tax Credit will be calculated by multiplying the total amount as per the above of the deferred tax asset by the percentage represented by the accounting losses over net equity before such year's losses as appearing in the annual financial statements of the credit institution, excluding such year's accounting losses.

This legislation allows Greek credit institutions to treat such eligible DTAs as not "relying on future profitability" according to the CRD Directive, and as a result such DTAs are not deducted from Common Equity Tier I capital but rather risk weighted. As of 30 June 2025, the eligible amounts not "relying on future profitability" according to the CRD Directive stood at €2.33 billion.

3.1.1 Key metrics

In the following table EU KM1 key regulatory metrics and ratios are provided as well as related input components as defined by the amended versions of CRR and CRD. They comprise own funds, RWAs, capital ratios, additional requirements based on SREP, capital buffer requirements, leverage ratio, liquidity coverage ratio and net stable funding ratio.

Template 2: EU KM1 - Key metrics template as of 30.06.2025(*)

(Amounts in millions of Euro)

		a	b	B	d	e
		30.06.2025	**31.03.202**	**31.12.2024**	**30.09.2024**	**30.06.2024**
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) Capital	4.921	5.027	4.921	4.840	4.787
2	Tier 1 capital	5.621	5.727	5.621	5.540	5.187
3	Total capital	6.638	6.755	6.632	6.533	6.155
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	30.604	30.426	30.279	31.247	32.387
4a	Total risk exposure pre-floor	30.604	30.426			
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	16,08%	16,52%	16,25%	15,49%	14,78%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	16,08%	16,52%			
6	Tier 1 ratio (%)	18,37%	18,82%	18,56%	17,73%	16,02%
6b	Tier 1 ratio considering unfloored TREA (%)	18,37%	18,82%			
7	Total capital ratio (%)	21,69%	22,20%	21,90%	20,91%	19,00%
7b	Total capital ratio considering unfloored TREA (%)	21,69%	22,20%			
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3,00%	3,00%	3,00%	3,00%	3,00%
EU 7e	of which: to be made up of CET1 capital (percentage points)	1,69%	1,69%	1,69%	1,69%	1,69%
EU 7f	of which: to be made up of Tier 1 capital (percentage	2,25%	2,25%	2,25%	2,25%	2,25%
EU 7g	Total SREP own funds requirements (%)	11,00%	11,00%	11,00%	11,00%	11,00%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2,50%	2,50%	2,50%	2,50%	2,50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0,00%	0,00%	0,00%	0,00%	0,00%
9	Institution specific countercyclical capital buffer (%)	0,21%	0,21%	0,19%	0,26%	0,23%
EU 9a	Systemic risk buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
10	Global Systemically Important Institution buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 10a	Other Systemically Important Institution buffer	1,00%	1,00%	1,00%	1,00%	1,00%
11	Combined buffer requirement (%)	3,71%	3,71%	3,69%	3,76%	3,73%
EU 11a	Overall capital requirements (%)	14,71%	14,71%	14,69%	14,76%	14,73%
12	CET1 available after meeting the total SREP own funds requirements (%)	9,89%	10,34%	10,07%	9,30%	7,77%
	Leverage ratio					
13	Leverage ratio total exposure measure	74.581	74.323	71.684	74.198	72.637
14	Leverage ratio	7,54%	7,71%	7,84%	7,47%	7,14%
	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total					

		a	b	B	d	e
		30.06.2025	31.03.202	31.12.2024	30.09.2024	30.06.2024
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14c	Total SREP leverage ratio requirements (%)	3,00%	3,00%	3,00%	3,00%	3,00%
EU 14d	Leverage ratio buffer requirement (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14e	Overall leverage ratio requirements (%)	3,00%	3,00%	3,00%	3,00%	3,00%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	16.156	16.031	15.782	15.719	15.672
EU 16a	Cash outflows - Total weighted value	9.323	9.357	9.424	9.507	9.525
EU 16b	Cash inflows - Total weighted value	944	1.043	1.158	1.194	1.238
16	Total net cash outflows (adjusted value)	8.379	8.315	8.266	8.313	8.287
	Liquidity coverage ratio (%) (adjusted values) (**)	193,0%	193,0%	191,0%	189,0%	189,2%
17	Liquidity coverage ratio (%)	194,0%	193,6%	203,2%	189,8%	192,3%
	Net Stable Funding Ratio					
18	Total available stable funding	53.200	52.224	52.598	54.566	53.152
19	Total required stable funding	43.265	41.944	42.006	42.124	41.752
20	NSFR ratio (%)	123,0%	124,5%	125,2%	129,5%	127,3%

(*) including period profits post a provision for the distribution according to the dividend policy

(**) average figures based on previous monthly data points

The analysis of Own funds structure is presented in the following table:

Template 3: Own Funds Structure (*)

(Amounts in millions of Euro)

	30.06.2025	31.03.2025
Share capital	671	683
Share premium	5.909	4.784
Own Shares	(225)	(295)
Retained Earnings and Other Reserves	838	2.046
o/w FVOCI reserves	2	(6)
Period results	253	109
Common equity tier 1 capital before regulatory adjustments 1-5	**7.447**	**7.327**
1.PVA	(4)	(4)
2.Intangible assets	(336)	(373)
3.DTA amortization	(1.943)	(1.672)
4.Irrevocable payment commitment	(30)	(30)

5.Other Adjustments	(213)	(221)
Total regulatory adjustments to common equity tier 1	**(2.526)**	**(2.300)**
Common equity tier 1 capital (CET1) (1)	**4.921**	**5.027**
Additional Tier I instruments	700	700
Additional Tier I before regulatory adjustments	**700**	**700**
Additional Tier I	**700**	**700**
Tier I Capital (CET1 + AT1)	**5.621**	**5.727**
Subordinated loan	1.017	1.028
Tier II capital before regulatory adjustments	**1.017**	**1.028**
Tier II capital	**1.017**	**1.028**
Total Capital (TC = Tier I + Tier II)	**6.638**	**6.755**
Total RWA	**30.604**	**30.426**
Common equity tier 1 Ratio	**16,1%**	**16,5%**
Tier I Ratio	**18,4%**	**18,8%**
Capital Adequacy Ratio (Tier I + Tier II)	**21,7%**	**22,2%**

(*) including period profits post a provision for the distribution according to the dividend policy

3.2 Reconciliation of regulatory own funds to the balance sheet according to IFRS

The table below highlights the difference in the basis of consolidation for accounting and prudential purposes as it compares the carrying values as reported under IFRS with the carrying values under the scope of the regulatory consolidation. References in the last column of the table provide the mapping of regulatory balance sheet items used to calculate regulatory capital. The reference-columns presented below provides the mapping to the references-columns as presented in the template “EU CC1– Composition of regulatory own funds”.

Template 4a: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	**Under regulatory scope of consolidation**	**Reference**
		30.06.2025		
Assets - *Breakdown by asset classes according to the balance sheet in the published financial statements*				
1	Cash and balances with central banks	3.101	3.101	
2	Due from financial institutions	2.297	2.297	
3	Trading securities	139	139	
4	Derivative financial assets	517	517	
5	Loans and advances to customers	40.997	40.996	

		a	b	c
		Balance sheet as in published financial statements	**Under regulatory scope of consolidation**	**Reference**
		30.06.2025		
6	Investment securities			
	- Measured at fair value through other comprehensive income	1.123	1.123	
	- Measured at amortised cost	15.739	15.718	
	- Measured at fair value through profit or loss	231	231	
8	Investments in associates and joint ventures	569	570	(g)
9	Investment property	317	317	
10	Property, plant and equipment	545	545	
11	Goodwill and other intangible assets	396	396	(d)
12	Deferred tax assets	4.975	4.979	(e)
13	Other assets	947	948	
14	Assets classified as held for sale	1.585	392	
15	**Total assets**	**73.478**	**72.269**	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published financial statements*				
1	Due to banks	7.330	7.330	
2	Derivative financial liabilities	713	713	
3	Due to customers	51.306	51.310	
4	Debt securities in issue and other borrowed funds	3.038	3.074	(f)
5	Liabilities for current income tax	72	71	
6	Deferred tax liabilities	14	14	(e)
7	Employee defined benefit obligations	24	24	
8	Other liabilities	1.037	1.038	
9	Provisions	145	145	
10	Liabilities related to assets classified as held for sale	1.174	1	
11	**Total liabilities**	64.853	63.720	
Equity				
1	Share Capital	671	671	(a)
2	Share premium	5.909	5.909	(a)
3	Merge Reserve	(1.125)	(1.125)	
5	Other equity instruments	700	700	(h)
6	Reserves	(25)	(35)	(c)
7	Amounts directly recognized in equity and associated with assets classified as held for sale	(16)	(1)	
8	Retained earnings	2.493	2.412	(b)
9	Treasury shares	(1)	(1)	(a)
10	Non-controlling interests	19	19	
11	**Total equity**	8.625	8.549	

Template 4b: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	**Under regulatory scope of consolidation**	**Reference**
		31.12.2024		
Assets - *Breakdown by asset classes according to the balance sheet in the published financial statements*				
1	Cash and balances with central banks	2.998	2.998	
2	Due from financial institutions	2.296	2.296	
3	Trading securities	53	53	
4	Derivative financial assets	628	628	
5	Loans and advances to customers	39.050	39.051	
6	Investment securities			
	- Measured at fair value through other comprehensive income	1.009	1.009	
	- Measured at amortised cost	16.420	16.398	
	- Measured at fair value through profit or loss	167	167	
7	Investments in associates and joint ventures	570	570	(g)
8	Investment property	290	290	
9	Property, plant and equipment	534	534	
10	Goodwill and other intangible assets	438	438	(d)
11	Deferred tax assets	4.815	4.820	(e)
12	Other assets	808	818	
13	Assets classified as held for sale	1.999	839	
14	**Total assets**	72.075	70.909	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published financial statements*				
1	Due to banks	6.533	6.533	
2	Derivative financial liabilities	793	794	
3	Due to customers	51.032	51.037	
4	Debt securities in issue and other borrowed funds	3.208	3.245	(f)
5	Liabilities for current income tax	69	69	
6	Deferred tax liabilities	18	19	(e)
7	Employee defined benefit obligations	24	23	
8	Other liabilities	895	895	
9	Provisions	161	162	
10	Liabilities related to assets classified as held for sale	1.153	1	

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2024		
11	**Total liabilities**	63.886	62.778	
Equity				
1	Share Capital	682	682	(a)
2	Share premium	4.784	4.784	(a)
3	Other equity instruments	700	700	(h)
4	Reserves	(93)	(96)	(c)
5	Amounts directly recognized in equity and associated with assets classified as held for sale	(14)	(1)	
6	Retained earnings	2.175	2.107	(b)
7	Treasury shares	(61)	(61)	(a)
8	Non-controlling interests	16	16	
9	**Total equity**	8.189	8.131	

3.3 Capital requirements under Pillar I

The Group calculates and reports to the designated authorities its capital requirements (Pillar I RWAs) according to the provisions of the CRR and implementing the Technical Standards developed by the EBA on a solo and consolidated basis.

The approaches adopted for the calculation of the capital requirements under Pillar I (advanced or standardized methodologies) are determined by the general policy of the Group in conjunction with factors such as the nature and type of risks the Group undertakes, the level and complexity of the Group's business and other factors such as the degree of readiness of the information and software systems.

The Group operating under the standardized approach for certain risk categories, has incorporated the following CRR3-driven changes into its disclosures.

- ✓ **Credit risk:** Under the standardized approach the CRR3 introduces new exposure classes, revises the scope of existing exposure classes and requires a more granular approach to the treatment of different credit risk exposures such as exposures to institutions, retail exposures (e.g. transactor exposure, currency mismatches), exposures secured by real estate (e.g. ADC, IPRE), among others.
- ✓ **Market risk**: A Value at Risk (VaR) model developed at a bank level for the significant exposures and approved by the Bank of Greece. Additionally, the Bank uses the Standardized approach to calculate Market Risk for the remaining, non-significant exposures. The CRR3 revises criteria for assigning positions to the trading book vs the banking book and sets adjusted approaches available for banks to calculate their related capital requirements (among others, the simplified standardised approach), among others. The amendments for market risk (Fundamental review of the trading book - FRTB) have been delayed by Commission Delegated Regulation (EU) 2024/2795 until January 1, 2027.
- ✓ **CVA risk**: Revision of the credit valuation adjustment (CVA) framework and the application of the reduced version of the basic approach (BA-CVA).

- ✓ **Operational risk**: The CRR3 introduces a new Standardised Approach (SA) for determining capital requirements related to operational risk. This is a unified, non-model-based method that replaces all earlier approaches, including the Basic Indicator Approach (BIA), the Standardised Approach (SA), and the Advanced Measurement Approach (AMA). Under the new framework, capital requirements are determined using a Business Indicator (BI), which represents the size and scale of an institution's operations by incorporating elements of income and expenses. The BI is calculated as the average value over the preceding three years.

The following template summarizes RWA and minimum capital requirements by risk type. Minimum capital requirement is calculated at 8% of RWA.

Template 5: EU OV1 – Overview of risk weighted exposure amounts as of 30.06.2025

(Amounts in millions of Euro)

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		30.06.2025(*)	31.03.2025	30.06.2025
1	**Credit risk (excluding CCR)**	**25.595**	**25.467**	**2.048**
2	Of which the standardised approach	25.595	25.467	2.048
3	Of which the foundation IRB (FIRB) approach			
4	Of which slotting approach			-
EU 4a	Of which equities under the simple risk weighted approach			-
5	Of which the advanced IRB (AIRB) approach	-		-
6	**Counterparty credit risk - CCR**	**221**	**207**	**18**
7	Of which the standardised approach	193	174	15
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	8	11	1
9	Of which other CCR	20	22	2
10	Credit valuation adjustments risk - CVA risk	47	37	4
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	47	37	4
EU 10c	Of which the simplified approach	-	-	-
15	**Settlement risk**	**-**		**-**
16	**Securitisation exposures in the non-trading book (after the cap)**	**661**	**718**	**53**
17	Of which SEC-IRBA approach			-
18	Of which SEC-ERBA (including IAA)	253	277	20
19	Of which SEC-SA approach	408	441	33
EU 19a	Of which 1250%			-
20	**Position, foreign exchange and commodities risks (Market risk)**	**452**	**340**	**36**

21	Of which the Alternative standardised approach (A-SA)			
21a	Of which the Simplified standardised approach (S-SA)	169	144	14
22	Of which the Alternative Internal Models Approach (A-IMA)			-
EU 22a	Large exposures	**-**		**-**
23	Reclassifications between trading and non-trading books	**-**	**-**	
24	**Operational risk**	**3.630**	**3.630**	**290**
EU 24a	Exposures to crypto-assets	**-**	**-**	
25	**Amounts below the thresholds for deduction (subject to 250% risk weight)** (for information)	**1.802**	**1.787**	**144**
26	Output floor applied (%)	0	-	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	**Total**	**30.604**	**30.399**	**2.448**

(*) including period profits post a provision for distribution according to the dividend policy.

Group's CET1 Ratio includes specific prudential adjustments in accordance with Article 3 of CRR and the expectations of regulatory authorities, including those related to exposures guaranteed by the Greek state. Specifically, for the exposures guaranteed by the Greek state, the Bank made a prudential adjustment of € 84 million as of June 30, 2025, in alignment with the guidelines issued by the ECB to banks at the beginning of 2024. This adjustment is temporary and depends, among other factors, on the progress of payments from the Greek state (based on the new Law 5104/24). The book value of these exposures, recognized in the "Loans and receivables from customers" account, amounted to € 97million as of June 30, 2025, and, in accordance with ECB guidelines, were classified as non-performing exposures (NPE) and accordingly as Stage 3 loans.

3.4 Capital Buffers

The countercyclical capital buffer (CCyB) is a CRD IV instrument, designed to help counter pro-cyclicality in the financial system. Credit institutions are required to set aside additional CET 1 capital during periods of excessive credit growth. This will help maintain the supply of credit and dampen the downswing of the financial cycle. The main purpose of the CCyB is to increase the banks' resilience in good times to absorb potential losses that could arise in a downturn and to support the continued supply of credit to the real economy. In October 2025, the Bank of Greece, as the National Competent Authority, will set the countercyclical buffer at 0.5% from 0%.

Key drivers of the rise of the CCyB requirements are the increases of the respective exposures in Cyprus (1%) & the United Kingdom (2%), where the Group has exposures due to its subsidiaries.

Total Risk exposure amount in the following tables includes General Credit (excluding CCR) and Securitization exposures.

ALPHA BANK

Template 6a: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010	Breakdown by country:													
10	United Kingdom	1.509					1.509	79			79	982	4%	2,00%
11	Cyprus	1.447					1.447	77			77	967	4%	1,00%
12	Romania	687					687	46			46	577	3%	1,00%
13	Ireland	329					329	22			22	278	1%	1,50%
14	Netherlands	295					295	17			17	208	1%	2,00%
15	France	294					294	17			17	207	1%	1,00%
16	Deutschland	116					116	7			7	90	0%	0,80%
17	Other	30.536		63	76.729	4.520	111.848	1.416	40	53	1.509	18.865	85%	
18	Total	35.213		63	76.729	4.520	116.525	1.681	40	53	1.774	22.174	100%	

Template 6b: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010	Breakdown by country:													
10	Cyprus	1.149					1.149	58			58	723	3%	1,00%
11	United Kingdom	1.133					1.133	58			58	728	3%	2,00%
12	Romania	616					616	32			32	394	2%	1,00%
13	Netherlands	301					301	19			19	232	1%	2,00%
14	Ireland	295					295	20			20	249	1%	1,50%
15	France	294					294	21			21	266	1%	1,00%
16	Deutschland	133					133	8			8	98	1%	0,80%
17	Other	29.044		75	60.032	5.448	94.599	1.401	30	61	1.492	18.651	87%	
18	Total	32.965		75	60.032	5.448	98.519	1.617	30	61	1.707	21.341	100%	

The following table presents an overview of institution - specific countercyclical exposure and buffer requirements.

Template 7a: EU CCyB2 - Amount of institution-specific countercyclical capital buffer as of 30.06.2025

(Amounts in millions of Euro)

		a
		30.06.2025
1	Total risk exposure amount	30.604
2	Institution specific countercyclical capital buffer rate	0,21%
3	Institution specific countercyclical capital buffer requirement	65,4

The following table presents an overview of institution - specific countercyclical exposure and buffer requirements.

Template 7b: EU CCyB2 - Amount of institution-specific countercyclical capital buffer as of 31.12.2024

(Amounts in millions of Euro)

		a
		31.12.2024
1	Total risk exposure amount	30.279
2	Institution specific countercyclical capital buffer rate	0,19%
3	Institution specific countercyclical capital buffer requirement	57,0

4 Leverage

The leverage ratio, which is defined as Tier 1 capital divided by total exposure, is a binding requirement with the application of the CRR II package, as of June 2021. The “risk of excessive leverage” means the risk that results from an institution's vulnerability due to leverage or contingent leverage that may require unintended corrective measures to its business plan, including distressed selling of assets which might result in losses or in valuation adjustments to its remaining assets.

The level of the leverage ratio with reference date 30.06.2025 on consolidated basis was 7.54%, according to the transitional definition of Tier 1 capital, exceeding by 2.51x the 3% minimum threshold applied by the competent authorities, implying that the Bank is not taking on excessive leverage risk.

The Bank submits to the regulatory authorities the leverage ratio on a quarterly basis and monitors the level and the factors that affect the ratio.

The table below provides a reconciliation of the total exposure measure with the total assets disclosed in published financial statements.

Template 8a: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 30.06.2025

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	73.478
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(1.209)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	1.228
9	Adjustment for securities financing transactions (SFTs)	35
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	3.655
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	
EU-11a	(Adjustment for exposures excluded total exposure measure in accordance with point (ca) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(2.607)
13	**Total exposure measure**	**74.581**

Template 8b: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 31.12.2024

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	72.075
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(1.167)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	1.141
9	Adjustment for securities financing transactions (SFTs)	40
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2.384
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(2.790)
13	**Total exposure measure**	**71.684**

The following template presents a breakdown of the components of the leverage exposure, the minimum requirements and buffers.

Template 9: EU LR2 - LRCom: Leverage ratio common disclosure as of 30.06.2025

(Amounts in millions of Euro)

		CRR leverage ratio exposures	
		a	b
		30.06.2025	**31.12.2024**
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	70.379	69.238
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	9	6
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(228)	(584)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-

		CRR leverage ratio exposures	
		a	b
		30.06.2025	31.12.2024
6	(Asset amounts deducted in determining Tier 1 capital)	(2.367)	(2.208)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**67.794**	**66.452**
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	1.615	1.551
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	270	271
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original exposure method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	**Total derivatives exposures**	**1.885**	**1.822**
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1.212	985
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)		
16	Counterparty credit risk exposure for SFT assets	35	40
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	**Total securities financing transaction exposures**	**1.247**	**1.025**
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	10.836	10.287
20	(Adjustments for conversion to credit equivalent amounts)	(7.181)	(7.903)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	**Off-balance sheet exposures**	**3.655**	**2.384**
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-

		CRR leverage ratio exposures	
		a	b
		30.06.2025	31.12.2024
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according of Article 429a(1), point (da) CRR)	-	
EU-22l	(Excluded deducted in accordance with point (q) of Article 429a(1) CRR)	-	
EU-22m	**(Total exempted exposures)**	**-**	**-**
	Capital and total exposure measure		
23	**Tier 1 capital**	5.621	5.621
24	**Total exposure measure**	**74.581**	**71.684**
	Leverage ratio		
25	Leverage ratio	7,54%	7,84%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7,54%	7,84%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	0,00%	7,84%
26	Regulatory minimum leverage ratio requirement (%)	3,00%	3,00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%
EU-26b	of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%
27	Leverage ratio buffer requirement (%)	0,00%	0,00%
EU-27a	Overall leverage ratio requirement (%)	3,00%	3,00%
	Choice on transitional arrangements and relevant exposures		
EU-27	Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional

Template 10a: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 30.06.2025

(Amounts in millions of Euro)

		a
		CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	70.379
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	70.379
EU-4	Covered bonds	39
EU-5	Exposures treated as sovereigns	21.874
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	417
EU-7	Institutions	1.536
EU-8	Secured by mortgages of immovable properties	9.841
EU-9	Retail exposures	3.389
EU-10	Corporate	18.155
EU-11	Exposures in default	928
EU-12	Other exposures * (eg equity, securitisations, and other non-credit obligation assets)	14.199

(*) Loans classified as held for sale (HFS) are reported within their original COREP regulatory exposure classes (e.g. *Exposures in default*), unless they have been derecognised for prudential purposes, and are therefore no longer classified under the asset class *Other Items*, as their credit risk characteristics remain aligned with those of their original exposure classes despite their accounting reclassification.

Template 10b: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 31.12.2024

(Amounts in millions of Euro)

		a
		CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	68.660
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	68.660
EU-4	Covered bonds	39
EU-5	Exposures treated as sovereigns	21.364
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	360
EU-7	Institutions	1.974
EU-8	Secured by mortgages of immovable properties	9.697
EU-9	Retail exposures	3.141
EU-10	Corporate	16.420
EU-11	Exposures in default	874
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	14.792

Alpha Bank monitors and submits to the regulatory authorities the leverage ratio, as defined in Regulation (EU) No 2015/62 of October 10th 2014, on a quarterly basis and monitors the level and the factors that affect the ratio.

5 Credit Risk

Credit risk arises from the potential failure of borrowers or counterparties to meet all or part of their payment obligations to the Group. The primary objective of the Group's strategy for the credit risk management in order to maximize the risk adjusted return, is the continuous, timely and systematic monitoring of the loan portfolio and the maintenance of the credit exposures within the framework of acceptable overall risk undertaking limits. At the same time, the conduct of daily business within a clearly defined framework of granting credit, supported by specific credit criteria, is ensured. The Group's credit risk management framework is being developed based on a series of credit policies and procedures, as well as systems and models for measuring, monitoring and controlling credit risk. These models are subject to an ongoing review process, in order to ensure full compliance with the current institutional and regulatory framework and their adaptation to the respective economic conditions and to the nature and extent of the Group's business.

The Group identifies and assesses existing and potential risks inherent in any product or activity as the basis for effective credit risk management. The identification, analysis and control of credit risk are achieved through a safety net of internal procedures, policies and controls.

Template 11a: EU CR1-A: Maturity of exposures 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	108	6.091	18.173	16.624	-	40.997
2	Debt securities	-	1.759	5.961	9.163	-	16.882
3	**Total**	**108**	**7.850**	**24.135**	**25.787**	**-**	**57.879**

Template 11b: EU CR1-A: Maturity of exposures 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	103	7.010	17.661	14.276	-	39.050
2	Debt securities	-	1.505	6.311	9.591	-	17.407
3	**Total**	**103**	**8.515**	**23.972**	**23.867**	**-**	**56.457**

Template 12a: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 30.06.2025

(Amounts in millions of Euro)

		a	c	e	f
		Gross carrying amount		Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted		
010	Agriculture, forestry and fishing	178	6	(1)	-
020	Mining and quarrying	23	4	(2)	-
030	Manufacturing	4.056	118	(58)	-
040	Electricity, gas, steam and air conditioning supply	3.260	1	(2)	-
050	Water supply	43	0	(0)	-
060	Construction	888	37	(22)	-
070	Wholesale and retail trade	3.281	127	(56)	-
080	Transport and storage	5.029	23	(5)	-
090	Accommodation and food service activities	3.196	21	(11)	-
100	Information and communication	377	3	(2)	-
110	Financial and insurance activities	291	0	(0)	-
120	Real estate activities	1.847	26	(18)	-
130	Professional, scientific and technical activities	512	2	(2)	-
140	Administrative and support service activities	464	7	(4)	-
150	Public administration and defense, compulsory social security	1	0	(0)	-
160	Education	79	2	(0)	-
170	Human health services and social work activities	149	3	(2)	-
180	Arts, entertainment and recreation	77	2	(1)	-
190	Other services	243	9	(39)	-
200	**Total**	**23.994**	**388**	**(226)**	**-**

Template 12b: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 31.12.2024

(Amounts in millions of Euro)

		a	c	e	f
		Gross carrying amount		Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted		
010	Agriculture, forestry and fishing	251	6	(2)	-
020	Mining and quarrying	21	4	(1)	-
030	Manufacturing	3.636	150	(78)	-
040	Electricity, gas, steam and air conditioning supply	3.067	1	(1)	-
050	Water supply	42	1	(0)	-
060	Construction	834	31	(15)	-
070	Wholesale and retail trade	3.167	140	(66)	-
080	Transport and storage	5.142	25	(7)	-
090	Accommodation and food service activities	3.053	23	(12)	-
100	Information and communication	364	3	(2)	-
110	Financial and insurance activities	242	0	(0)	-
120	Real estate activities	1.738	15	(8)	-
130	Professional, scientific and technical activities	496	2	(2)	-
140	Administrative and support service activities	465	7	(4)	-
150	Public administration and defense, compulsory social security	1	0	(0)	-
160	Education	80	1	(0)	-
170	Human health services and social work activities	129	3	(2)	-
180	Arts, entertainment and recreation	77	2	(1)	-
190	Other services	243	7	(42)	-
200	**Total**	**23.045**	**421**	**(245)**	**-**

The tables below present the credit quality of the Group's exposures broken down by significant geographical area as of 30.06.2025 and 31.12.2024.

Template 13a: EU CQ4: Quality of non-performing exposures by geography as of 30.06.2025

(Amounts in millions of Euro)

		a	c	e	f	g
		Gross carrying/nominal amount		Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted			
010	***On-balance-sheet exposures***	***60.764***	***1.536***	***(780)***		***(5)***
020	*Greece*	37.822	1.390	(691)		(5)
030	*United Kingdom*	2.064	38	(23)		-
040	*Romania*	777	0	(6)		-
050	*Cyprus*	1.896	67	(40)		-
070	*Other countries*	18.204	41	(20)		-
080	***Off-balance-sheet exposures***	***10.836***	***200***		***24***	
090	*Greece*	10.017	196		21	
100	*United Kingdom*	21	0		0	
110	*Romania*	1	0		0	
120	*Cyprus*	330	3		3	
140	*Other countries*	468	0		0	
150	**Total**	**71.600**	**1.736**	**(780)**	**24**	**(5)**

Template 13b: EU CQ4: Quality of non-performing exposures by geography as of 31.12.2024

(Amounts in millions of Euro)

		a	c	e	f	g
		Gross carrying/nominal amount		Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted			
010	***On-balance-sheet exposures***	***59.225***	***1.567***	***(742)***		***(5)***
020	*Greece*	37.101	1.473	(686)		(5)
030	*United Kingdom*	2.084	23	(13)		-
040	*Romania*	708	0	(6)		-
050	*Cyprus*	1.626	25	(13)		-
070	*Other countries*	17.706	46	(24)		-
080	***Off-balance-sheet exposures***	***10.285***	***200***		***24***	
090	*Greece*	9.684	198		22	
100	*United Kingdom*	33	0		0	
110	*Romania*	0	0		0	
120	*Cyprus*	187	1		2	
140	*Other countries*	381	0		0	
150	**Total**	**69.510**	**1.767**	**(742)**	**24**	**(5)**

The following tables provide an overview of the credit quality of forborne exposure.

Template 14a: EU CQ1: Credit quality of forborne exposures as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne						Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	1.246	707	707	707	(42)	(165)	1.549	485
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	0	-	-	-	(0)	-	0	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	0	0	0	-	(0)	0	0
060	*Non-financial corporations*	266	162	162	162	(6)	(50)	349	109
070	*Households*	980	545	545	545	(36)	(115)	1.199	377
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	1	0	0	0	0	-	0	0
100	**Total**	**1.246**	**707**	**707**	**707**	**(42)**	**(165)**	**1.549**	**485**

Template 14b: EU CQ1: Credit quality of forborne exposures as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	1.724	764	764	764	(66)	(183)	1.960	509
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	0	0	0	-	(0)	0	0
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	322	160	160	160	(11)	(42)	393	110
070	*Households*	1.403	605	605	605	(56)	(141)	1.567	399
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	1	-	-	-	0	-	0	-
100	**Total**	**1.725**	**764**	**764**	**764**	**(66)**	**(183)**	**1.960**	**509**

ALPHA BANK

Template 15a: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	2.827	2.827	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	42.405	42.279	126	1.531	517	160	166	129	139	45	376	1.531
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	60	60	-	0	-	-	0	0	-	-	0	0
040	*Credit institutions*	2.149	2.149	-	70	-	-	-	-	-	-	70	70
050	*Other financial corporations*	8.215	8.215	0	0	0	-	-	0	0	-	0	0
060	*Non-financial corporations*	23.606	23.569	37	388	158	21	28	25	38	10	109	388
070	*Of which SMEs*	8.409	8.378	31	299	98	21	28	25	22	8	98	299
080	*Households*	8.374	8.286	88	1.072	359	140	138	104	101	35	196	1.072
090	Debt securities	16.822	16.822	-	5	-	-	-	-	5	-	-	5
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	13.742	13.742	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	1.909	1.909	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	32	32	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	1.139	1.139	-	5	-	-	-	-	5	-	-	5
150	Off-balance-sheet exposures	10.636			200								200
160	*Central banks*	-			-								-
170	*General governments*	204			-								-
180	*Credit institutions*	922			-								-
190	*Other financial corporations*	571			0								0
200	*Non-financial corporations*	7.405			196								196
210	*Households*	1.535			3								3
220	**Total**	**72.690**	**61.929**	**126**	**1.736**	**517**	**160**	**166**	**129**	**144**	**45**	**376**	**1.736**

ALPHA BANK

Template 15b: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	2.781	2.781	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	40.266	40.125	141	1.561	557	142	153	126	135	58	390	1.561
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	62	62	-	1	0	0	0	-	0	-	0	1
040	*Credit institutions*	2.016	2.016	-	70	-	-	-	-	-	-	70	70
050	*Other financial corporations*	6.942	6.942	-	0	0	-	0	0	0	0	0	0
060	*Non-financial corporations*	22.624	22.596	28	421	168	24	30	19	32	17	131	421
070	*Of which SMEs*	8.001	7.974	27	355	109	24	30	18	31	15	128	355
080	*Households*	8.622	8.509	113	1.069	389	117	123	108	103	41	189	1.069
090	Debt securities	17.391	17.391	-	7	-	-	-	7	-	-	-	7
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	13.606	13.606	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	1.819	1.819	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	805	805	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	1.161	1.161	-	7	-	-	-	7	-	-	-	7
150	Off-balance-sheet exposures	10.085			200								200
160	*Central banks*	-			-								-
170	*General governments*	201			-								-
180	*Credit institutions*	924			-								-
190	*Other financial corporations*	536			0								0
200	*Non-financial corporations*	6.928			197								197
210	*Households*	1.495			3								3
220	**Total**	**70.524**	**60.297**	**141**	**1.767**	**557**	**142**	**153**	**133**	**135**	**58**	**390**	**1.767**

Template 16a: EU CR1: Performing and non-performing exposures and related provisions as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair						Accumulated partial write-off	Collateral and financial	
		Performing exposures			Non-performing exposures			Performing exposures –			Non-performing exposures –				On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	Cash balances at central banks and other demand deposits	2.827	2.827	-	-	-	-	(0)	(0)	-	-	-	-		-	-
010	Loans and advances	42.405	38.000	3.044	1.531	-	1.296	(181)	(68)	(90)	(580)	-	(504)	(1.406)	29.150	921
030	*General governments*	60	60	0	0	-	0	(0)	(0)	(0)	(0)	-	(0)	(1)	15	0
040	*Credit institutions*	2.149	2.149	0	70	-	70	(0)	(0)	-	(70)	-	(70)	-	-	-
050	*Other financial corporations*	8.215	7.629	1	0	-	0	(2)	(2)	(0)	(0)	-	(0)	(27)	6.049	0
060	*Non-financial corporations*	23.606	21.778	1.659	388	-	334	(76)	(44)	(29)	(150)	-	(119)	(569)	16.591	216
070	*Of which SMEs*	8.409	7.522	851	299	-	265	(28)	(6)	(20)	(110)	-	(91)	(490)	5.936	170
080	*Households*	8.374	6.384	1.384	1.072	-	891	(102)	(21)	(60)	(359)	-	(314)	(809)	6.495	706
090	Debt securities	16.822	16.812	-	5	-	5	(16)	(16)	-	(4)	-	(4)	-	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	13.742	13.742	-	-	-	-	(12)	(12)	-	-	-	-	-	-	-
120	*Credit institutions*	1.909	1.909	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
130	*Other financial corporations*	32	23	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-
140	*Non-financial corporations*	1.139	1.139	-	5	-	5	(2)	(2)	-	(4)	-	(4)	-	-	-
150	Off-balance-sheet exposures	10.636	10.317	316	200	-	200	(2)	(2)	(1)	(22)	-	(22)		977	34
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	204	203	1	-	-	-	(0)	(0)	(0)	-	-	-		0	-
180	*Credit institutions*	922	913	9	-	-	-	(1)	(1)	(0)	-	-	-		-	-
190	*Other financial corporations*	571	562	9	0	-	0	(0)	(0)	(0)	(0)	-	(0)		14	-
200	*Non-financial corporations*	7.405	7.162	240	196	-	196	(1)	(1)	(0)	(22)	-	(22)		917	34
210	*Households*	1.535	1.477	57	3	-	3	(0)	(0)	(0)	(0)	-	(0)		47	0
220	**Total**	**72.690**	**67.957**	**3.360**	**1.736**	**-**	**1.501**	**(199)**	**(85)**	**(90)**	**(606)**	**-**	**(530)**	**(1.406)**	**30.127**	**955**

Template 16b: EU CR1: Performing and non-performing exposures and related provisions as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair						Accumulated partial write-off	Collateral and financial	
		Performing exposures			Non-performing exposures			Performing exposures –			Non-performing exposures –				On performing exposures	On non-
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	Cash balances at central banks and other demand deposits	2.781	2.781	-	-	-	-	(0)	(0)	-	-	-	-		-	-
010	Loans and advances	40.266	35.584	3.250	1.561	-	1.325	(197)	(65)	(104)	(526)	-	(450)	(1.431)	28.627	908
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	62	62	0	1	-	1	(0)	(0)	(0)	(1)	-	(1)	(1)	16	0
040	*Credit institutions*	2.016	2.016	-	70	-	70	(0)	(0)	-	(70)	-	(70)	-	-	-
050	*Other financial corporations*	6.942	6.345	1	0	-	0	(2)	(2)	(0)	(0)	-	(0)	(26)	5.646	0
060	*Non-financial corporations*	22.624	20.984	1.461	421	-	370	(81)	(48)	(30)	(165)	-	(139)	(558)	16.318	228
070	*Of which SMEs*	8.001	7.181	781	355	-	307	(29)	(5)	(21)	(141)	-	(115)	(525)	5.638	191
080	*Households*	8.622	6.178	1.787	1.069	-	885	(114)	(15)	(74)	(291)	-	(241)	(846)	6.646	680
090	Debt securities	17.391	17.381	-	7	-	7	(15)	(15)	-	(5)	-	(5)	-	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	13.606	13.606	-	-	-	-	(11)	(11)	-	-	-	-	-	-	-
120	*Credit institutions*	1.819	1.819	-	-	-	-	(2)	(2)	-	-	-	-	-	-	-
130	*Other financial corporations*	805	794	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-
140	*Non-financial corporations*	1.161	1.161	-	7	-	7	(2)	(2)	-	(5)	-	(5)	-	-	-
150	Off-balance-sheet exposures	10.085	9.745	337	200	-	200	(2)	(2)	(1)	(21)	-	(21)		935	33
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	201	200	1	-	-	-	(0)	(0)	(0)	-	-	-		0	-
180	*Credit institutions*	924	914	10	-	-	-	(1)	(1)	(0)	-	-	-		-	-
190	*Other financial corporations*	536	527	9	0	-	0	(0)	(0)	(0)	(0)	-	(0)		13	-
200	*Non-financial corporations*	6.928	6.662	264	197	-	197	(1)	(1)	(0)	(21)	-	(21)		882	33
210	*Households*	1.495	1.442	53	3	-	3	(0)	(0)	(0)	(0)	-	(0)		40	0
220	**Total**	**70.524**	**65.491**	**3.586**	**1.767**	**-**	**1.532**	**(214)**	**(82)**	**(104)**	**(552)**	**-**	**(476)**	**(1.431)**	**29.563**	**941**

Template 17a: EU CR2: Changes in the stock of non-performing loans and advances as of 30.06.2025

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	1.561
020	Inflows to non-performing portfolios	478
030	Outflows from non-performing portfolios	(508)
040	Outflows due to write-offs	(79)
050	Outflow due to other situations	(428)
060	**Final stock of non-performing loans and advances**	1.531

Template 17b: EU CR2: Changes in the stock of non-performing loans and advances as of 31.12.2024

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	2.309
020	Inflows to non-performing portfolios	857
030	Outflows from non-performing portfolios	(1.606)
040	Outflows due to write-offs	(125)
050	Outflow due to other situations	(1.480)
060	**Final stock of non-performing loans and advances**	1.561

Template 18a EU CR5 – standardised approach as of 30.06.2025

(Amounts in millions of Euro)

	Exposure classes	Risk weight																								Total	Of which unrated
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Others	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa
1	Central governments or central banks	21.823	-	-	90	6	-	-	-	-	-	-	-	-	-	-	2.338	-	-	-	-	684	-	-	-	-	24.941	20.885
2	Non-central governments public central entities	594	-	-	-	12	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	644	
EU 2a	Regional governments or local authorities	-	-	-	-	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12	12
EU 2b	Public sector entities	594	-	-	-	0	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	632	632
3	Multilateral development banks	1.081	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.081	1.081
EU 3a	International organisations	358	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	358	
4	Institutions	342	-	-	-	398	440	-	5	-	608	-	-	-	-	-	150	-	-	-	0	-	-	-	-	-	1.942	1.271
5	Covered bonds	-	-	-	39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	39	
6	Corporates	-	-	-	-	4.541	-	-	-	-	4.138	-	-	2.097	773	-	5.689	-	-	357	510	-	-	-	-	-	18.105	12.349
6,1	Of which: Specialised Lending	-	-	-	-	706	-	-	-	-	891	-	-	234	773	-	1.054	-	-	357	37	-	-	-	-	-	4.051	3.400
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	815	-	-	-	91	37	-	-	-	-	943	
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	91	-	-	-	-	-	91	
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	815	-	-	-	-	37	-	-	-	-	852	
8	Retail exposures	-	-	-	-	-	-	-	-	714	-	-	-	2.253	-	-	-	-	-	-	-	-	-	-	-	-	2.967	
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	4.620	145	88	-	31	-	2.354	-	870	-	82	251	1	69	17	664	-	-	-	-	505	9.698	
9,1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	4.620	-	-	-	-	-	-	-	637	-	-	86	-	-	-	6	-	-	-	-	-	5.348	
9.1.1	**No loan splitting applied**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9.1.2	loan splitting applied (secured)	-	0	-	-	-	-	-	-	-	-	-	-	637	-	-	86	-	-	-	6	-	-	-	-	-	728	
9.1.3	loan splitting applied (unsecured)	-	-	-	-	4.620	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.620	
9,2	Secured by mortgages on residential immovable property - IPRE	-	0	-	-	-	145	88	-	31	-	2	-	-	-	-	-	1	-	-	76	-	-	-	-	-	343	
9,3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-	-	2.353	-	233	-	-	166	-	-	17	59	-	-	-	-	-	2.828	
9.3.1	No loan splitting applied	-	0	-	-	-	-	-	-	-	-	-	-	0	-	-	0	-	-	-	0	-	-	-	-	-	0	
9.3.2	loan splitting applied (secured)	-	0	-	-	-	-	-	-	-	-	-	-	233	-	-	166	-	-	17	59	-	-	-	-	-	476	
9.3.3	loan splitting applied (unsecured)	-	0	-	-	-	-	-	-	-	-	2.353	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.353	
9,4	Secured by mortgages on commercial immovable property - IPRE	-	0	-	-	-	-	-	-	-	-	-	-	-	-	82	-	-	69	-	172	-	-	-	-	505	828	
9,5	Acquisition, Development and Construction (ADC)	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	352	-	-	-	-	-	352	
10	Exposures in default	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	676	-	-	-	244	-	-	-	-	-	920	
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	16	-	-	-	-	-	-	-	-	-	16	16
EU 10c	Other items	386	0	-	-	-	-	-	-	-	-	-	-	-	-	-	1.762	-	-	-	-	-	-	-	-	-	2.147	2.147
17	**TOTAL**	**24.583**	**0**	**-**	**129**	**9.576**	**585**	**88**	**5**	**745**	**4.746**	**2.354**	**-**	**5.221**	**773**	**82**	**11.735**	**1**	**69**	**374**	**1.510**	**721**	**-**	**-**	**-**	**505**	**63.801**	

Template 18b EU CR5 – standardised approach as of 31.12.2024

(Amounts in millions of Euro)

	Exposure classes	Risk weight															Total	Of which unrated
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1	Central governments or central banks	20.998	-	-	-	11	-	-	-	-	2.419	-	678	-	-	-	24.106	
2	Regional government or local authorities	-	-	-	-	12	-	-	-	-	-	-	-	-	-	-	12	
3	Public sector entities	561	-	-	-	0	-	-	-	-	37	-	-	-	-	-	598	
4	Multilateral development banks	1.007	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.007	
5	International organisations	362	-	-	-	-	-	-	-	-	-	-	-	-	-	-	362	
6	Institutions	341	-	-	-	670	-	789	-	-	560	-	-	-	-	-	2.359	
7	Corporates	-	-	-	-	3.924	-	3.757	-	-	7.739	555	-	-	-	-	15.975	
8	Retail exposures	-	-	-	-	-	-	-	-	2.551	-	-	-	-	-	-	2.551	
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	5.725	2.914	-	514	465	2	-	-	-	-	9.621	
10	Exposures in default	-	-	-	-	-	-	-	-	-	724	79	-	-	-	-	803	
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	165	-	-	-	-	165	
12	Covered bonds	-	-	-	39	-	-	-	-	-	-	-	-	-	-	-	39	
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Units or shares in collective investment undertakings	0	-	-	-	-	-	-	-	-	12	-	-	-	-	-	12	
15	Equity exposures	-	-	-	-	-	-	-	-	-	787	-	45	-	-	-	832	
16	Other items	448	-	-	-	-	-	-	-	-	2.183	-	-	-	-	-	2.632	
17	**TOTAL**	**23.718**	**-**	**-**	**39**	**4.616**	**5.725**	**7.461**	**-**	**3.065**	**14.925**	**802**	**722**	**-**	**-**	**-**	**61.073**	

5.1 Credit risk mitigation

Credit risk mitigation techniques reduce exposure value and expected loss. According to CRR 575/2013, only specific types of credit risk mitigation are eligible for capital adequacy calculation purposes.

Moreover, the Bank of Greece sets additional criteria which should be satisfied during the collateral management process (market value monitoring, insurance, legal validity) and the terms and conditions of the relevant agreements.

5.1.1 Collateral valuation and management policies and procedures

Collateral can be used in order to mitigate the Credit Risk created to a financial instrument in case a customer or counterparty fails to meet his contractual obligations.

Collaterals are holdings or rights of every type provided to the Bank by its debtors or third parties to be used as additional funding sources in case of claim liquidation.

The main collateral types held for retail customers are mortgages, cash, mutual funds and sovereign securities (repos, bonds). Additionally, in case of real estate loans maximum Loan to Value (LTV: loan amount to property commercial value) limits have been set, depending upon loan purpose and collateral. The amount the customer contributes to the asset being financed is a very important factor during the loan approval process since it directly affects customer's repayment ability.

In case the debtor is a private individual, the Group seeks to have her/him insured against death and severe injuries.

As far as wholesale customers are concerned, loan repayment depends upon the viability and growth perspectives of the company, the servicing ability of the company and its owners, the circumstances prevailing at the sectors and markets they are active in, as well as unexpected factors, positively or negatively affecting their operation.

In order to assess an acceptable value for collateral, the Bank calculates the value based on the potential proceeds that could arise if and when this collateral is liquidated. This estimation is referred to as the acceptable value of the collaterals provided to the Bank for the determination of which the quality of the assets as well as their market value are taken into account. In this way, the ratio of acceptable values is determined for each type of collateral, those are expressed as a percentage of their market value, nominal or weighted value, depending on the type of collateral. Depending on the type of collateral, the assessments of the value of collateral is carried out by partners (Appraisers), with the necessary expertise and specialisation. The selection of the appraiser is subject to specific criteria, while their performance is assessed on an ongoing basis.

Especially for tangible collaterals, the Bank entrusts independent qualified appraisers who have the necessary qualifications, ability and experience in evaluation (as defined in the article 208 paragraph 3 of the EU Regulation No 575/2013).
According to the Bank's Credit Policy, the existence and the valuation of both pledged collateral and mortgaged property are closely monitored. The frequency of the valuation varies according to the right or asset on which the pledge may be registered, up to a maximum of one year.

In addition to the review of collateral values, the Bank also validates such collateral values on an annual basis. On a regular basis and through proper sampling, the Bank performs audits for the procedures of implementation of the Group's Loan Collateral Policy and audits (back-testing) for the verification of property valuations. Audits are based on indices and individual assessments in order to ensure the proper collateral valuation is captured in the Bank's core systems and controls are in place for the Bank's relevant committee reviews and approvals.

Regarding the rest of the companies of Alpha Bank Group, apart from the general principles applying to the Group as a whole, additional clauses also exist. To specify, as far as leasing contracts are concerned, apart from the leased property, Alpha Leasing might request additional collateral. Moreover, Factoring customers are subject to collateral limits depending upon debtor's creditworthiness and reexamined according to the Bank's Policy regarding loans to corporate customers.

5.1.2 Description of the main collateral types

Collateral used to mitigate risk, both for mortgage and other lending is diversified. The main types of guarantors are corporates, individuals, financial institutions and sovereigns. Their creditworthiness is assessed on a case by-case basis.

There are two broad categories of collateral: Contractual collaterals – guarantees and tangible collaterals.

Guarantees are the most common collateral type of the first category. A guarantee is a legally enforceable relationship between the Bank and the borrower, through which the guarantor assumes the responsibility of paying the debt. It is documented and presupposes the existence of another legally enforceable relationship between the Bank and the borrower (loan).

Provided guarantees are usually found in banking practice in the following forms: Personal Guarantee, Corporate Guarantee, Credit Institutions Guarantee, Greek State Guarantee, Guarantee of HDB (Hellenic Development Bank), Guarantee Programs of the European Investment Fund (EIF) and Letter of Comfort. The most common types of tangible collateral are: mortgages on real estate properties and pledges on commodities, deposits and cheques or claims and receivables.

Tangible collateral value is estimated on a regular basis, at least annually, except for cases where the contract foresees something different, in cases of known changes on the property or in the business process, or in cases there are urban planning changes or other considerable factors; in case of exceptional/unforeseen events, additional valuation can take place. In case of significant negative changes at collateral values, the Bank seeks to restore the loan to collateral value ratio to the desired levels. The initial valuations of a real estate property, provided as collateral, are carried out through on-site appraisals and internal property inspections to further improve the effect of credit risk mitigation. The Bank requests that all mortgages are covered by an insurance contract and the compensation is assigned to the Bank. The same might apply, on a case-by-case basis, on other physical collaterals as well.

The following table presents the exposure value covered through eligible collateral and guarantees / credit derivatives for each asset class, based on regulatory standards while it also shows the volume of unsecured and secured exposures. Secured exposures are limited to those exposures against which eligible collateral which meets CRR definitions is held and has been used in the calculation of the Group's capital requirements. Haircuts are applied consistent with CRR requirements.

Exposures where the Group nets derivative mark-to-market positions with certain interbank counterparties against cash collateral placed and received with those counterparties under CSA agreements are excluded. For cash collateral held against derivative exposures refer to the counterparty credit risk section.

Template 19a: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 30.06.2025

(Amounts in millions of Euro)

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	15.931	30.071	21.666	8.406	-
2	Debt securities	16.828	-	-	-	
3	**Total**	**32.759**	**30.071**	**21.666**	**8.406**	**-**
4	*Of which non-performing exposures*	615	921	756	165	-
EU-5	*Of which defaulted*	615	921			

Template 19b: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 31.12.2024

(Amounts in millions of Euro)

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	14.350	29.535	21.848	7.687	-
2	Debt securities	17.398	-	-	-	
3	**Total**	**31.748**	**29.535**	**21.848**	**7.687**	**-**
4	*Of which non-performing exposures*	660	908	719	189	-
EU-5	*Of which defaulted*	660	908			

Template 20a: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 30.06.2025

(Amounts in millions of Euro)

	Exposure classes	Exposures before CCF		Exposures post CCF and		RWAs and RWAs	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	19.376	228	24.713	228	4.057	16,27%
2	Non-central government public sector entities	417	2	643	1	40	6,28%
EU 2a	Regional government or local authorities	11	1	11	0	2	20,00%
EU 2b	Public sector entities	406	1	632	0	38	6,02%
3	Multilateral development banks	198	-	1.081	0	-	0,00%
EU 3a	International organisations	358	-	358	-	-	0,00%
4	Institutions	1.536	811	1.537	405	667	34,37%
5	Covered bonds	39	-	39	-	4	10,00%
6	Corporates	18.155	6.627	15.954	2.151	10.750	59,37%
6,1	Of which: Specialised Lending	5.302	63	4.026	25	2.189	54,04%
7	Subordinated debt exposures and equity	943	-	943	-	1.045	110,75%
EU 7a	Subordinated debt exposures	91	-	91	-	136	150,00%
EU 7b	Equity	852	-	852	-	908	106,56%
8	Retail	3.389	2.873	2.658	309	1.837	61,91%
9	Secured by mortgages on immovable property and ADC exposures	9.841	95	9.656	42	4.375	45,11%
9,1	Secured by mortgages on residential immovable property - non IPRE	5.351	25	5.336	12	1.454	27,18%
9,2	Secured by mortgages on residential immovable property - IPRE	347	0	343	0	161	47,01%
9,3	Secured by mortgages on commercial immovable property - non IPRE	2.908	41	2.810	19	1.605	56,73%
9,4	Secured by mortgages on commercial immovable property - IPRE	857	12	823	5	628	75,93%
9,5	Acquisition, Development and Construction (ADC)	379	16	346	6	528	150,00%
10	Exposures in default	928	176	862	57	1.042	113,28%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	0,00%
EU 10b	Collective investment undertakings	16	-	16	-	16	98,26%
EU 10c	Other items *	2.147	-	2.147	-	1.762	82,04%
12	**TOTAL**	**57.344**	**10.812**	**60.608**	**3.194**	**25.595**	**40,12%**

(*) Loans classified as held for sale (HFS) are reported within their original COREP regulatory exposure classes (e.g. *Exposures in default*), unless they have been derecognised for prudential purposes, and are therefore no longer classified under the asset class *Other Items*, as their credit risk characteristics remain aligned with those of their original exposure classes despite their accounting reclassification.

Template 20b: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 31.12.2024

(Amounts in millions of Euro)

	Exposure classes	Exposures before CCF		Exposures post CCF and		RWAs and RWAs	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	19.112	195	24.106	-	4.115	17,07%
2	Regional government or local authorities	12	1	12	0	2	20,00%
3	Public sector entities	349	1	598	0	37	6,19%
4	Multilateral development banks	185	-	1.007	-	-	0,00%
5	International organisations	362	-	362	-	-	0,00%
6	Institutions	1.974	912	1.975	385	1.088	46,12%
7	Corporates	16.420	6.159	14.612	1.363	10.121	63,35%
8	Retail	3.141	2.761	2.388	163	1.771	69,41%
9	Secured by mortgages on immovable property	9.697	56	9.604	17	3.933	40,88%
10	Exposures in default	874	178	779	23	842	104,93%
11	Exposures associated with particularly high risk	191	-	165	-	248	150,00%
12	Covered bonds	39	-	39	-	4	10,00%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0,00%
14	Collective investment undertakings	12	-	12	-	12	98,17%
15	Equity	832	-	832	-	899	108,08%
16	Other items	2.632	-	2.632	-	2.183	82,96%
17	**TOTAL**	**55.830**	**10.264**	**59.122**	**1.951**	**25.255**	**41,35%**

Template 21a: EU CQ7: Collateral obtained by taking possession and execution processes as of 30.06.2025

(Amounts in millions of Euro)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	35	(10)
020	Other than PP&E	645	(128)
030	*Residential immovable property*	231	(21)
040	*Commercial Immovable property*	407	(107)
050	*Movable property (auto, shipping, etc.)*	0	-
060	*Equity and debt instruments*	7	(0)
070	*Other collateral*	-	-
080	**Total**	**680**	**(139)**

Template 21b: EU CQ7: Collateral obtained by taking possession and execution processes as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	35	(10)
020	Other than PP&E	667	(132)
030	*Residential immovable property*	230	(23)
040	*Commercial Immovable property*	430	(108)
050	*Movable property (auto, shipping, etc.)*	0	-
060	*Equity and debt instruments*	7	(1)
070	*Other collateral*	-	-
080	**Total**	**702**	**(141)**

6 Counterparty credit risk (CCR)

Counterparty credit risk is the risk of default of a counterparty before the final settlement of all existing transactions' cash flows. An economic loss would occur if the portfolio of transactions with the counterparty has a positive economic value to the Group at the time of counterparty default. According to CRR 575/2013 the term transaction refers to:

 Over the counter (OTC) derivative transactions, such as FX or interest rate derivative transactions

 Repurchase transactions, securities or commodities lending or borrowing transactions or margin lending transactions

Long settlement transactions

Alpha Bank Group has the first two types of transactions.

The exposures generating counterparty credit risk are monitored on a daily basis. The Group has set limits per counterparty group, per counterparty and per product.

In order to reduce counterparty credit risk exposure, Alpha Bank Group uses ISDA (International Swap and Derivatives Association) and GMRA (Global Master Repurchase Agreement) bilateral contracts for financial products transactions with financial institutions.

Since 30/06/2021 Alpha Bank Group has adopted the Standardised approach for counterparty credit risk (SA-CCR), the new methodology for calculating the EAD under CRR II, which is significantly different to its predecessor, the CEM under the CRR I. The SA-CCR is more risk sensitive compared to the prescribed approaches under CRR I, thus is expected to provide an EAD value which better reflects the risks to which Banks are exposed to as a result of derivative transactions.

The tables below present the Group's counterparty credit exposures, including the impact of netting and collateral. Current credit exposures consist of the replacement cost of contracts together with potential future credit exposure.

Template 22a: EU CCR1 – Analysis of CCR by approach as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	**Potential future exposure (PFE)**	**EEPE**	**Alpha used for computing regulatory exposure value**	**Exposure value pre-CRM**	**Exposure value post-CRM**	**Exposure value**	**RWEA**
EU1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	195	193		1.4	1.007	543	543	193
2	IMM (for derivatives and SFTs)			-		-	-	-	-
2a	*Of which securities financing transactions netting sets*			-		-	-	-	-
2b	*Of which derivatives and long settlement transactions netting sets*			-		-	-	-	-
2c	*Of which from contractual cross-product netting sets*			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					5.573	35	35	20
5	VaR for SFTs					-	-	-	-
6	**Total**					**6.580**	**578**	**578**	**213**

Template 22b: EU CCR1 – Analysis of CCR by approach as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	**Potential future exposure (PFE)**	**EEPE**	**Alpha used for computing regulatory exposure value**	**Exposure value pre-CRM**	**Exposure value post-CRM**	**Exposure value**	**RWEA**
EU1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	204	194		1.4	1.060	556	556	223
2	IMM (for derivatives and SFTs)			-		-	-	-	-
2a	*Of which securities financing transactions netting sets*			-		-	-	-	-
2b	*Of which derivatives and long settlement transactions netting sets*			-		-	-	-	-
2c	*Of which from contractual cross-product netting sets*			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					4.319	40	40	24
5	VaR for SFTs					-	-	-	-
6	**Total**					**5.378**	**596**	**596**	**247**

According to CRR 575/2013 Article 381, financial institutions are required to calculate the own funds requirements for Credit Valuation Adjustment (CVA Risk).

The CVA reflects the current market value of the counterparty credit risk to the institution. Own Funds requirements for CVA risk, are calculated for all derivative transactions with financial institutions all OTC derivative instruments excluding credit derivatives.

In order to calculate CVA, Alpha Bank incorporates the Standardized methodology according to article 384 of CRR 575/2013. Value at Risk is calculated with a 99% confidence interval and with one-year risk horizon.

The most important factors that influence the capital requirements of CVA are the Weight of the counterparty, the real notional-weighted maturity, the contribution of the exposures to the counterparties as well as the number of the counterparties of the portfolio.

The tables below present the Group's exposures to central counterparties (CCPs) and related capital requirements.

Template 23a: EU CCR8 – Exposures to CCPs as of 30.06.2025

(Amounts in millions of Euro)

		a	b
		Exposure value	**RWEA**
1	**Exposures to QCCPs (total)**		**8**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	398	8
3	(i) OTC derivatives	398	8
4	(ii) Exchange-traded derivatives	-	
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	-	
8	Non-segregated initial margin	70	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	**Exposures to non-QCCPs (total)**		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

Template 23b: EU CCR8 – Exposures to CCPs as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		Exposure value	**RWEA**
1	**Exposures to QCCPs (total)**		**7**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	370	7
3	(i) OTC derivatives	370	7
4	(ii) Exchange-traded derivatives	-	
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	91	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	**Exposures to non-QCCPs (total)**		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

The tables below show the CCR exposures by regulatory portfolio and risk as of 30.06.2025 and 31.12.2024.

Template 24a: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
	Exposure classes	**Risk weight**											**Total exposure value**
		0%	**2%**	**4%**	**10%**	**20%**	**50%**	**70%**	**75%**	**100%**	**150%**	**Others**	
1	Central governments or central banks	69	-	-	-	-	-	-	-	-	-	-	69
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	109	398	-	-	26	9	-	-	1	-	59*	603
7	Corporates	13	-	-	-	55	170	-	34	73	17	8**	371
8	Retail	-	-	-	-	-	-	-	6	-	-	-	6
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**191**	**398**	**-**	**-**	**81**	**180**	**-**	**40**	**74**	**17**	**67**	**1.048**

(*) RW 30%

(**) RW 130%

Template 24b: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
	Exposure classes	**Risk weight**											**Total exposure value**
		0%	**2%**	**4%**	**10%**	**20%**	**50%**	**70%**	**75%**	**100%**	**150%**	**Others**	
1	Central governments or central banks	28	-	-	-	-	-	-	-	-	-	-	28
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	114	370	-	-	27	93	-	-	-	-	-	604
7	Corporates	-	-	-	-	46	192	-	-	79	13	-	330
8	Retail	-	-	-	-	-	-	-	5	-	-	-	5
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	0	-	-	0
11	**Total exposure value**	**141**	**370**	**-**	**-**	**73**	**285**	**-**	**5**	**79**	**13**	**13**	**967**

The following tables provide a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions or to securities financing transaction (SFTs) as of 30.06.2025 and 31.12.2024.

Template 25a: EU CCR5 – Composition of collateral for CCR exposures 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
	Collateral type	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	457	297	282	225	-	4.401	-	4.015
2	Cash – other currencies	0	-	1	1	-	-	-	-
3	Domestic sovereign debt	-	-	-	265	-	65	-	6
4	Other sovereign debt	-	-	-	-	-	190	-	24
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	130
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	614	-	1.120
9	**Total**	**458**	**297**	**283**	**492**	**-**	**5.270**	**-**	**5.295**

Template 25b: EU CCR5 – Composition of collateral for CCR exposures 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
	Collateral type	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	229	338	336	268	-	-	-	1.168
2	Cash – other currencies	1	-	0	-	-	-	-	-
3	Domestic sovereign debt	-	2	-	255	-	104	-	39
4	Other sovereign debt	-	-	-	-	-	156	-	122
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	492	-	121
7	Equity securities	-	-	-	-	-	-	-	32
8	Other collateral	-	-	-	-	-	3.368	-	2.628
9	**Total**	**230**	**340**	**336**	**523**	**-**	**4.120**	**-**	**4.109**

7 Exposure to Securitisation positions

According to the provisions set by points (a) to (i) of Article 449 of Regulation (EU) 575/2013 CRR regarding Exposures to securitisation positions, the Group provides details of traditional and synthetic securitization exposures in the banking and trading book.

7.1 Traditional Securitisations

In accordance with article 4(37) of the Banking Consolidation Directive (Definitions), traditional securitization entails the economic transfer of the exposures being securitized under a securitisation special purpose entity which in return issues securities. This must be accomplished by the transfer of ownership of the securitized exposures from the originator. Securities issued by the securitization SPVs do not represent any payment obligations of the originator institution.

Project "Galaxy"

On 22 June 2021, Alpha Bank completed the Galaxy transaction, which involved the securitization of a portfolio of Non-Performing Exposures (NPEs) with a total gross book value of c. €10.8bn as of cut-off date, following fulfillment of all conditions' precedent, as per the securitization framework. The portfolio was segmented to three distinct securitization SPVs based on the underlying assets' type:

a) Orion X Securitisation DAC, consists of secured residential Mortgages of total gross book value c. €1.9bn., as of 31.03.2019

b) Galaxy II Funding DAC, consists of secured residential Mortgages and Consumer Loans and Small Business Lending ("SBL") of total gross book value c. €5.7bn as of 30.06.2019, and

c) Galaxy IV Funding DAC, consists of wholesale exposures to SMEs and Large corporates of total gross book value c. €3.2bn as of 30.06.2019, and

Following the implementation of Alpha Bank SA's demerger by way of hive down of the banking sector with the incorporation of a new banking entity under the name Alpha Bank, the said entity retained 100% of the Senior Notes, which are guaranteed from the State under the Hellenic Asset Protection Scheme ("HAPS" – refer below). The holding entity resulted from the aforementioned corporate action, namely Alpha Services & Holdings, sold the 51% of the Mezzanine and Junior Notes of the securitisation SPVs (Galaxy subordinated Notes) to an entity managed and advised by Davidson Kempner Capital Management LP ("Davidson Kempner"), in accordance with the definitive agreement entered on 22.2.2021. Alpha Bank also retains 5% of Galaxy subordinated Notes, pursuant to the provisions of the securitization law. As part of the overall Galaxy transaction, an entity managed by Davidson Kempner acquired 80% of Cepal Services & Holdings SMSA, whose subsidiary, Cepal Hellas Financial Services Single Member, was assigned as the long-term servicer of Galaxy portfolio.

Project "Cosmos"

Following the completion of Galaxy transaction, Alpha Bank expedited the deleveraging opportunities of its remaining NPE pool through inorganic actions in accordance to its NPE Business Plan, initiating within 2021 the disposal of an additional portfolio of Greek NPEs, in the form of a rated securitization named Project Cosmos, which alike Project Galaxy, utilized the provisions of HAPS. The Cosmos portfolio consisted of predominantly secured Residential Mortgage loans, Large Corporate, Small and Medium Enterprises ("SMEs"), Small Business Lending ("SBL") of c.€3.4bn, in terms of gross book value, as of 30.6.2020, which were securitized under a single securitization special purpose entity. The transaction was completed on 17 December 2021 and consisted on the sale of 51% of Mezzanine and Junior Notes (subordinated Cosmos Notes) to an entity managed and advised by Davidson Kempner, while Alpha Bank retained 100% of the Senior Notes along with 5% of the subordinated Cosmos Notes, pursuant to the risk retention requirements of article 6 of the Securitisation Regulation.

In 2022, the 44% of Galaxy & Cosmos Class B (Mezzanine) Notes as well as the 44% of Galaxy & Cosmos Class C (Junior) Notes, which had been retained by the Alpha Services & Holdings, were contributed to Galaxy Cosmos Mezz Plc. Consequently, Alpha Bank Group currently retains the 5% of Galaxy & Cosmos Mezzanine and Junior Notes.

Project "Gaia"

Consistent with the objectives set out in its NPE Business Plan, Alpha Bank advanced the deleveraging of its residual non-performing exposure (NPE) portfolio through selected inorganic transactions. As part of this strategy, the Bank executed a rated securitisation transaction, named Project Gaia, encompassing a portfolio of Greek NPEs with a total gross book value of approximately c. €1.1bn as of the cut-off date. Following the fulfilment of all conditions precedent stipulated in the securitisation framework, the transaction — structurally comparable to Projects Galaxy and Cosmos — was implemented under the provisions of the Hellenic Asset Protection Scheme (HAPS). The underlying portfolio was segmented into two distinct securitisation special purpose vehicles (SPVs), each reflecting the specific characteristics of the respective asset types:

a) Gaia Securitisation DAC, consists of secured residential Mortgages of total gross book value c. €0.5bn., as of 30.06.2025

b) Gaia Securitisation II DAC, consists of Small Business Lending ("SBL") of total gross book value c. €0.6bn., as of 30.06.2025,

The transaction was completed on 06 June 2025 and consisted on the sale of 95% of Mezzanine and Junior Notes (subordinated Gaia I & II Notes) to preferred investors, while Alpha Bank retained 100% of the Senior Notes along with 5% of the subordinated Gaia Securitization Notes, pursuant to the risk retention requirements of article 6 of the Securitisation Regulation.

In accordance with Art. 247 of the CRR, and given that Galaxy, Cosmos & Gaia transactions are traditional non-STS securitizations and SRT requirements are fulfilled, Alpha Bank can exclude the underlying exposures from its calculation of risk-weighted exposure amounts, and calculate the risk-weighted exposure amounts for the positions it holds in the securitizations. Specifically, Alpha Bank uses the SEC-SA method for the calculation of risk-weighted exposure amounts for mezzanine and junior securitisation notes according to EU 2017/2401 Art. 261. However, it must be noted that, as per EU 2017/2401 Art. 254 (2):

For rated positions or positions in respect of which an inferred rating may be used, an institution shall use the SEC-ERBA instead of the SEC-SA in each of the following cases:

(a) where the application of the SEC-SA would result in a risk weight higher than 25 % for positions qualifying as positions in an STS securitisation;

(b) where the application of the SEC-SA would result in a risk weight higher than 25 % or the application of the SEC-ERBA would result in a risk weight higher than 75 % for positions not qualifying as positions in an STS securitisation;

(c) for securitisation transactions backed by pools of auto loans, auto leases and equipment leases.

Since the SEC-SA application results in a risk-weight for a senior securitisation position (prior to any adjustment) above the thresholds of 25% and 75% respectively, the risk-weight of a senior securitisation position shall be calculated with the SEC-ERBA methodology upon the availability of a rating report from one recognized ECAI.

In the context of their application under Hercules ”Asset Protection Scheme (“HAPS”), Galaxy,Gaia and Cosmos senior securitisation positions received a rating from a recognized ECAI.

Hellenic Republic Asset Protection Scheme

In December 2019, the Greek parliament voted for the creation of an Asset Protection Scheme (“APS”) (Greek Law 4649/2019, as currently in force) also known as the “Hercules Scheme”. The Hercules Scheme was an HFSF strategic initiative, implemented by the Ministry of Finance, designed to support banks on deleveraging NPEs through securitisation, with the aim of obtaining greater market stability. Under the Hercules Scheme, an individually managed, private securitization vehicle buys NPEs from the bank and disposes notes to investors. The State then provides a guarantee for the senior, less risky notes of the securitization vehicle. In exchange for such guarantee, the State receives a commission at market terms. The Hercules Scheme becomes effective only when the originator has sold at least 50% plus one of junior tranches (and mezzanine if any) and such notes are of such amount that allows the derecognition and the Significant Risk Transfer ("SRT") of the securitized receivables. The Hercules Scheme was initially extended in April 2021 under the “Hercules II” programme and further extended in December 2023 under the “Hercules III” programme, pursuant to Greek law 5072/2023,

and it was expected to run for 12 months, until December 2024. “Hercules III” programme was further extended until June 30, 2025, following European Commission approval while the budget for the guarantee programme was also increased from €2 to €3 billion.

Greek banks are expected to continue to reap the benefits of the Hercules Scheme while, the Greek State will continue to provide guarantees up to €32bn on the senior tranches of securitisations.

Investment in securitisation positions

On June 30th, 2025, the Group held investments in collateralized loan obligations ("CLOs") with a total carrying amount of € 727 mn.

7.2 Synthetic Securitisations

In synthetic securitisation, the ownership of the securitised exposures remains with the originator and the transfer of the credit risk of an asset portfolio risk is achieved by the use of credit derivatives or guarantees (mainly Credit Default Swaps (CDS) or Financial Guarantees). An institution which implements a synthetic securitisation, may elect to structure the transaction either with the use of an SSPE or not. In the first case, the SSPE issues a Note only for the protected portion of the securitised pool which is purchased by investors and then the institution and the SSPE conclude a credit derivative or financial guarantee agreement. In the second case, the institution issues directly the Note equivalent to the protected portion of the securitised pool and enters into a credit derivative or financial guarantee with the investor.

The Bank, as an originator institution, has completed four synthetic securitisations, which are comprised of performing corporate/SME exposures (Aurora, Blue, Eleven and Tokyo) as well as another one based on performing shipping exposures (Project Compass). Bank retains at least 5% of each of the securitized exposures in compliance with the retention rule laid down by the supervisory regulations.

Aurora, Compass, Blue and Eleven securitisation transactions achieve Significant Risk Transfer (SRT), as well as Simple, Transparent and Standardised (STS) designation, which enhances risk-weighted exposure amounts relief. With respect to the transactions' structure, the Bank has entered into a Financial Guarantee for the protection of the Mezzanine Tranche with an SSPE (Protection Seller). In turn, the SSPEs have issued an equivalent Credit Linked Note purchased by the investors. Regarding Eleven's structure, the Bank has issued directly a Credit Linked Note subscribed by an investor acting act as funded credit protection for the hedged tranche.

Tokyo securitisation transaction achieves Significant Risk Transfer (SRT) which enhances risk-weighted exposure amounts relief. Tokyo securitisation consists of the Bank entering into a Financial Guarantee agreement with the Guarantor (EIF/EIB), through which any credit losses that pertain to the First Loss Tranche (c. 4.4 mn as of 30/06/2025) of the portfolio will be covered. The Guarantee is issued directly by the EIF/EIB and there is no SPV involved. Moreover, as the Guarantor in Tokyo is a Supranational, there is no requirement for the Guaranteed Amount to be collateralized.

The Bank applies the SEC-SA method to calculate the capital requirements for synthetic securitisations. In accordance with article 247 of Regulation (EU) 2401/2017 and given that the relevant SRT requirements are fulfilled, Bank can exclude the underlying exposures from its calculation of risk-weighted exposure amounts and calculate the risk-weighted exposure amounts for the positions it holds in the securitisation. Specifically, the Bank uses the SEC-SA method for the calculation of risk-weighted exposure amounts according to articles 261 and 262 of Regulation (EU) 2401/2017 for the transactions that are designated as STS (Aurora, Compass, Blue and Eleven). Any losses initially realized in the portfolio of securitised loans, will be covered by the Junior Tranches and retained SES (applicable only in Aurora). The Junior tranches as well as Aurora's SES are deducted from CET I Capital as the alternative provided by Regulation (EU) 575/2013 Art. 36.1 (k).

The template EU SEC1 below presents the total non-trading book securitization exposure split by exposure type that is securitized as either originator or sponsor and finally positions which have been purchased through investment activities as investor.

Template 26a: EU-SEC1 - Securitisation exposures in the non-trading book as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
		Traditional				Synthetic		Sub-total	Traditional			Sub-total	Traditional			Sub-total
		STS		Non-STS												
			of which SRT		of which SRT		of which SRT		STS	Non-STS	Synthetic		STS	Non-STS	Synthetic	
1	**Total exposures**	**-**	**-**	**3.278**	**2**	**3.781**	**3.781**	**7.059**	**-**	**-**	**-**	**-**	**-**	**737**	**-**	**737**
2	Retail (total)	-	-	3.277	2	-	-	3.277	-	-	-	-	-	-	-	-
3	residential mortgage	-	-	2.645	1	-	-	2.645	-	-	-	-	-	-	-	-
4	credit card	-	-	632	-	-	-	632	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	0	0	3.781	3.781	3.782	-	-	-	-	-	737	-	737
8	loans to corporates	-	-	0	0	3.781	3.781	3.782	-	-	-	-	-	737	-	737
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 26b: EU-SEC1 - Securitisation exposures in the non-trading book as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
		Traditional				Synthetic		Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
		STS		Non-STS												
			of which SRT		of which SRT		of which SRT		STS	Non-STS			STS	Non-STS		
1	**Total exposures**	**-**	**-**	**4.385**	**1**	**4.660**	**4.660**	**9.045**	**-**	**-**	**-**	**-**	**-**	**786**	**-**	**786**
2	Retail (total)	-	-	4.384	0	-	-	4.384	-	-	-	-	-	11	-	11
3	residential mortgage	-	-	3.719	0	-	-	3.719	-	-	-	-	-	11	-	11
4	credit card	-	-	665	-	-	-	665	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	1	1	4.660	4.660	4.661	-	-	-	-	-	775	-	775
8	loans to corporates	-	-	1	1	4.660	4.660	4.661	-	-	-	-	-	775	-	775
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Templates EU-SEC3 and EU-SEC4 include information on securitisation exposures in the non- trading book only with significant risk transfer.

Template 27a: EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
1	**Total exposures**	**3.694**	**-**	**-**	**4**	**85**	**-**	**-**	**3.784**	**-**	**-**	**-**	**408**	**-**	**-**	**-**	**33**	**-**
2	Traditional transactions	-	-	-	2	-	-	-	2	-	-	-	22	-	-	-	2	-
3	Securitisation	-	-	-	2	-	-	-	2	-	-	-	22	-	-	-	2	-
4	Retail underlying	-	-	-	2	-	-	-	2	-	-	-	20	-	-	-	2	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	0	-	-	-	0	-	-	-	3	-	-	-	0	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	3.694	-	-	2	85	-	-	3.781	-	-	-	386	-	-	-	31	-
10	Securitisation	3.694	-	-	2	85	-	-	3.781	-	-	-	386	-	-	-	31	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	3.694	-	-	2	85	-	-	3.781	-	-	-	386	-	-	-	31	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 27b: EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
1	**Total exposures**	**4.569**	**-**	**-**	**4**	**88**	**-**	**-**	**4.661**	**-**	**-**	**-**	**489**	**-**	**-**	**-**	**39**	**-**
2	Traditional transactions	-	-	-	1	-	-	-	1	-	-	-	9	-	-	-	1	-
3	Securitisation	-	-	-	1	-	-	-	1	-	-	-	9	-	-	-	1	-
4	Retail underlying	-	-	-	0	-	-	-	0	-	-	-	5	-	-	-	0	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	1	-	-	-	1	-	-	-	4	-	-	-	0	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	4.569	-	-	3	88	-	-	4.660	-	-	-	481	-	-	-	38	-
10	Securitisation	4.569	-	-	3	88	-	-	4.660	-	-	-	481	-	-	-	38	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	4.569	-	-	3	88	-	-	4.660	-	-	-	481	-	-	-	38	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 28a: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions
1	**Total exposures**	**727**	**0,3**	**-**	**10**	**-**	**-**	**737**	**-**	**-**	**-**	**253**	**-**	**-**	**-**	**20**	**-**	**-**
2	Traditional securitisation	727	0,3	-	10	-	-	737	-	-	-	253	-	-	-	20	-	-
3	Securitisation	727	0,3	-	10	-	-	737	-	-	-	253	-	-	-	20	-	-
4	Retail underlying	-	0,3	-	10	-	-	10	-	-	-	108	-	-	-	9	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	727	-	-	-	-	-	727	-	-	-	145	-	-	-	12	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

ALPHA BANK

Template 28b: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions
1	**Total exposures**	**775**	**-**	**0**	**10**	**-**	**-**	**786**	**-**	**-**	**-**	**273**	**-**	**-**	**-**	**22**	**-**	**-**
2	Traditional securitisation	775	-	0	10	-	-	786	-	-	-	273	-	-	-	22	-	-
3	Securitisation	775	-	0	10	-	-	786	-	-	-	273	-	-	-	22	-	-
4	Retail underlying	-	-	0	10	-	-	11	-	-	-	118	-	-	-	9	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	775	-	-	-	-	-	775	-	-	-	155	-	-	-	12	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Templates EU-SEC5 reflect the exposures in default and credit risk adjustments made during the period.

Template 29a: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 30.06.2025

(Amounts in millions of Euro)

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
			Of which exposures in default	
1	**Total exposures**	**20.297**	**12.293**	**- 205**
2	Retail (total)	13.346	9.639	- 148
3	residential mortgage	12.148	9.175	- 147
4	credit card	632	3	- 1
5	other retail exposures	566	461	-
6	re-securitisation	-	-	-
7	Wholesale (total)	6.951	2.654	- 57
8	loans to corporates	6.951	2.654	- 57
9	commercial mortgage	-	-	-
10	lease and receivables	-	-	-
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

Template 29b: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 31.12.2024

(Amounts in millions of Euro)

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
			Of which exposures in default	
1	**Total exposures**	**21.801**	**11.429**	**841**
2	Retail (total)	13.670	8.633	897
3	residential mortgage	13.005	8.628	904
4	credit card	665	5	- 7
5	other retail exposures	-	-	-
6	re-securitisation	-	-	-
7	Wholesale (total)	8.131	2.796	- 56
8	loans to corporates	8.131	2.796	- 56
9	commercial mortgage	-	-	-
10	lease and receivables	-	-	-
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

8 Market Risk

Market Risk Management Framework

Market risk is the risk of reduction in economic value arising from unfavorable changes in the value or volatility of interest rates, foreign exchange rates, stock exchange indices, equities and commodities.

Market risk management is conducted in accordance with policies and procedures that have been developed and are implemented by all Group companies.

The Group Risk Management Committee is responsible for supporting and supervising the Market Risk management framework and ensuring the application of all the necessary measures to identify, estimate, monitor and control this type of risk. Group ALCO is responsible for approving Market Risk guidelines, strategy and market risk organizational structure. Group ALCO is also responsible for overseeing the Market Risk management strategy, policy and procedures, and ensuring the appropriate communication or forwarding of market risk management issues.

Market Risk is controlled through the establishment and implementation of a well-structured set of limits, according to the Group Market Risk Appetite while satisfying the relevant customer needs.

Alpha Bank calculates Value at Risk (VaR) for internal risk management purposes since 1999. In 2008, the Bank of Greece validated the Bank's internal model for VaR and approved its application for the calculation of capital requirements for general market risk on a solo level in accordance to the Bank of Greece Governor's Acts 2577/2006 and 2591/2007. From the end of 2011 and in accordance to the Bank of Greece Governor's Act 2646/093093.2011, the Bank became compliant with Basel 2.5 and Stressed VaR was estimated together with VaR for the calculation of capital. After the acquisition of Emporiki Bank in 2013, and following the approval of the Bank of Greece, Alpha Bank applied the internal model on a consolidated basis for the combined trading books for general market risk.

The VaR methodology applied is historical simulation, using a 99% percentile, one tailed confidence interval, a historical observation period of 2 years un-weighted data and a 1 and 10–day holding period. 10 day VaR is calculated with a 10 day horizon and a 1 day fixed step (overlapping periods). Calculation of the value-at-risk value is performed on a daily basis using full valuation across all risk factors and positions. Market and position data are updated on a daily basis. The model uses a mixed approach when applying variations in market rates and prices. For Interest rate and credit spread market risk factors absolute change is performed, while relative changes are used for FX, volatility and equity. The VaR methodology used is the same both for regulatory VaR and internal risk management VaR, with the only difference being that credit spread risk is not addressed for regulatory purposes.

8.1 IMA approach for market risk

For the purpose of the calculation of the own fund requirements for the general market risk according to Article 365 the Capital Requirements Regulation (CRR) ((EU) No 575/2013), institutions are expected to calculate at least weekly a “stressed value at risk” of the current Trading book. Historical data is used from a continuous 12-month period of financial stress relevant to the Bank’s portfolio. The Stressed Period is reviewed at least annually and the authorities are notified of any changes accordingly. The Stressed VaR methodology is based on the current VaR methodology. All risk factors included in the regulatory VaR model are considered in the Stressed VaR model. The Bank computes the Stressed VaR measure on a daily basis, to coincide with the VaR periodicity.

The stress period, after the recent review, -changed to 23/03/2022 -23/03/2023. The selection of the stress period is based on the assessment of the most volatile period in recent history.

The risk categories covered by Alpha Bank’s regulatory internal model are general risk of equity instruments, general risk of debt instruments, foreign exchange risk and commodities risk.

The own fund requirements under the IMA at 30.06.2025 are displayed in the following table:

Template 30a: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 30.06.2025

(Amounts in millions of Euro)

		a	b
		RWAs	**Own funds requirements**
1	**VaR** (higher of values a and b)	93	7
(a)	Previous day’s VaR (VaRt-1)		2
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		7
2	**SVaR** (higher of values a and b)	189	15
(a)	Latest available SVaR (SVaRt-1))		4
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		15
3	**IRC** (higher of values a and b)		
(a)	Most recent IRC measure		
(b)	12 weeks average IRC measure		
4	**Comprehensive risk measure** (higher of values a, b and c)		
(a)	Most recent risk measure of comprehensive risk measure		
(b)	12 weeks average of comprehensive risk measure		
(c)	Comprehensive risk measure Floor		
5	Other		
6	**Total**	**282**	**23**

Template 30b: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	**VaR** (higher of values a and b)	104	8
(a)	Previous day's VaR (VaRt-1)		2
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		8
2	**SVaR** (higher of values a and b)	170	14
(a)	Latest available SVaR (SVaRt-1))		2
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		14
3	**IRC** (higher of values a and b)		
(a)	Most recent IRC measure		
(b)	12 weeks average IRC measure		
4	**Comprehensive risk measure** (higher of values a, b and c)		
(a)	Most recent risk measure of comprehensive risk measure		
(b)	12 weeks average of comprehensive risk measure		
(c)	Comprehensive risk measure Floor		
5	Other		
6	**Total**	**274**	**22**

A flow statement explaining the variations in the market RWAs is displayed in the following table:

Template 31a: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
1	**RWAs at previous period end**	90	106	-	-	-	196	16
1a	*Regulatory adjustment* [(1)]	*67*	*82*	-	-	-	*148*	*12*
1b	*RWAs at the previous quarter-end (end of the day)*	*24*	*24*	-	-	-	*48*	*4*
2	Movement in risk levels	7	20	-	-	-	26	2
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	-0	-	-	-	-	-0	-0
8a	*RWAs at the end of the disclosure period (end of the day)*	30	44	-	-	-	74	6
8b	*Regulatory adjustment* [(1)]	63	145	-	-	-	208	17
8	**RWAs at the end of the disclosure period**	93	189	-	-	-	282	23

Template 31b: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
1	**RWAs at previous period end**	104	170	-	-	-	274	22
1a	*Regulatory adjustment* [(1)]	*82*	*144*	-	-	-	*226*	*18*
1b	*RWAs at the previous quarter-end (end of the day)*	*22*	*26*	-	-	-	*48*	*4*
2	Movement in risk levels	38	(2)	-	-	-	36	3
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	(36)	-	-	-	-	(36)	(3)
8a	*RWAs at the end of the disclosure period (end of the day)*	24	24	-	-	-	48	4
8b	*Regulatory adjustment* [(1)]	67	82	-	-	-	148	12
8	**RWAs at the end of the disclosure period**	90	106	-	-	-	196	16

[(1)] The regulatory adjustment takes into account the Bank's multiplier in terms of the Internal Model which is embedded in the calculation of the RWAs.

In order to investigate any extreme market situations, market risk stress tests are performed on the banking and trading book portfolios. Stress Tests are performed by creating scenarios ('what if' hypothesis) to estimate the losses that may occur on the positions from potential unfavorable substantial movements/shocks in the market and in order to identify potential concentration risk within the portfolios.

Stress Tests may be carried out at any time on any position; however, they are carried out on a regular basis at the end of every month on the banking and trading book portfolios as well as in the context of ICAAP and the results are reported to the Risk Management Committee and ALCO.

Typical stress scenarios consider the following changes in risk factors:

Interest rates:

+/-200bp (up/down) parallel movement

+50bp (0 to 1 year); +150bp (1 to 5 years); + 300bp (5-10 years); (up – steepening)

-0bp (0 to 1 year); -100bp (1 to 5 years); -200bp (5-10 years); (down – flattening)

FX rates:

+/- 30% against EUR (worst case - depending on the overall position of the portfolio)

Prices (e.g. equities and indices):

+/-30% (depending on the portfolio position)

Volatilities:

-/+ 50% (depending on the portfolio position)

VaR and SVaR values as estimated during 2024 for the Bank trading portfolio, including the FX position due to participations, are given in the following table:

Template 32a: EU MR3 - IMA values for trading portfolios as of 30.06.2025

(Amounts in millions of Euro)

		a
		30.06.2025
VaR (10 day 99%)		
1	Maximum value	6
2	Average value	2
3	Minimum value	1
4	Period end	2
SVaR (10 day 99%)		
5	Maximum value	9
6	Average value	4
7	Minimum value	1
8	Period end	4
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (99.9%)		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

Template 32b: EU MR3 - IMA values for trading portfolios as of 31.12.2024

(Amounts in millions of Euro)

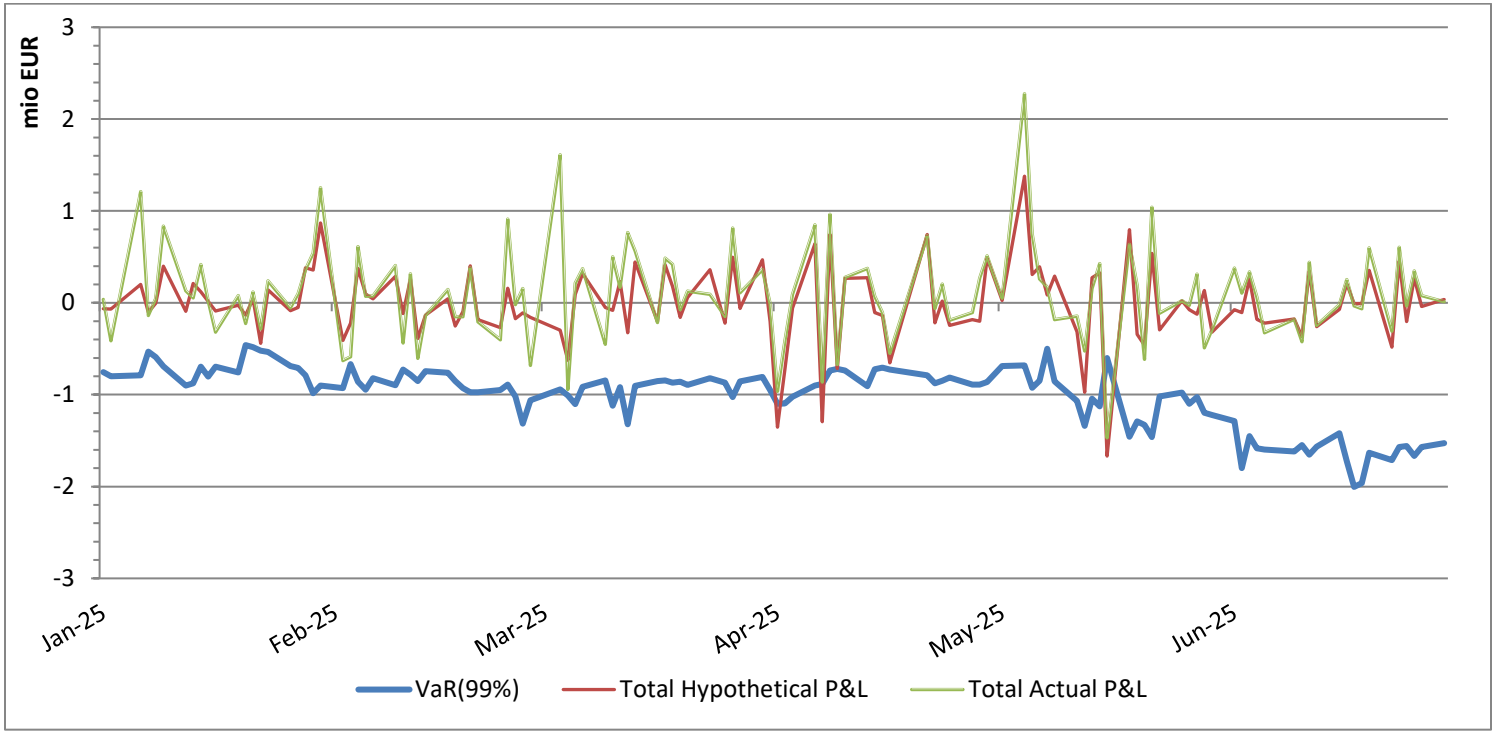
		a
		31.12.2024
VaR (10 day 99%)		
1	Maximum value	5
2	Average value	3
3	Minimum value	2
4	Period end	2
SVaR (10 day 99%)		
5	Maximum value	6
6	Average value	5
7	Minimum value	2
8	Period end	2
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (99.9%)		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

Additionally, VaR model validation (back testing) is performed on a daily basis. Both actual and hypothetical back testing is conducted in order to comply with the regulatory requirements. In terms of the hypothetical back testing process the daily VaR at a 99% confidence level is compared to the buy-and-hold profit and loss, i.e. the profit and loss impact if the trading portfolio is held constant at the end of the day and re-priced the following day considering the daily change in the underlying risk factors, excluding realized trading revenue, net interest, fees and commissions. Moreover, actual back testing is performed by comparing the daily VaR at 99% confidence interval with the actual daily profit/loss of the Bank's trading portfolio excluding net interest, fees and commissions. In both tests, based on a 99% confidence level of the VaR model, the losses would be expected to exceed the VaR of the portfolio two to three days in any one year. Periods of unstable market conditions could increase the number of back testing exceptions.

A comparison between the results of estimates from the regulatory VaR model with both hypothetical and actual trading outcomes is presented in the following graph:

Template 33: EU MR4 - Comparison of VaR estimates with gains/losses

(Amounts in millions of Euro)



Alpha Bank Group is in compliance with Bank of Greece requirements regarding the systems and controls through which the requirement for the provision of accurate and reliable valuation results is satisfied with, as described in Appendix VII of Directive 2591/20.8.2007.

During the first semester of 2025 -three overshootings were observed on Backtesting.

8.2 Standardized approach for market risk

Capital charges for specific risk on a solo basis are calculated with the Standardized approach. Alpha Bank Group uses also the Standardized approach for the measurement of market risk exposure and capital requirements for all its subsidiaries.

The following table summarizes the capital requirements for market risk per risk factor based on Standardized approach:

Template 34a: EU MR1 - Market risk under the standardised approach as of 30.06.2025

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	1
2	Equity risk (general and specific)	73
3	Foreign exchange risk	90
4	Commodity risk	6
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**169**

Template 34b: EU MR1 - Market risk under the standardised approach as of 31.12.2024

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	1
2	Equity risk (general and specific)	47
3	Foreign exchange risk	7
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**54**

9 Interest Rate and Credit Spread Risk in the Banking Book

9.1 Definition

IRRBB refers to the current or prospective risk to the Bank's capital and earnings arising from adverse movements in interest rates that affect the Bank's book positions. When interest rates change, the present value and timing of future cash flows change. This in turn changes the underlying value of the Bank's assets, liabilities and off-balance sheet items and hence its economic value of equity (EVE). Changes in interest rates also affect the Bank's earnings by altering interest rate – sensitive income and expenses, affecting its net interest income (NII).

The main components of IRRBB are the following:

- **Gap risk** arises from the term structure of banking book instruments and describes the risk arising from the timing of instruments' rate changes. Since rate may reset on different instruments at different tenors, the risk to the bank arises when the rate of interest paid on liabilities increases before the rate of interest received on assets or reduces on assets before interest rate paid on liabilities. Unless hedged, in terms of tenor and amount, the bank may be exposed to a period of reduced or negative interest margins or may experience changes in the relative economic values of assets and liabilities. The extent of gap risk also depends on whether changes to the term structure of interest rates occur consistently across the yield curve (parallel risk) or irregularly by period (non-parallel risk)
- **Basis risk** describes the impact of relative changes in interest rates for financial instruments that have similar tenors but are priced using different interest rates indices (bases) . Basis risk arises from the imperfect correlation in the adjustment of the rates earned and paid on different instruments with otherwise similar rate change characteristics.
- **Option risk** arises from option derivative positions or from optional elements embedded in the Bank's assets, liabilities and/or off-balance sheet items, where the Bank or the customer can alter the level and timing of the cash flows. Option risk can be further be characterized into automatic option risk and behavioral option risk:
    - **Automatic option risk** arising from over-the-counter option contracts or explicitly embedded within the contractual terms of a financial instruments (i.e. capped rate loan) and where the holder will almost exercise the option if it is in their interest to do so,
    - **Behavioral option risk** arising from flexibility embedded implicitly or within the terms of financial contracts, such that changes in interest rates may affect a change in the behavior of the client (i.e. rights of a borrower to prepay a loan, with or without a penalty, or the right of a depositor to withdraw their balance in search of higher yield).

Credit spread risk in the Banking Book (CSRBB) refers to the risk driven by changes of the market price for credit risk, for liquidity and for potentially other characteristics of credit-risky instruments, which are not captured by another existing prudential framework such as IRRBB or by expected credit/(jump-to-) default risk. CSRBB captures the risk of an instrument's changing spread while assuming the same level of creditworthiness, i.e. how the credit spread is moving within a certain rating/PD range.

The Bank recognizes CSRBB as a significant risk and conducts a comprehensive assessment of CSRBB within its risk management and internal capital assessment processes, focusing on the following CSRBB components:

- Market Credit Spread Changes: This aspect covers potential fluctuations in the market credit spread, representing the credit risk premium required by market participants for a given credit quality, distinct from the idiosyncratic credit spread33.
- Market Liquidity Spread Changes: This element addresses potential fluctuations in the market liquidity spread, representing the liquidity premium that influences the market appetite for investments and the presence of willing buyers and sellers.

9.2 Interest Rate Risk Framework

Alpha Group aims to maximize its profitability in line with its risk appetite and business objectives. Therefore, it recognizes the need to provide a sound framework for the identification, estimation, monitoring, controlling and reporting of interest rate and foreign exchange risks in the Banking Book, in a consistent manner across the Group. In 2016, Alpha Bank was self-assessed as Level 3 bank in the classification set out by EBA on Interest Rate Risk in the Banking Book (IRRBB). Furthermore, currently Alpha Bank is in Category 1 under the SREP Guidelines in terms of level of sophistication in risk measures.

For interest rate risk assessment and monitoring the following estimation techniques in line with EBA guidelines are used:

- Static Gap analysis for each currency.
- Scenario analysis for each currency.

When performing Interest Rate Static Gap Analysis, Group assets and liabilities are allocated into time buckets according to their repricing date for variable interest rate instruments, or according to their maturity date for fixed rate instruments Assets or Liabilities with no specific re-pricing schedule (such as revolving loans or savings and sight deposits), are allocated into time buckets according to a specific statistical model, as well as qualitative and quantitative business analysis.

9.3 Interest Rate Risk Statement

Market Risk Control and ALM Division are responsible for interest rate risk measurement. The main measure of Interest Rate risk is Interest Rate Risk Gap for each currency which represents the repricing schedule showing assets and liabilities by time band according to their maturity (for fixed rate instruments), or next reprice date (for adjustable/floating rate instruments).

The measures that the institution uses to gauge its sensitivity to IRRBB are calculated monthly. Specifically:

- Changes in expected earnings (ΔNII):

The earnings-based measure used for IRRBB purposes is the change in Net Interest Income (ΔNII), which is defined as the maximum reduction in NII plus market value changes of instruments under the regulatory & internal interest rate shocks used for IRRBB measurement purposes over a period of 1-year versus the base scenario.

- Changes in economic value of equity (ΔEVE).

The economic value-based measure used for IRRBB purposes is the change in Economic Value of Equity (ΔEVE), which is defined as the maximum decrease of the banking book's economic value under the regulatory & internal interest rate shocks used for IRRBB measurement purposes versus the base scenario. The change in economic value of equity (ΔEVE) is defined as the change in fair value of assets caused by a change in interest rates, minus the change in fair Value of liabilities caused by the same change in interest rates.

- DV01 by time tenor

The DV01 specifies the sensitivity by time bucket of the banking book portfolio if the interest rate changes by 1 basis point (0.01%)

Interest Rate Risk Stress Scenarios

The stress tests which are performed by Market Risk Control on a monthly basis cover both regulatory requirements and internal needs. The stress scenarios imply the parallel movement, the steepening as well as the flattening of the yield curve by either changing the short-term rates or the long-term rates or both. These scenarios are applied to IRRBB exposures in each currency for which the bank has material positions. Specifically, Market Risk Control performs six regulatory interest rate shocks for IRRBB measurement purposes according to EBA Guidelines (EBA/GL/2022/14):

- Parallel shock up (+200bps)
- Parallel shock down (-200bps)
- Steepener shock (short rates down and long rates up)
- Flattener shock (short rates up and long rates down)
- Short rates shock up
- Short rates shock down

Furthermore, Market Risk Control implements additional parallel and non-parallel interest rate shocks for internal purposes:

ALCo is responsible for approving and reviewing stress test scenarios for their appropriateness on an annual basis. Market Risk Control is in charge of calculating the impact of the stress scenarios on forecasted earnings as well as on economic value by incorporating assumptions relating to Alpha Group's business developments, customer behavior and future market developments.

9.4 Interest Rate Risk Monitoring

Alpha Bank has adopted an adequate, timely and accurate information system in order to monitor and report risk in line with its policies and regulatory requirements.

Group ALM and countries' local Treasuries are responsible for managing Alpha Group's positions in compliance with any established limits and escalating any significant issues with respect to the Group's interest rate and foreign exchange positions to Group ALCO and local ALCOs respectively. In addition, Market Risk Control provides support and input to Group ALCO, regarding Alpha Group's balance sheet management issues.

Market Risk Control consolidate the information received from countries' local Risk Management Units and communicate a summary report to Group ALCO.

According to BIS standards concerning interest rate limits on banking book, Alpha Bank implements limits on consolidated basis in terms of both economic value and earnings.

9.5 Interest Rate Risk management and mitigation strategies

The Bank is managing its IRRBB holistically taking into account short, medium and long-term considerations like macro and micro economic environment, forward looking balance sheet dynamics, capital, liquidity and regulatory requirements. Regarding hedging strategy, natural hedging within assets and liabilities are complemented with derivatives to achieve the optimal IRRBB structure given the Bank's Balance Sheet. Fair value and cash flow hedging strategies can be used with the aim to maintain an accounting geography symmetry. At times, economic hedges can also be deployed to optimally manage the Bank's IRRBB. All the above-mentioned hedging strategies are incorporated in Bank's Interest Rate Gaps and other relevant IRRBB reports in order to monitor their impact on the management of the IRRBB.

Assets Liabilities Committee (ALCo), in the framework of its responsibilities, discusses, acknowledges and approves the strategies and the relevant proposed actions for the management and hedging of Financial Risks of the Bank, including Interest Rate Risk in the Banking Book (IRRBB).

The ALCo presentation incorporates an in-depth analysis of IRRBB, inclusive of monitoring tools and metrics. Calculated outcomes related to the Bank's EVE and NII under several stress scenarios in relation to specific limits, Interest Rate Gaps, hedging actions and current IRRBB profile of the Bank's balance sheet are presented on a monthly basis to ALCo members.

The Committee meets once a fortnight or extraordinarily upon request, closely monitoring market conditions and developments.

9.6 Interest Rate Risk Key modelling and parametric assumptions

The Bank develops behavioral models for Non Contractual Assets and Liabilities taking into consideration Post Model Adjustments. The models are subject to validation by the independent validation unit of the Bank and are submitted for approval by ALCo. More specifically regarding Non-Maturity Deposits (NMDs), the Bank performs time series analysis to determine the behavioral/repricing of the NMDs under business-as-usual assumptions. As a first step the Bank via its models distinguishes the stable and non-stable part of NMDs and estimates an amortization tenor. In a second step the stable subset of NMDs is further broken into a core and non-core component. To achieve this the Bank via its interest rate model estimates the rate sensitive part (i.e. pass through rate) distinguishing the core and non-core part of the stable subset.

The magnitude of the optionality risk (loan prepayments and fixed term deposits early withdrawals) is considered immaterial for the Bank.. Moreover, the duration of time deposits which is approximately 0,6y and as well as the penalty are the main drivers of the immaterial impact of early withdrawals.

The Bank's product mix does not include material exposures in financial products with embedded optionality, apart from the embedded floors on loan products.

9.7 Significance of the IRRBB measures and significant variations since previous disclosures

Changes of interest rates lead to changes in the present value (PV) and timing of future cash flows. The changes in PV and the timing of future cash flows lead to changes in the underlying value of the Bank's assets, liabilities and off-balance sheet items and hence its economic value. Changes in interest rates affect the Bank's earnings by altering interest rate-sensitive income and expenses, affecting the Bank's Net Interest Income (NII). Excessive exposure to IRRBB can pose a significant threat to the Bank's current capital base and/or future earnings, if not managed appropriately.

Furthermore, IRRBB remained within risk appetite framework limits. This also includes subsidiary level limits.

Template 35a: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d
Supervisory shock scenarios		**Changes of the economic value of**		**Changes of the net interest income**	
		Current period	**Last period**	**Current period**	**Last period**
1	Parallel up	(534)	(462)	(122)	(134)
2	Parallel down	457	377	(150)	(123)
3	Steepener	(71)	(43)		
4	Flattener	(14)	(76)		
5	Short rates up	(179)	(211)		
6	Short rates down	124	59		

Template 35b: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d
Supervisory shock scenarios		**Changes of the economic value of**		**Changes of the net interest income**	
		Current period	**Last period**	**Current period**	**Last period**
1	Parallel up	(462)	(533)	(134)	(160)
2	Parallel down	377	291	(123)	(184)
3	Steepener	(43)	(63)		
4	Flattener	(76)	(124)		
5	Short rates up	(211)	(282)		
6	Short rates down	59	56		

10 Liquidity Risk

10.1 Liquidity risk management strategies and processes

Alpha Bank's liquidity risk management principles are documented in the "Liquidity Risk Policy" which provides a reference document to guide the Bank's Units when implementing actions for liquidity risk management, measurement, and control. The individual roles and responsibilities within the Liquidity Risk Management Framework Governance have been laid out in ILAAP, designed to provide clarity and transparency across all involved stakeholders. Furthermore, ILAAP allows for liquidity planning taking into consideration the Group's risk appetite (RAF) and Business Plan. The ILAAP constitutes one of the pillars supporting the Group in the implementation of its overall business strategy and continuous operation under normal and adverse economic conditions. It aims to ensure that sufficient levels of liquidity are maintained on an ongoing basis by identifying the key liquidity and funding risks to which the Bank is exposed, by monitoring and measuring these risks, and by maintaining tools and resources to manage and mitigate these risks.

Furthermore, the Bank through its Funds Transfer Pricing methodology (FTP Policy Manual) allocates among Business Units the financial result associated with raising or using liquidity and applies a commercial policy on the sources of funding.

10.2 Liquidity risk management structure and organization

The Board of Directors (BOD) approves the liquidity risk strategy for the Bank through the ILAAP process and the Risk Capital Strategy (RCS) monitors the quantitative and qualitative aspects of liquidity risk, based on recommendations made by the Asset and Liability Committee (ALCO) and Risk Management Committee (RMC).

The liquidity managing functions are organized in alignment with the three lines of defense structure". Asset Liability Management Division (ALM) and Treasury Division comprise the first line of defense responsible for executing the steps needed to manage the Bank's liquidity position and liquidity strategy.

The second line of defense consists of the risk management function and other relevant functions, independent from the first line of defense. They are responsible for measuring, monitoring, controlling and reporting the bank's risk-taking activities related to liquidity risk.

10.3 Centralized group liquidity management and individual legal entity Liquidity management

Alpha Bank ensures at the level of the parent bank and of each subsidiary that all liquidity metrics are managed in compliance with the defined risk appetite and comply with the liquidity thresholds set by the regulators. Foreign subsidiaries address their liquidity needs in their local currencies by accessing local Central Bank facilities or interbank market. Nevertheless, the parent company remains the main liquidity provider in cases of liquidity restrain, while a frequent monitoring of the subsidiaries' liquidity position is applicable through relevant suitable reporting and communication, both on a regular and ad hoc basis.

10.4 Scope and nature of liquidity risk measurement and reporting system

The Bank's liquidity risk measurement systems support regulatory reporting, as well as internal liquidity risk management reporting for discussion or decision-making purposes. In particular, the provision of risk information to senior management enables the relevant governing bodies to monitor, steer and control the Bank's liquidity risk-taking activities effectively. The risk infrastructure also incorporates the material legal entities and provides the basis for reporting on liquidity risk positions and limit utilization to the relevant functions on a regular and ad-hoc basis.

10.5 Liquidity stress testing and scenario analysis

The Bank performs stress testing to estimate losses that could result from short term extreme, yet plausible, stress events, to identify, better understand and manage its potential vulnerabilities and risk concentrations. The short stress scenarios that are conducted, are idiosyncratic, systemic and combined, encompassing both bank-specific and market-wide stress events that are calibrated to different levels of severity. The stress testing has a key role in the Bank's risk appetite, limits' framework and business planning processes. In particular, through the scenario analysis the Bank monitors the nature and amount of embedded liquidity risk exposure and limits liquidity risk to acceptable levels, thus supporting a number of decision-making processes. Model validation Division performs the independent validation of liquidity risk models estimates.

Furthermore, a long-term Stress Test is performed under 3 macroeconomic systemic scenarios of varying severity (the assumptions of the scenarios concern the macroeconomic environment, as well as the evolution of key business and risk metrics) over a 3-year horizon. These scenarios are conducted annually in line with Business Plan and the forward-looking assessment performed under the normative perspective of ILAAP/ICAAP. The key role of long-term stress testing is to ensure that sufficient levels of liquidity are maintained on an ongoing basis by identifying the key liquidity and funding risks to which the Group is exposed, by monitoring and measuring these risks, and by maintaining tools and resources to manage and mitigate these risks.

10.6 An outline of the bank's contingency funding plans

The Contingency Funding Plan (CFP) is a dedicated document of the Bank, aiming to ensure confidence and continuation of the Bank's operations, including the following aspects for appropriately addressing liquidity shortfalls in emergency situations:

- Establishment of clear lines of responsibility, including clear escalation procedures. It has pre-defined escalation levels aimed at maximizing the likelihood that the Bank is able to take certain measures to address liquidity or funding shortfalls
- Set up of key liquidity indicators and triggers
- Identification of market-wide and bank-specific liquidity threats and risk factors, assessment of alternative funding sources and contingency procedures

10.7 Legal, regulatory and operational limitations on the transferability of liquidity between individual legal entities, foreign branches and subsidiaries

Risk measures are prepared at the level of individual entities/branches. The Bank takes into account legal and regulatory issues that may affect the transferability of liquidity between individual entities (including the timing of availability of liquidity/release of funding lines).

10.8 Liquidity Coverage Ratio (LCR)

Definition

The LCR refers to the proportion of the high-quality liquid assets held by financial institutions, to ensure their ability to meet their short-term net cash flows, over a 30-day stress period. The LCR became mandatory on 1 October 2015. The regulatory limit established is 100%.

The Bank monitors and reports the LCR on an individual and on consolidated basis. The LCR disclosures of the Pillar III report refer to the consolidated figures.

As of June 2025 the HQLA buffer stood at EUR 16.3 billion and the Group LCR stood at 194.0%.

The following table provides a breakdown of the LCR as of 30 June 2025, in accordance with Article 435 of the Regulation (EU) No 575/2013 and the respective guidelines on LCR disclosure (EBA/GL/2017/01).

The figures are calculated as simple averages of end-of-month observations of the Group LCR.

Template 36: EU LIQ1 - Quantitative information of LCR as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (DD Month YYY)	30.06.2025	31.03.2025	31.12.2024	30.09.2024	30.06.2025	31.03.2025	31.12.2024	30.09.2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	**Total high-quality liquid assets (HQLA)**					**16.156**	**16.031**	**15.782**	**15.719**
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	37.811	38.105	38.369	38.498	2.308	2.293	2.259	2.249
3	*Stable deposits*	19.704	19.898	19.996	20.084	985	995	1.000	1.004
4	*Less stable deposits*	10.893	10.754	10.528	10.451	1.323	1.297	1.259	1.244
5	Unsecured wholesale funding	11.257	11.433	11.710	11.957	5.291	5.390	5.501	5.571
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	309	303	280	288	77	76	70	72
7	*Non-operational deposits (all counterparties)*	10.929	11.095	11.406	11.644	5.196	5.279	5.407	5.475
8	*Unsecured debt*	19	36	24	25	19	36	24	25
9	*Secured wholesale funding*					177	128	107	104
10	Additional requirements	1.306	1.318	1.323	1.359	589	600	599	593

11	*Outflows related to derivative exposures and other collateral requirements*	509	521	521	512	509	521	521	512
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	797	797	802	848	80	79	78	82
14	Other contractual funding obligations	290	295	311	317	290	295	311	317
15	Other contingent funding obligations	10.137	10.037	10.016	9.905	668	651	647	673
16	**TOTAL CASH OUTFLOWS**					**9.323**	**9.357**	**9.424**	**9.507**
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	113	149	149	150	1	8	8	15
18	Inflows from fully performing exposures	1.543	1.574	1.680	1.699	892	985	1.101	1.136
19	Other cash inflows	155	154	157	151	51	50	49	43
20	**TOTAL CASH INFLOWS**	**1.811**	**1.877**	**1.985**	**2.001**	**944**	**1.043**	**1.158**	**1.194**
EU-20c	*Inflows subject to 75% cap*	1.755	1.805	1.918	1.940	944	1.043	1.158	1.194
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					16.156	16.031	15.782	15.719
22	**TOTAL NET CASH OUTFLOWS**					**8.379**	**8.315**	**8.266**	**8.313**
23	LIQUIDITY COVERAGE RATIO					193%	193%	191%	189%

10.9 Net Stable Funding Ratio

The NSFR ratio relates the Bank's available stable funding to its required stable funding and it should be equal to at least 100%. The ratio is calculated in accordance with the Regulation (EU) 2019/876 of the European Parliament and of the Council and a limit of 100% became binding in June 2021.

Template 37a: EU LIQ2: Net Stable Funding Ratio as of 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				**Weighted value**
		No maturity	**< 6 months**	**6 months to < 1yr**	**≥ 1yr**	
Available stable funding (ASF) Items						
1	Capital items and instruments	**8.530**	**24**	**1**	**992**	**9.522**
2	*Own funds*	8.530	24	1	992	9.522
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		35.637	2.096	**3**	**35.115**
5	*Stable deposits*		22.081	955	2	21.886
6	*Less stable deposits*		13.557	1.141	2	13.229
7	Wholesale funding:		**19.543**	**592**	**2.377**	**8.544**
8	*Operational deposits*		303	-	-	152
9	*Other wholesale funding*		19.240	592	2.377	8.393
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**33**	**1.226**	**-**	**19**	**19**
12	*NSFR derivative liabilities*	33				
13	*All other liabilities and capital instruments not included in the above categories*		1.226	-	19	19
14	**Total available stable funding (ASF)**					**53.200**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**370**

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		**4.353**	**2.748**	**35.251**	**32.161**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		209	1	392	414
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.999	2.418	22.188	25.201
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		235	227	2.153	4.722
22	*Performing residential mortgages, of which:*		106	139	5.129	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		106	110	4.591	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		39	190	7.543	6.546
25	Interdependent assets		-	-	-	-
26	Other assets:		**1.269**	**60**	**9.835**	**9.986**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	279	237
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		614			31
31	*All other assets not included in the above categories*		656	60	9.556	9.718
32	Off-balance sheet items		**609**	**1.255**	**4.721**	**748**
33	**Total RSF**					**43.265**
34	**Net Stable Funding Ratio (%)**					**123%**

Template 37b: EU LIQ2: Net Stable Funding Ratio as of 31.03.2025

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**8.292**	**39**	**-**	**989**	**9.281**
2	*Own funds*	8.292	39	-	989	9.281
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**35.419**	**1.883**	**4**	**34.720**
5	*Stable deposits*		21.974	900	1	21.732
6	*Less stable deposits*		13.445	983	3	12.988
7	Wholesale funding:		**19.780**	**864**	**2.279**	**8.205**
8	*Operational deposits*		313	-	-	157
9	*Other wholesale funding*		19.467	864	2.279	8.048
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**413**	**1.205**	**-**	**18**	**18**
12	*NSFR derivative liabilities*	413				
13	*All other liabilities and capital instruments not included in the above categories*		1.205	-	18	18
14	**Total available stable funding (ASF)**					**52.224**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**366**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**4.889**	**2.487**	**34.017**	**31.157**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		215	1	293	315
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		4.425	2.174	21.449	24.622
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		227	205	2.055	4.951
22	*Performing residential mortgages, of which:*		111	140	5.161	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		111	117	5.055	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		138	172	7.114	6.220
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**1.662**	**44**	**9.122**	**9.679**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	258	220
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		697			35
31	*All other assets not included in the above categories*		965	44	8.863	9.424
32	Off-balance sheet items		**506**	**1.208**	**4.747**	**742**
33	**Total RSF**					**41.944**
34	**Net Stable Funding Ratio (%)**					**125%**

11 Environmental, Social and Governance (ESG) Risks

11.1 ESG Strategy and Governance

11.1.1 Environmental Risk

Business Strategy and Processes

Alpha Bank, assesses regularly and prioritizes the environmental and climate issues which are related to its activities and might impact the Group's operations and/or its Stakeholders. The Double Materiality Analysis performed has enabled the identification of the actual and potential, positive or negative impacts on people and nature with regards to the Group's own operations, upstream (suppliers) as well as downstream (business) activities. Sustainability risks and opportunities were assessed based on the magnitude of financial effects for the current financial effects and the likelihood of occurrence and the potential magnitude of their financial effects in the short- (2025), medium- (2026-2030) and long-term (>2030) horizons.

Following the recommendations of the European Sustainability Reporting Standards (ESRS) and the Task Force on Climate-related Financial Disclosures (TCFD), the Bank assesses current and impending environmental policies, legal requirements and regulatory guidelines relating to climate and the environment, including the recording and the efficient management of any transitional risks, related to its activities. In this context, the Group has developed a comprehensive approach to integrate climate and environmental risk management across its business activities. Leveraging on work performed in this context, during 2021-2023, the Bank developed a cohesive Group's ESG strategy including concrete commitments. As part of these commitments, in 2024 the Group began to develop Science Based Targets for the Decarbonization of its portfolio. Alpha Bank is continuously monitoring the emerging business and regulatory requirements, further enhancing its policies and procedures, where deemed necessary.

Further information on business strategy, policies, and processes, as well as ESG Commitments and targets are presented in the Sustainability Statement within the Annual Report 2024, which is publicly available on the website. The TCFD and Sustainability Reports are also available on the website of Alpha Bank

Strategic Plan and Double Materiality Assessment

Alpha Bank has deployed a comprehensive strategic plan, and in this context has taken the following actions:

a) Identified, assessed, and prioritized the ESG issues related to its activities that may impact the Group's operations and/or its Stakeholders. This was achieved through a materiality analysis process, in line with the European Sustainability Reporting Standards for materiality analysis by utilizing the UNEPFI PRB Tool for Banks to understand the positive and negative, environmental, and social impacts, risks and opportunities of its portfolio.

b) Introduced environmental, social and governance KPIs (such as % of disbursements to RES over total disbursements to Energy sector, ii) gross disbursements aligned with Sustainable Finance Framework, iii) Green asset ratio, etc.), which are monitored on a quarterly and annual basis to take corrective action when needed.

c) Committed to achieve net zero greenhouse gas emissions by 2050, in alignment with the Net Zero Banking Alliance (NZBA) guidelines and the objectives of the Paris Agreement. The Bank has committed to support the transition to a net-zero economy and set interim financed emissions' reduction targets for 2030 on four sectors: Power Generation, Oil & Gas, Iron & Steel, and Cement. The process for target setting takes into consideration the clients' decarbonization plans.

d) Aligned the decarbonization targets with its 3-year Business Plan and annual budgets, via rules incorporated into its Risk Appetite Framework.

For the reporting year, the Group performed a double materiality assessment to identify its material impacts, risks and opportunities as per the Corporate Sustainability Reporting Directive (CSRD). The assessment was implemented in consultation with internal and external stakeholders, by taking into consideration the Group's business operations, its value chain, and international best practices. The methodology followed is presented in detail in the Sustainability Statement Section of the Annual Report 2024, which is available on the Alpha Bank Group website.

The **impact materiality** was performed by leveraging supplier data (i.e. sectors of suppliers and associated spending) for **upstream activities**, and portfolio data [i.e., associated financial metrics related to the products/services provided to Customers (corporate or individuals)] for **downstream activities**, respectively.

- UNEP FI resources were utilized for both upstream and downstream impact identification and assessment to provide sectoral impacts.
- The impact materiality for **own operations** has been performed by leveraging material topics as resulted from the 2023 materiality, in combination with reviews of peers and ESG standards (GRI, SASB).

The **financial materiality** for risks was performed by leveraging existing ESG Risk Materiality methodologies followed by Alpha Bank. The UNEP FI Tool was utilized on Alpha Bank's portfolio data for the materiality assessment of nature-related risks.

- The Risk and Control Self-Assessments (RCSA) for the inherent risk assessment, as well the outcome from Compliance Risk Assessments served as a basis for the Financial Materiality Assessment for social and governance risk.
- Appropriate thresholds on inherent risk basis were introduced to arrive at materiality results and conclusions.

The prioritization and final list of material impacts, risks and opportunities were presented and debated within the dedicated Steering Committee which acted as the first control frontier with the participation of Directors of the key business areas, including Governance and Sustainability, Climate and ESG Risk, Internal Audit, Legal, Accounting, Group Data Protection, Human Resources. The Group Sustainability Committee functioned as the second level approval, followed by the Group Sustainability Committee, the Corporate Governance Sustainability, and Nominations Committee and the Audit Committee.

The materiality analysis results in the context of the environment, whether positive or negative are the following:

- Material negative impact to **climate stability**, across the value chain, though GHG emissions created indirectly by the Group's products/services and business relationships, energy consumption in own operations, and associated transition risks and opportunities for the Group.

- **Climate physical risks and adaptation** opportunities, through Group's products/services and business relationships with Customers.
- Material negative impact to **Habitats (which affects the status of Biodiversity and Ecosystems)**, created indirectly though the Group's products/services and business relationships, and associated transition risks and opportunities for the Group.
- Material negative impact to **Resource Security (which affects the development of a Circular Economy)**, though the Group's products/services and business relationships and transition opportunities for the Group.

Based on this analysis, the Bank is deploying a comprehensive strategic plan to support an environmentally sustainable economy and mitigate climate change. The Bank's actions focus on the increase in Sustainable Financings and the gradual reduction of financings that may have a negative impact on the environment. The Bank applies the **PCAF methodology**, to measure financed emissions per asset class (i.e. listed equity and corporate bonds, business loans and unlisted equity, project finance, commercial real estate, mortgages, motor vehicle loans, sovereign debt), to enable the identification of climate-related transition risks and opportunities, setting and implementing climate targets and financing transitions in different sectors of the economy.

The Group progressed with the identification of its most significant impact areas/topics which are associated with the portfolio of its subsidiary company in Cyprus. The impact analysis has been performed utilizing the UNEP FI impact analysis tool. Results of the analysis will inform the subsidiary's sustainability strategy and support the alignment with the Group's sustainability strategy.

Moreover,, the Group has developed policies and procedures to reduce the operational environmental footprint and to strengthen its commitments associated with this objective.

The **Bank's Strategic Plan** incorporates the following commitments to support an environmentally sustainable economy:

- Support Bank's customers' decarbonization
- Align portfolio emissions to meet the Paris Agreement objectives
- Mitigate key drivers of biodiversity loss
- Support the transition to a circular economy
- Achieve Net Zero emissions in own operations

The relevant targets to meet the Bank's environmental and climate commitments in its financing activities are described below:

Support an environmentally sustainable economy			
Commitments	**Targets**	**Target Date**	**KPIs**
Support our Customers' decarbonization and align Bank's portfolio emissions with the objectives set in the Paris Agreement	Allocate Euro 4.4 billion to new Sustainable Financings increasing target by Euro 1.4 billion compared to 2023 - 2025 target announcement	2026	New financing volumes (in Euro million)
	Within the total Sustainable Financings, achieve at least Euro 2.6 billion to Renewable Energy Systems by 2026, increasing target by Euro 1.6 billion compared to 2023- 2025 target announcement	2026	New financing volumes (in Euro million)
	Within the total Sustainable Financings, achieve at least Euro 300 million of Retail Sustainable (Green & Social) loans, including loans to small businesses	2026	New financing volumes (in Euro million)
	Launch new sustainability-based Mortgage, Credit Cards & Consumer Loan products	2025	No. of Products Launched
	Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation	Ongoing	New financing volumes (in Euro million)
Mitigate key drivers of biodiversity loss	Zero financing to targeted activities harming species diversity, habitats and waterbodies	Ongoing	New financing volumes (in Euro million)
Support the transition to a circular economy	Reduction of annual paper usage rate by 50% (base year 2019)	2025	Tones of paper used (including copying paper, statements, bank forms, etc.)
Achieve Net Zero emissions in our own operation	Reduction of Scope 1 and 2 GHG emissions by 20% (base year 2022)	2025	Scope 1 and 2 emissions (tCO2e)
	Upgrade lighting to LED lighting throughout the network	2028	Number of Branches with upgraded LED lighting
	Continue to procure 100% renewable electricity for all Bank's buildings and branches	On going	Percentage of electrical power used that is derived from non-renewable energy sources *(Alpha Bank)*
	Replacement of 70 % of the Bank's fleet with electric and/or plug-in vehicles (base year 2022)	2025	Number of vehicles replaced with electric and/or plug-in ones.

Certified Management Systems (ISO)

Regarding in-house impacts across Bank's operations and its supply chain certain business areas and subsidiaries of the Group also applies, among other measures, internal management systems certified with ISO (14001, 14064, 45001, 22301, 22316, 27001, 27017, 27018, 27701, 9001, 20000-1, 20400, 50001)[2].

Additionally, through its Environmental Management System, the Bank aims to reduce its environmental and carbon footprint by promoting the rational use of lighting, heating and cooling installations in its buildings, the use of environment-friendly class A++ or higher energy efficiency equipment, by implementing initiatives for the efficient use of raw and other materials and by applying the "reduce, reuse, recycle" principles of circular economy in the waste management. Indicatively, the Bank recycles paper, batteries, light bulbs, printer consumables, electric and electronic equipment, and donates old office equipment.

For monitoring and reporting its GHG emissions the bank implements procedures certified with the ISO14064 standard, verified by TÜV AUSTRIA.

The certified management systems (ISO) implemented by the Group aim to enable it to better respond to the ever-changing business environment and to the needs of Customers, in full alignment with current legislative and regulatory requirements. Since 2021 Alpha Bank submits to the Greek Ministry of Environment and Energy an annual voluntary statement based on the EU EMAS guidelines for all our central operations and Bank branches. Alpha Bank's most recent registration to the European eco-management and audit scheme (EMAS) was on 05/11/2024 by decision of the Ministry. The Statement referred to 2023 data.

The Bank has also established a holistic ESG training program, as well as organizes, supports, and participates in environmental actions to cultivate the environmental awareness of its Employees and their families.

As part of its broader ESG strategy, Alpha Bank has recognized the EU Taxonomy (EU Regulation 2020/852), as the central pillar of its institutional framework on climate change, environmental protection, and equitable development for all. The company has adopted a holistic approach to its ESG strategy, aiming to support its customers in their transition to sustainability, and ensure the long-term value proposition of its investors.

Through the structured collection, management, and application of relevant sustainability data, for each customer's loans and investments, the Bank assesses the quality of its assets. Moreover, the sustainability data constitute the basis for target setting and prioritization of actions to improve the Group's sustainability KPIs, in line with the evolving requirements of investors, regulators, markets and society.

[2] ISO 14001 (Environmental Management System), ISO 14064 (Greenhouse Gas Emissions Management System), ISO 45001 (Occupational health and safety), ISO 22301 (Business Continuity Management System), ISO22316 (Organizational resilience), ISO 27001 (Information Security Management System incorporating), ISO 27017 (Information Security Controls for Cloud Services), ISO 27018 (Protection of Personally Identifiable Information on Public Clouds), ISO 27701 (Privacy Information Management), ISO 9001 (Quality Management System), ISO 20000-1 (Information technology –Service Management System), ISO 20400 (Sustainable Procurement), ISO 50001 (Energy Management System)

Sustainable Finance

Alpha Bank has developed and published its Sustainable Finance Framework (SFF or framework) to raise awareness on the commitment to sustainable finance and to enhance transparency. The framework constitutes the basis for the Bank's sustainable lending strategy as well as supporting future funding operations by defining the use of proceeds and impact assessment of financings.

The **Sustainable Finance Framework** incorporates environmental and social credentials in lending activities and stipulates the decision and classification process that we implement to classify our financial products and services as sustainable. It also serves as a guide during the development of sustainable financing products with specific green or social use of proceeds. The purpose of the framework is to contribute to Alpha Bank's sustainability objectives and commitments by mobilizing capital to sustainable economic activities.

The framework has been prepared with reference to the core principles and recommendations of the International Capital Market Association (ICMA) and the Loan Market Association (LMA) as well as the EU Taxonomy Regulation. An External Review of the framework was conducted by an independent third party to validate the environmental and social credentials for positive contribution to the UN Sustainable Development Goals (SDGs) and to demonstrate its credibility as a tool for capital allocation decisions.

The Sustainable Finance Framework and the External Review are published on Alpha Bank ESG Reporting Hub, available here.

Alpha Bank classifies its sustainable financing solutions into the categories of dedicated-purpose financing and general-purpose financing, aiming at establishing an overarching set of sustainability guardrails across the Bank's operating system; creating a coherent path for more coordinated action; producing metrics to track performance; and creating meaningful sustainability results both for the Bank and its clients.

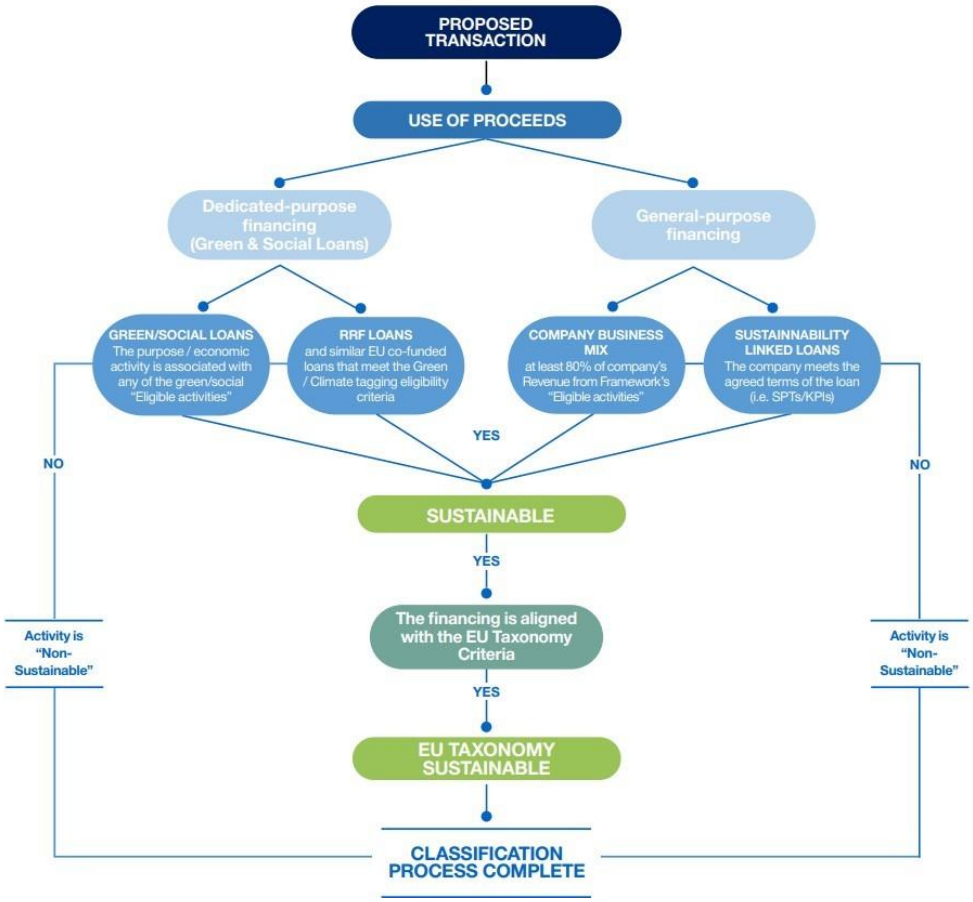
A. **Dedicated Purpose Financing**

- *Green/Social Loans*: The funds are 100% directed towards a project/investment listed under the eligible green/social criteria.
- *Recovery and Resilience Facility (RRF financing) and similar EU co-funded loans.*

B. **General Purpose Financing**

- *Company Business Mix:* When a company derives a certain percentage (at least 80%) of its revenues from eligible activities.
- *Sustainability-Linked Loans/Facilities:* General Purpose financing that is linked with measurable ESG targets at obligor level based on pre-determined sustainability performance targets agreed with the client.

Sustainable Finance Framework decision process diagram:



Green eligible categories are grouped into five distinct themes: **Energy efficiency, Green Buildings, Renewable Energy, Sustainable Transport and Resource efficiency and Pollution Control**. Each theme is divided into sub-themes to facilitate activities' categorization purposes. Exclusions may apply at the activity level.

Sustainable Finance Framework, Green and Social loan themes:

The underwriting process was revised to incorporate ESG factors and risks at the point of loan origination. Specific policies and procedures are in place when providing environmentally sustainable lending, including processes for assessing the credibility and business objectives of clients related to ESG. In that context, in December 2023 it was issued the revised "C*limate related, environmental, social and governance risk management policy on group's business lending*" as well as the revised Wholesale Banking Credit Manual.

The ESG assessments performed as part of the approval process, are as follows:

(i) ESG obligor assessment,

(ii) ESG transaction assessment,

(iii) Overall ESG assessment per transaction which determines the overall or combined ESG score

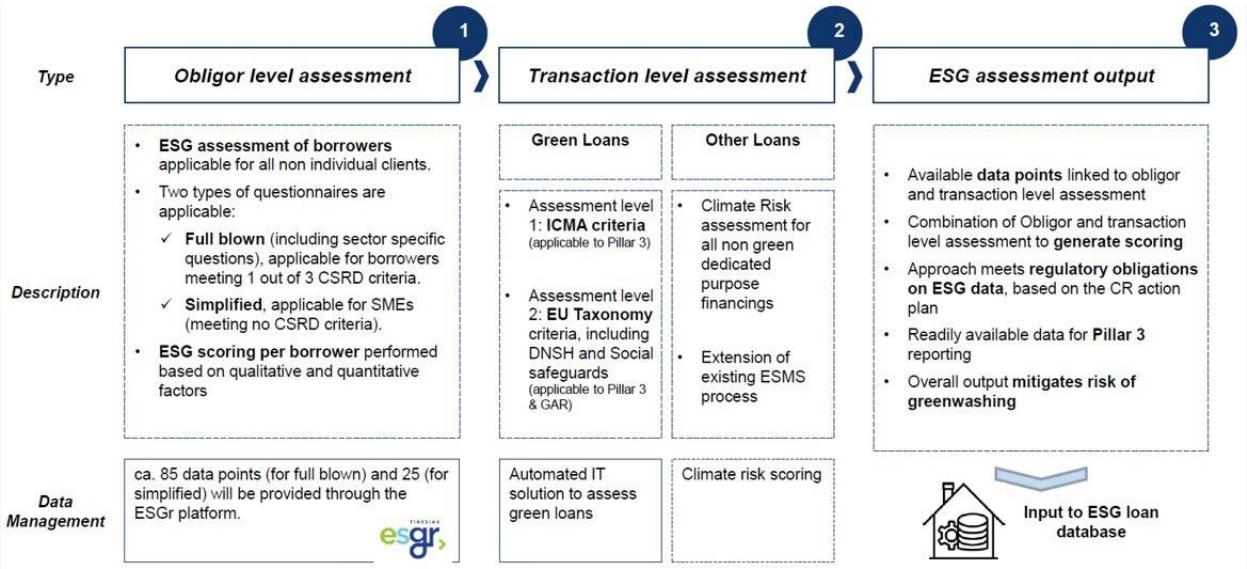
(iv) integration of the ESG assessments into the credit approval process.

Environmental, Social and Governance Risk in the client base and credit decisions

Alpha Bank has implemented assessment processes for ESG including Social risks arising from customer activities, via the introduction of an ESG questionnaire, which is operated by the Hellenic Bank Association on behalf of all Greek Banks on a common IT platform. The questionnaire which is compulsory for all clients on an annual basis, is tailored to their size and sector of economic activity, so micro enterprises and small businesses have a relatively smaller questionnaire, whereas larger corporates are assessed on a larger set of criteria, which are tailored to the particular characteristics of their business in terms of high levels of potential impacts in the environment or social factors. The questionnaire also assesses Governance factors in line with the company structure (i.e. listed vs-non-listed companies). Data from the questionnaire is used by the bank to derive an ESG Risk score for each client (the "Obligor Assessment"), based on the bank's own risk scoring methodology. The score is used in credit and pricing decisions, combined with an assessment of each individual transaction (the "Transaction Assessment").

The Transaction Assessment and Obligor Assessment are combined to derive the “Overall ESG Assessment” which then determines credit decisions and loan pricing, where Sustainable Finance Loans are selectively incentivized with lower pricing, while non-sustainable loans to clients characterized as “High ESG Risk” can be penalized with higher pricing. The exact range of these pricing variations is determined by the bank’s Credit Policy and the Sustainable Loan Pricing Strategy, both of which are periodically updated.

The above process ensures that all elements of Environmental (including Climate), Social and Governance risks in the client base are assessed on an annual basis and incorporated in each lending decision.



Favorable pricing scenarios with respect to the categories of dedicated-purpose loans, company business-mix loans and sustainability-linked loans are in place, in line with the transition dynamics of different sectors and eligible economic activities. For wholesale clients, the pricing scenarios considered are expected to differentiate between high climate risk sectors and depending on the availability of commercially viable transition investments, as well as low emission sectors. In terms of retail clients, the pricing scenarios will effectively address housing/vehicle loans and green consumer loans.

The cornerstone of Alpha Bank’s Sustainable Finance Strategy includes the design of specific financial products to enable its customers’ transition to low-carbon business models and carbon-reduction / climate defense technologies.

Retail financing initiatives

In the context of sustainable financing, the Bank offers a wide range of **“green” retail loans** (Alpha Green Solutions) with preferential interest rate which can cover consumers’ needs, such as:

- Purchase and renovation of a house classified at least under energy efficiency performance class B.

- Purchase of electric/hybrid cars, bicycles, motorcycles, and private charging points.

- Purchase and installation of home equipment, such as photovoltaic and solar panels, heat pumps, or natural gas boilers for a home energy upgrade.

To further enhance its commitment to sustainable environmental solutions, the Bank also participates in various State funded energy-saving programs such as “Exoikonomo 2023” and “Exoikonomo 2021”, and “e-Astypalea”. Alpha Bank, being the only Bank with presence on the island of Astypalea, is an integral member of the local community, contributing to the initiatives of the authorities for the creation of a clean mobility model island.

More details about the retail green products can be found on the Bank’s **website**.

Corporate financing initiatives

For corporate clients, the Bank provides financing opportunities in relation to “Greece 2.0 National Recovery and Resilience Plan”. Through the Recovery and Resilience Facility, the Bank provides financing for the green transition, with a focus on renewable energy sources. Eligible categories under the “green pillar” include green technologies, green skills, biodiversity, energy efficiency, building renovation, preservation of energy security, circular economy, sustainable development, and creation of jobs.

With respect to green solutions for small and medium size businesses, the Bank offers financing to install and operate photovoltaic stations as well as access to state programmes. The year marked the launch of the New Financing Programme of the Hellenic Development Bank (HDB) **“Green co-financing loans”** , with the purpose of financing mainly the upgrade of businesses energy efficiency and support investment plans for energy production from renewable energy (solar, wind etc.).

The Bank has a **specialized Project Finance Unit**, which works on securing financing for investments in Renewable Energy Sources (RES) projects, large infrastructure projects and Public-Private Partnerships (PPPs). New disbursements to projects related to renewables, waste, other energy and distribution networks and infrastructure confirm the Bank’s dominant position. Following the disbursement of credit, adherence to environmental terms and commitments is certified on an annual basis, throughout the long duration of such financing.

Investments

Since 2021, the Bank promotes **Impact Investing** to Private Banking Customers by creating an environmental “bonus” scheme linked to Structured Notes. Through this action, sustainable investing is impacting reforestation. Through the collaboration with “Reforest’ Action” and the Forest Research Institute, 60,786 trees have been financed for planting and specifically in 2024, nearly 4,648 trees have been financed for planting This effort has resulted in the storage of 697.2 thousand tons of CO2 and the creation of 14,052 natural shelters for wild animals according to the certificates the Group has received for the completion of each initiative. The above initiative is of great significance not only for the environment but also for the residents of the affected areas by the wildfires since the reforestation prevents severe floods. It also raises Customers’ awareness on environmental issues and at the same time has direct and measurable positive environmental impact from investments.

The Bank ensures it will not finance transactions that impose environmental or social threat, through the incorporation of the "**Group Environmental and Social Risk Management Policy on Legal Entities Lending**" in the Group's existing Credit Risk Management Framework and the Group's Credit Policy. An industry-specific list of economic activities[3] that the Group does not finance is provided. From 1.1.2024 the Bank applies an enhanced Exclusion List. The new included activities are among others "Any activity involving significant degradation, conversion or destruction of the sites included in the Natura map", "Wholesale and retail trade of thermal coal", "Conversion of natural forests into plantation".

Participation in global initiatives for sustainability

Alpha Bank actively participates in the global effort to build a sustainable future for the economy and the planet. In this context, the Bank has **joined the UN-convened Net Zero Banking Alliance (NZBA), committing to net zero greenhouse gas emissions by 2050.** This undertaking reflects the Bank's societal responsibility, as a leading financial institution in Greece, to help mitigate climate change and drive the transition to a net zero economy.

As part of its commitment to environmental stewardship, Alpha Bank has developed a **comprehensive strategy** to achieve net zero emissions, focusing on the following key actions:

- **Setting Science Based Targets for Financed Emissions**: To align with the NZBA overarching principles of setting and disclosing long-term and intermediate targets to support meeting a net zero by 2050 greenhouse gas emissions goal, the Group announced in 2024 the first-round of sector targets across its lending and investment portfolios. The process followed key steps:
    1. **Establishing an Emissions Baseline**: The Group established an emissions baseline by completing a comprehensive measurement of its financed emissions for 2022, covering investment and lending portfolios, across all financed sectors. The asset class coverage included on-balance sheet exposures in Listed and Unlisted Equity, Corporate Bonds, Sovereign Bonds, Corporate Loans, Commercial Real Estate (CRE), Residential Real Estate (RRE), Motor-Vehicle Loans and Project Finance. SMEs were excluded from the initial perimeter for target setting. The baseline measurement relied on the GHG emissions of its borrowers or investee companies and followed the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the PCAF.
    2. **Focusing on Carbon-Intensive Sectors:** As a second step, the target setting exercise focused on the financed emissions within the carbon-intensive sectors recommended by the NZBA. The sectors identified by the NZBA: agriculture, cement, coal, commercial and residential real estate, iron and steel, oil and gas, power generation and transport were mapped to internationally recognized sector classification codes applied by the Group.
    3. **Prioritizing Key Sectors for Target Setting**: the Group prioritized setting targets for the Power Generation, Oil and Gas, Cement and Iron and Steel sectors, taking into consideration each sector's materiality based on the financed emissions measurement, outstanding exposure, sectoral contribution to Greece's emissions, the availability of credible sectoral target-setting guidance, data quality and availability, as well as the market practice.

[3] More details are presented in the 2022 Sustainability report and Climate related (TCFD) reports.

4. **Selecting the Value Chain**: For each of the four priority sectors, the Group selected the parts of the sector's value chain that are most material to the Group by exposure and financed emissions, and in which the Bank's clients have the most control over their emissions. After accounting for the appropriate value chain, these sectors correspond to ~15% and ~54% of Bank's outstanding exposure and financed emissions, respectively, of the sectors in scope for the NZBA.

The targets are compatible with limiting global warming to 1.5C degrees because they employ the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE) scenario as its benchmark pathway.

Alpha Bank recognizes the important role of financial institutions in mobilizing capital towards environmentally sustainable activities and in supporting their clients' transition to a low-carbon economy. The SFF serves as a key enabler to deliver the sustainable finance strategy of the Group by financing climate mitigation projects.

Loyal to its commitment towards the support of an environmentally sustainable economy and to mitigate climate change, the Group has an ambitious plan, with the main decarbonization levers being the increase in Sustainable Financings and the reduction of financings that may have a negative impact on climate and the environment. Additionally, the Group has developed policies and procedures to reduce its operational environmental footprint with the overarching aim being net-zero emissions and setting targets associated with this objective.

Alpha Bank actively participates in the global effort to build a sustainable future for the economy and the planet. The Group's strategy is to align all material elements of the loan and (on balance sheet) investment portfolio with a Science-Based 1.5C pathway, based on the International Energy Agency Net Zero Emissions (IEA NZE) Scenario, adapted to the Bank's portfolio composition and national characteristics as they apply. The first set of sectors for which targets have been set are Power Generation, Oil and Gas, Iron and Steel and Cement. These sectors correspond to ~20%[4] and ~64%[5] of the Bank's outstanding financed emissions, respectively of the sectors in scope for the NZBA. The metrics selected for targets are Carbon Intensity metrics for all the above sectors, except for Oil and Gas for which absolute emissions have been used.

The remaining material carbon-intensive sectors will be included in a subsequent round of target-setting within 2025 in accordance with the NZBA guidelines and in line with the goals of the Paris Agreement (containing global temperature rise to 1.5C and no more than 2C), as well as EU Law, Regulation and Policy (fit-for-55, EU Green Deal). Some sectors may be excluded from target setting due to either methodological limitations and/or due to their limited materiality to the Bank's portfolio.

[4] Before exclusions on segments on value chain covered and SMEs
[5] Excluding shipping financed emissions

Table 1. Summary of targets for Power, Oil & Gas, Cement, and Iron & Steel

Sector	Exposure, 2022 (€ Mn)	Scope of emissions	Metric	Reference scenario	Baseline year	Portfolio value (2022)	IEA value (2022)	IEA value (2030)	Bank target (2030)	Reduction, target vs baseline, %
Power	1,254	Scope 1	$kgCO_2e$ / MWh	IEA NZE2050	2022	223	460	186	132	41%
Oil & Gas	607	Scope 1,2	Indexed tCO_2e of 2022 = 100	IEA NZE2050	2022	100	100	77	74	26%
Cement	73	Scope 1,2	$kgCO_2e$ / t Cementitious product	IEA NZE2050	2022	687	628	465	584	15%
Iron & Steel	197	Scope 1,2	$kgCO_2e$ / t Steel	IEA NZE2050	2022	540	1,738	1,260	Intensity of portfolio to remain below the reference pathway	N/A

- **Financing sustainable projects**: Alpha Bank allocates capital to Green and Social investments, in line with its Sustainable Finance Framework, with emphasis on the power generation sector, buildings and transportation. Through sustainable financing, the Bank aims to support the development of low-carbon infrastructure and accelerate Greece's transition to an environmentally sustainable and resilient economy.
- **Engaging Customers**: The Bank is committed to support its customers transition to a low carbon economy, offering advice and flexible financing solutions while facilitating access to funding, via tools like the EU Resilience and Recovery Facility and the Hellenic Development Bank.
- **Reducing operational emissions**: The Bank implements energy-efficiency measures across all Branches, offices, and data centers to reduce its carbon footprint. This includes using electricity from renewable energy sources, optimizing energy consumption, and adopting sustainable practices in day-to-day Group operations.
- **Collaboration and advocacy**: Alpha Bank actively engages with its stakeholders, aiming to increase awareness and foster sustainable practices to the entire spectrum of financial and social activity.

In the same direction, the Bank is a signatory to the **Principles for Responsible Banking** (2019), which were developed as an international initiative of the United Nations – Environment Programme Finance Initiative (UNEP FI).

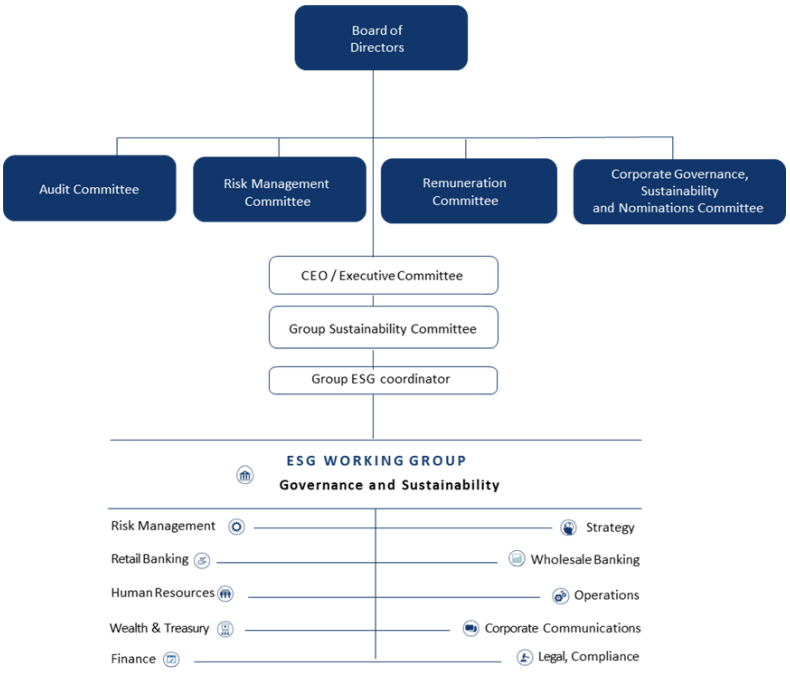
For the purpose of implementing the Principles for Responsible Banking, Alpha Bank has already submitted four self- assessment reports. It should be noted that at end of 2022, a new dedicated portfolio alignment analysis was conducted, in accordance with the UNEP FI Principles for Responsible Banking (PRB) Impact Analysis, using the Portfolio Impact Analysis Tool for Banks. Positive and negative impacts that the Bank creates through its institutional and consumer banking portfolios, were assessed, and mapped against the impact areas and topics of the revised Impact Radar (June 2022). The Bank identified positive and negative associations between its portfolio and the environmental, economic, and social areas defined by the UNEP FI PRB. The results of the analysis were used to define the Group's Sustainability Strategy, as per the Double Materiality Assessment section.

As part of the company's commitment to incorporate ESG criteria into its investment process, Alpha Asset Management M.F.M.C. has been a signatory of the United Nations-backed **Principles for Responsible Investment (**PRI) since December 2018. In September 2024, the company submitted its 2023 PRI Assessment report which covered the responsible investment activities occurred through 2023.

Governance

Alpha Bank's organization and operation are governed by the principles of integrity, honesty, objectivity and independence, confidentiality and discretion, disciplined and reasonable risk taking, transparency as provided for in the Bank's Code of Ethics and in the principles of Corporate Governance. There is focus to the identification, measurement and management of risks undertaken, to the compliance with the current legal and regulatory framework and to transparency with the provision of full, accurate and truthful information to the Bank's Stakeholders.

The following diagram presents the Organizational Structure for supervising and managing the implementation of the objectives, strategy, and policies in the context of Climate and ESG initiatives, as well as to effectively identify, manage, monitor and report the risks that might be also exposed.



Board level oversight

The Board of Directors (BoD) is responsible for managing the affairs of Alpha Bank and representing it vis-à-vis third parties. Further, it has the ultimate and overall responsibility for the Company and defines, oversees and is accountable for the implementation of the governance arrangements within the Company that ensure effective and prudent management.

The BoD, among others, supervises and approves the ESG objectives and commitments and it has the oversight of the Group risk management framework. Within this context, the BoD reviews the risk management strategy, delegates authorities to Committees and Senior Management for implementing the risk management strategy, reviews the overall risks assumed under the delegated authorities, provides guidelines, and ratifies the Group's risk appetite. Additionally, it promotes and ensures a robust risk and compliance culture.

Four Committees operate at Board level, namely the:

- Audit Committee,
- Risk Management Committee,
- Remuneration Committee,
- Corporate Governance, Sustainability and Nominations Committee.

The responsibilities of the above Committees in the context of ESG, among others, are as follows:

- **The Corporate Governance, Sustainability and Nominations Committee** acts as the ultimate liaison between the Board Committees and the Board, ensuring proper coordination with respect to all sustainability/ESG issues and promotes respective communications and feedback from all the Board of Directors Committees.
- **The Risk Management Committee** has oversight of the identification, monitoring, and management of Climate & Environmental risks.
- **The Remuneration Committee** is responsible for ensuring ESG metrics are incorporated in Remuneration Policies.
- **The Audit Committee** performs the oversight of the Non-Financial Information and Sustainability Report, sustainability and ESG disclosures.

The BoD, through the Risk Management Committee, receives regular reports by the Chief Risk Officer (CRO) and the Chief Financial Officer (CFO) on the implementation of the risk strategy and risk appetite of the Company and the Group.

Lines of reporting and frequency of reporting relating to environmental risk

The Risk Management Committee and the Corporate Governance Sustainability and Nominations Committee are informed, on an at least bi-monthly basis, by the Group ESG coordinator, the CRO, the General Manager of Wholesale Banking and the Chief of Corporate Center, on issues related to Sustainability and Climate Risk. Specific Climate & Environmental Risk KPIs are included in the Risk Management Committee report. In addition, the Risk Appetite Framework Dashboard, which is reported quarterly includes indicators on Climate & Environmental Risk.

The Chairman of each Committee endorses for approval by the BoD, specific items that are being discussed and the BoD proceeds to the final approval.

Executive level decision making

The Group Sustainability Committee (GSC) was established in November 2021 to approve and oversee the sustainability strategy and to steer all related initiatives. The Committee takes cognizance of and decides upon Sustainability and ESG related matters to ensure an internal governance framework that allows the Bank to manage ESG risks and consider all sustainability topics.

GSC membership includes five General Managers as permanent members and additional (non-voting) members at the senior executive level. During 2024, the committee met 10 times, highlighting Management's commitment to enhancing the Bank's sustainability position. The Group Sustainability Committee's agenda covered a range of topics, including progress of the Bank's ESG Action Plan, risk identification and materiality assessment of Climate Risk, Sustainable Finance strategy, setting Science Based Targets, as well as key disclosures and regulatory submissions.

Operational level implementation

At the Operational level, an **ESG Working Group** is in place to monitor, coordinate and implement key initiatives, led by the Group ESG Coordinator, who is also responsible for providing direction to subsidiaries and other units. The ESG Working Group represents all areas of the Bank that take ownership of ESG integration and ensures the flow of information across relevant teams.

The Bank's **Governance and Sustainability Business Area** drives the ESG agenda and ensures the adoption of best practices across the Group. In addition, high-level responsibilities are defined in the updated Operating Model emphasizing the ESG Strategy and ESG integration, including integral components of Sustainable Finance operationalization, stakeholder engagement and disclosures in line with regulation-driven and other initiatives. The Governance and Sustainability Division also leads communication and the exchange of knowledge and expertise between the Bank and its Group Companies.

The **Climate, ESG and Enterprise Risk Business Area** is an 'umbrella' and holistic risk function collaborating and coordinating the rest of Chief Risk Control Officer functions and Business Units, while undertaking a limited number of risks under its controlling capabilities related to Bank-wide and even Group matters. Among others, the Climate and ESG Risk function collaborates with the GSD Division and provides expert guidance for ESG integration in the risk management framework, supports consistency and adequacy of risk input across risk types, reviews questionnaires in the borrower assessment process, designs assessment methodologies (e.g. for physical climate risk) and is responsible for risk- related aspects of strategy-setting and business planning.

The Bank has implemented an **ESG Operating Model** across the three Lines of Defense which defines the roles and responsibilities of relevant divisions and their respective Management, on major activities and workflows relevant for Climate Risk and ESG issues.

Remuneration Policy

As per the 2024 Remuneration Policy of the BoD Members a Combined Bonus Plan (CBP) has been established which explicitly incorporates ESG criteria for Material Risk Takers including Senior Leadership Team (SLT) and directors. This includes short and long-term performance metrics, which may vary annually and are always approved by the BoD. In terms of short-term metrics and as part of the criteria for the payment of variable remuneration, specific ESG-related metrics are included that concern actions and initiatives that the Alpha Bank S.A. may be developing. In terms of long-term performance metrics, the CBP includes KPIs, such as sustainable finance disbursement targets, and female participation at middle management level and above. These metrics are linked to the material impacts, risks and opportunities

identified through our due diligence processes. As such, ESG criteria are incorporated in long-term incentive remuneration and are weighted at 20%.

The remuneration policy objectives and criteria will be continuously aligned with the evolution of the bank's strategy for Financed Emissions and the decarbonization of the portfolio. In addition, the policy also adhere to the principles of the United Nations Global Compact (UNGC) and the International Labor Organization (ILO) standards; comply with national labor laws and the European Union's directives on fair pay; align with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

11.1.2 Social Risk

Business Strategy and Processes

Social Risk in the client base and credit decisions

Social Risk arising from client activities are assessed via the "Obligor Assessment" questionnaire and process and incorporated in the bank's risk management framework, including the assessment of criteria for reputational risk arising from negative social impacts, which can trigger an additional risk assessment process with a dedicated questionnaire.

Risk arising from the Bank's own activities and financings

Double Materiality Assessment

Through the materiality analysis performed the Group has identified the following **social impact, risks and opportunities** for the short, mid- and long-term horizon:

- Material positive impact to the **livelihood own workforce through provision of secure employment, social dialogue and freedom of association**
- Material positive impact to own workforce through **improvement of diversity (contribution to Equality and Justice)**
- Material inherent risk through insufficient/ inadequate **training and skills development** of own workforce
- Material positive impact to Customers and broader society/economy through the Group's products/services and business relationships **(Access to Housing and Finance)**
- Material inherent risk through **data privacy issues relating to Customers**
- Material inherent risk through incomplete/ incorrect information for Customers **(unsuitable promotion practices from information disclosure perspective and inadequate disclosure of product terms)**
- Material inherent risk through the Group's products/services and business relationships with Customers **(product suitability issues, unsuitable promotion/ sales practices, and fiduciary breaches)**

- Material positive impact to Customers and broader society/economy through the Group's products/services and business relationships **(Contribution to Healthy Economies)**

In addition, the Bank also ran an internal exercise and determined the following risks that are related to social and governance matters that have been defined by the Greek Law 4548/2018 and could negatively affect the organization's operations:

- Conduct Risk
- ICT & Information Security
- Financial Crime risk
- Fraud Risk
- Execution, Delivery & Process Management
- Outsourcing Risk

Social Targets

Based on the identified impact areas, the Bank has set concrete targets to:

- Enhance people's financial health through inclusive access to financing
- Provide an Inclusive and Safe Work environment
- Support equal access to Healthcare, Education, Culture and Heritage

Social-related commitments and targets of Alpha Bank are presented in the following table: Foster Healthy Economies and Societal Progress			
Commitments	**Targets**	**Target Date**	**KPIs**
Enhance people's financial health through inclusive access to financing	Increase employment of young people by 20% (base year 2019)	2025	Percentage of Employees in the age group of 18-25
			Percentage of hirings in the age group of 18-25
	Support financial inclusion through educational programs addressed to teachers, students and people over 55, women & young entrepreneurs	Ongoing	Number of CSR programs implemented for the financial inclusion addressed to people over 55 years
	Increase access to people with mobility limitations to 85% of Branches	2025	Percentage of branches accessible (ramp or easily accessible) to people with disabilities (%)
	Full digitalization of banking services and increase of digital sales by 30%	2025	Percentage of all consumer loan applications were submitted via digital channels (%)
Provide an inclusive and safe work environment	Provide a safe and inclusive work environment	Annual	Number of injuries in the workplace
	Maintain >40% women representation in Managerial positions	Annual	Percentage of women in managerial positions
Support inclusivity and access to Healthcare, Education, Culture and Heritage	Support equal access to culture for people with disabilities, cognitive impairment, the elderly and children in remote areas	Ongoing	Number of CSR initiatives targeted to the provision of equal access to cultural programs
	Limited financing to activities that can affect health and well-being, including gambling, tobacco, and alcohol	Ongoing	Financing provided to gambling, tobacco and alcoholic beverages as % of total loan portfolio (aggregate financing cap of 5%)

Social Initiatives

Alpha Bank respects and promotes human rights through the business policies it applies, its responsible supply chain and the relations it develops with its Customers. Alpha Bank's Corporate Responsibility Policy and its Code of Conduct and Ethics describe its approach and commitment to the management of human rights. At the same time, it applies the law and follows internationally acclaimed directives, principles and initiatives to protect human rights, such as the Core Labor Conventions of the International Labor Organization (ILO) and the Universal Declaration of Human Rights (UDHR).The Bank recognizes the right to union membership and collective bargaining (see section "Social and employee matters – Alpha Bank's Management of this Report) and opposes all forms of child, forced or compulsory labor.

As stated in its **Corporate Responsibility Policy,** Alpha Bank respects and defends the diversity of its Employees and treats all Employees with respect. The Bank promotes a culture that fosters diversity and inclusion for its workforce and implements appropriate metrics to monitor diversity at all levels. For Alpha Bank, the integration of diversity and inclusion practices in its operating culture and, of course, in all aspects of its corporate and social activity is of paramount importance. To this end, it adopted a modern framework against bullying and harassment at the workplace since 2022.

A framework of interventions has been developed over the past years, not only with respect to providing equal opportunities for professional development, equal performance evaluation and rewards, but most importantly, a framework for personal development for women throughout their life cycle. A key part of these interventions has been the practice of mentoring, acceleration, and partnerships. Important examples of the empowerment initiatives implemented in 2024 were: The "Financial Literacy Lessons" program, a nine-month educational initiative exclusively addressed to female Employees of the Group mainly in managerial positions. The PosiDives program was a key initiative within the Group's DE&I strategy, exclusively addressed to female Employees at Manager, Expert, and Branch Manager level.

The Group acknowledges the importance of fostering a safe and healthy work environment and promotes a strong health and safety and wellbeing culture, by ensuring regulatory compliance and investing in efficient health and safety management, personnel consultation, and trainings.

To further strengthen HR communication with all employees, especially those who work remotely or are located outside of Athens, and improve employee experience and engagement, a new communication platform was launched (#talk2us), through which employee can book appointments with Human Resources Business Partners (HRBPs) who act as 'people advocates' and serve as a first point of contact for employees to discuss and help resolve professional issues of concern.

As a mean to promote collaboration and networking, employee groups with common interests or characteristics, the "**Communities of Change**" were further developed within 2023 to facilitate:

- Learning from the unique experiences of employees capitalizing on their diverse professional backgrounds.
- Distributing best practices among Units in order to achieve the goal of shaping the next day for Alpha Bank.
- Nurturing cross-functional alliances for employees from different areas and promote collaboration.
- Establishing Alpha Bank as an employer of choice and introducing practices that enhance Bank's employee value proposition.

In 2023, Alpha Bank's strategic commitment to sustainable growth was extended, focusing strongly on empowering our People to unleash their potential. Central to the Group's Learning and Development capabilities is Alpha Bank's learning ecosystem ACE #together we grow which was enriched with the design and launch of specialized Academies (Digital, ESG).

Through the ESG Academy, the Bank aims to provide awareness and training to its employees on ESG and climate risks, aiming also to add the power of its brand name to the wider sustainability transition effort.

Table 2: Thematic areas addressed through ESG Academy

Horizontal Awareness	Technical capabilities for ESG
○ Understanding of the ESG components and their impact on the Banking Sector while inspiring behavioral change inside and outside of work ○ Fundamentals towards ESG integration ○ ESG Governance and Operating Model ○ Risk Management Framework ○ Sustainable Finance Framework ○ Business and Strategic Planning around ESG ○ Health and Safety Awareness	○ Sustainable Finance Framework Operationalization ○ Loan Origination Process (Integrating ESG criteria in lending and the transaction assessment process) ○ ESG scoring and modeling ○ Data Governance and Processes

During 2024, 79% of workforce of Alpha Bank Greece participated in training organized by the ESG Academy, while over 80% of retail and wholesale banking business Employees followed dedicated ESG lessons specializing on the understanding of the ESG landscape, the SFF the Bank has developed and the necessity of the ESG assessment. Employees across the Bank benefited from introductory eLearning courses on ESG fundamentals and the ESG Risks and Opportunities. A dedicated training was conducted on "ESG Risk Management for Risk Professionals" with participation of all Employees in risk management. Additionally, the Bank collaborated with the Hellenic Banking Association for the provision of an open-registration webinar on ESG and Sustainable Finance.

Sustainable Finance

Social eligible categories are grouped into four distinct themes: Economic inclusion, Affordable basic infrastructure, Access to essential services, Affordable housing. Each theme is divided into sub-themes to facilitate activities' categorization purposes. The framework targets socioeconomically disadvantaged population, living in rural areas or isolated islands with limited or inadequate basic infrastructure, undereducated, long-term unemployed and working population vulnerable at losing their job due to the energy transition. In addition, aging population, vulnerable youth, persons with different abilities or in need of medical attention. Exclusions may apply at the activity level.

More information can be found at the Environmental Risk section.

Investments

With the aim to increase its positive effect on society, through new business opportunities that generate value for all stakeholders, the Bank for the first time selected and promoted to its customers two issues of Social Bonds within the year. Social Bonds are defined bonds that have a social benefit, in the sense that the funds raised from their issuance, or equivalent amounts, are used to finance or refinance, in whole or in part, new and/or existing projects with social sustainability characteristics (Social Projects).

The criteria for the selection of the issues were based on their ability to cover areas such as basic social infrastructure (transport, drinking water and water supply, energy), access to basic social services (education, health, finance), housing, employment and unemployment reduction, food safety, technology and sustainability, elimination of socio-economic inequalities and ensuring equal opportunities for different social groups.

Finally, the Bank manages the social dimension of financing through its responsible financing approach, as explained in the S4- Consumers and End Users and Contribution to Healthy Economies sections of the Sustainability Statement within the Annual Report 2024 (p. 130-147).

Certified Management Systems (ISO)

The development of a comprehensive and effective Business Continuity Management (BCM) Framework ensures, to the maximum extent possible, the protection of the health and safety of Employees, the uninterrupted provision of services to Customers and other Stakeholders (Shareholders, business partners, suppliers, Regulatory and State Authorities etc.) and the minimization of the consequences (in terms of operation, finances, legal issues and reputation) in case of an unforeseen event which can affect its operation. The BCM processes of Alpha Bank Group include the assessment of climate related, environmental and social risks that may cause business disruption.

The BCM framework of the Alpha Bank Group is certified with ISO22301. The ISO22301 certification applies to certain divisions of Alpha Bank S.A., and the following subsidiaries: Alpha Leasing S.A., Alpha Finance Investment Services Single Member S.A., Alpha Supporting Services S.A.

Health and Safety

Alpha Bank was also certified in 2022 with an Occupational Health and Safety Management System in accordance with ISO 45001:2018 (for Alpha Bank S.A., Alpha Supporting Services S.A.), covering all its activities and employees. In addition, there is a permanent presence of Occupational Physicians within work premises with large number of Personnel, while the Bank engages with experts (i.e. psychologists) and offers Employees the opportunity for consultation and support services. Occupation Physicians are available full time to premises with many employees. Evacuation drills are scheduled by branches at least every 3 months. Training (both live events and e learning) are available to all, covering fire safety, emergencies, first aid and violence and harassment at the workplace.

All personnel are offered and covered by medical insurance. Additionally, licensed psychotherapists are available for off-site counselling at no cost, to employees. Alpha Bank seeks to continuously improve its management system while introducing new training programs and improving personnel participation.

Governance

The BoD and its Committees have oversight of all issues with the Corporate Governance, Sustainability and Nominations Committee having overall ownership of the Sustainability agenda, including Social Risks.

In this respect, over 2024 the Corporate Governance, Sustainability and Nominations Committee:

- Reviewed the Double Materiality Analysis which was conducted for the first year under the CSRD
- Monitored the disclosure strategy, drafting procedure and endorsed the Sustainability Statement under the CSRD and reviewed the relevant Limited Assurance Reports by an External Auditor.reviewed the material impact areas identified through the materiality analysis and
- Has been informed on the drafting and release of Task Force on Climate-related Financial Disclosures (TCFD) report.
- Received updates on the respective social-related targets and was informed on the ESG Workplan, the timeline for key disclosures and reviewed performance of the Group in implementing its sustainability strategy.

The Risk Management Committee was:

- Updated on ESG and Climate Risk, as well as on the progress of the ESG Workplan and Sustainability Disclosures.
- Informed on the Climate Net Target setting.

During 2024 the Audit Committee, among others:

- Monitored the Double Materiality Analysis
- Monitored the drafting procedure and approved the Sustainability Statement under the CSRD (first year of implementation) and endorsed for approval the Limited Assurance Report by an External Auditor.

The Remuneration Committee, during 2024, endorsed the Remuneration Policy as per Law 4548/2018 which was updated in order to incorporate, among others, disclosures on ESG criteria.

At the Executive level, the Group Sustainability Committee approves any new social initiatives and monitors its implementation to ensure alignment with the Group's overall Sustainability Strategy and targets.

The ESG Working Group, guided by the ESG Coordinator, represents all areas of the Bank that take ownership of ESG integration and ensures the flow of information across relevant teams. Those teams consist of specialists and dedicated representatives of relevant functions (Retail Banking, Wholesale Banking, Risk Management, Strategy, Human Resources, Wealth Management and Treasury, and others). Representatives from each area participating in the ESG Working Group form the Operating Committee, which is responsible for providing the Group Sustainability Committee with information on the progress of the respective ESG project areas, including social issues.

The Bank's Governance and Sustainability Business Area drives the ESG agenda and ensures the adoption of best practices across the Group. The Division also leads communication and the exchange of knowledge and expertise between the Bank and its Group Companies. In addition, high-level responsibilities are defined in the updated Operating Model emphasizing ESG Strategy and ESG integration.

11.1.3 Governance Risk

Regarding the governance processes of Alpha Bank, including Committees, see also the governance as described in the respective environmental and social risk sections.

Double Materiality Assessment

Alpha Bank Group is committed to conducting business according to applicable laws, rules, regulations and the highest ethical standards, as an essential element of the responsibility towards its Customers, other Stakeholders and Shareholders for the protection of the reputation and long-term success of business. Through the materiality analysis performed the Group identified the following **impact, and risks** related to Business Conduct for the short, mid- and long-term horizon:

- Material positive impact to stakeholders across the value chain through initiatives that foster an ethical corporate culture **(Contribution to Transparency and the Rule of Law)**
- Material inherent risk through **AML issues** across the value chain (AML/ CFT issues)

Targets

Governance-related commitments and targets of the Group are presented in the following table:

Ensure Robust and Transparent Governance			
Commitments	**Targets**	**Target Date**	**KPIs**
Ensure the Diversity and Independence of the BoD	A majority of Independent Members in the Board of Directors and its Committees	2025	Percentage of Independent Non-Executive Members of the Board of Directors
Embed sustainability in Governance practices and Strategy	A minimum of 40% female representation in Non-Executive Board Members	2025	Percentage of Female Board Members
	Proactive engagement with Investors and Stakeholders to align priorities	2025	Number of engagement initiatives/ meetings with Investors and Stakeholders to align priorities
	Increase material information disclosure to all Stakeholders	2025	Number of Sustainability- related publications within the year
Enhance transparency and safeguard business ethics	Incorporate ESG criteria in our Remuneration and Risk Management frameworks	2025	Embed ESG criteria in Directors' Remuneration Policy
	Safeguard internal risk controls that protect the Customers' data	2025	Personal Data breach incidents (number of incidents notified to the Personal Data Protection Authorities)

With respect to counterparties, the Group has incorporated the "Environmental and Social Risk Management Policy on Legal Entities Lending" in the Group's existing Credit Risk Management Framework and the Group's Credit Policy, thereby enhancing the effective management of the environmental and social dimension of financing. The Policy presents the responsibilities and the approach followed in managing environmental and social risk at every stage of the lending process and also provides an industry-specific Exclusion List (i.e. a list of sectors that the Group does not finance), as well as a list of crucial industry sectors/activities associated with environmental and social risk.

For corporate clients in the wholesale banking and the retail Small Business Unit, the Bank has developed ESG customer assessment questionnaires, aiming at collecting data and assessing the borrowers in terms of ESG criteria.

The Bank also applies a granular sector-specific customer assessment during the credit origination process that assesses material topics for designated sectors against certain environmental, social and governance criteria. Those customers whose economic activity falls into the CPRS[6] perimeter, tobacco & gambling will be assessed through the sector-specific questionnaire. For customers, whose economic activity falls into the non- CPRS perimeter, a sector agnostic assessment will be applied, considering fundamental aspects of ESG criteria that are common across all sectors.

The **ESG customer assessment questionnaires** comprise three independent sections (Environmental, Social, Governance). Each of the Environmental & Social sections is further segmented into:

- **Management approach**: Captures customer's ability to manage Environmental and Social factors.
- **Evaluation of the Management approach**: Captures customer's ability to evaluate the management approach for Environmental and Social factors.
- **Performance Assessment**: Assesses customer's efficiency regarding Environmental and Social factors and detects whether the customer keeps track of quantitative sector-specific information.

Governance assessment is common across sectors and captures the decision-making process and roles & responsibilities regarding Environmental and Social factors.

[6] The Climate Policy Relevant Sectors (CPRS) is a classification of economic activities to assess climate transition risk, first developed in the article by Battiston et al. (2017) published on Nature Climate Change. CPRS is identified considering: i) role in the energy value chain (technology), ii) role in the GHG emissions chain, iii) specific policy processes and iv) business model (input substitutability of fossil fuel)

ESG criteria to evaluate corporate customers:

The Bank has re-designed the ESG risk assessment approach through the application of changes in several aspects of credit origination. The updated approach assesses both quantitatively and qualitatively ESG aspects of obligors through questionnaires that capture ESG risks relevant per sector (based on materiality principles), as well as transaction-specific characteristics in order to adequately evaluate their ESG risk profile. The Bank has also developed ESG scorecards for assessing the Obligors.

The ESG questionnaires consider relevant standards published by various organizations, such as the Sustainability Accounting Standards Board (SASB), the Carbon Disclosure Project (CDP), S&P Global, Fitch, Morgan Stanley Capital International (MSCI), International Petroleum Industry Environmental Conservation Association (IPIECA) and European Financial Reporting Advisory Group (EFRAG), as well as industry best practices.

When specific criteria are met, an environmental and social due diligence, i.e. on-site visit at customer's premises, is conducted by environmental and social specialists in order to assess customer's compliance with the respective legislation. Similarly, to assess the investments, the Project Finance team collaborates with specialized technical advisors on the projects' environmental licensing and environmental due diligence. Following the disbursement of credit, adherence to environmental terms and commitments is obligatory, throughout the long duration of the said financings.

Certified Management Systems (ISO)

Alpha Bank was distinguished for its organizational resilience, as it obtained a certification in accordance with the ISO 22316 international standard by TÜV AUSTRIA, becoming the first bank in Greece to obtain a certificate of compliance with this international standard. This distinction confirms Alpha Bank's commitment to best practices and innovative methodologies that ensure its successful adaptation and resilience to the changing business environment, as well as the smooth attainment of the objectives of its daily operation. At the same time, the adoption of the requirements of ISO 22316 standard helps create within Alpha Bank the right conditions to improve its ability to absorb, adapt and rise to the challenges of the changing business environment.

Finally, they are a strong factor in strengthening governance structures with a view successfully managing processes related to critical administrative and operational functions, such as, among others, strategic planning, cybersecurity management, risk and crisis management, financial control, fraud, environmental management, etc.

Governance Risk in the client base and credit decisions

Governance Risk arising from client activities are assessed via the “Obligor Assessment” questionnaire and process and incorporated in the bank’s risk management framework, including the assessment of criteria for reputational risk arising from poor Governance practices, which can trigger an additional risk assessment process with a dedicated questionnaire.

11.2 ESG Risk Management Framework

11.2.1 Environmental risk

Risk Management

The Group adopts a proactive approach to the management of Environmental, Social and Governance (ESG) risks. Emphasis is placed on risks arising from climate change, which is a key component of its Risk Management Strategy. Following the recommendations of the Task Force on Climate-related Financial Disclosures (“TCFD”), the Bank assesses current and upcoming environmental policies, legal requirements and regulatory guidelines relating to climate and the environment, in order to record and efficiently manage any transitional risks related to its activities.

The Group has developed a comprehensive action plan, submitted to the European Central Bank (ECB) in May 2021, in which it presented how the climate risk assessment would be incorporated in its operations and in the risk management process. The implementation of the plan began in June 2021, continued throughout 2022 and was enhanced, taking into consideration the feedback provided by the Single Supervisory Mechanism (SSM) in the context of the Climate Stress Test, conducted in January 2022, and the Thematic Review of Climate-related and Environmental Risk Strategies, Governance and Risk Management Frameworks, conducted in June 2022. Leveraging on the work already performed in 2023, the Bank has proceeded with targeted implementations in accordance with Group’s ESG plan commitments, which continues to be applicable in 2025.

The Bank, acknowledging the relevance and potential impact of the risks stemming from climate and environmental related factors, and especially climate change, and as part of its plan and in alignment with the respective external guidelines, has elaborated further on the ESG incorporation into the risk identification and materiality assessment processes and in the overall risk management framework, and is committed to monitoring, assessing, and managing these risks going forward. More specifically, the following activities have been performed:

- The Bank has enhanced its credit policy to incorporate the ESG obligor, transaction and overall per transaction (combination of obligor and transaction) assessment, into its credit approval process.

- The Bank has updated its Risk Inventory to provide a comprehensive overview of the enhancements and progress achieved in climate and nature-related risks in the Bank's Risk Registry. The main climate-risk transmission channels in the area of risk management include transition risk (e.g. the risk of any negative financial impact on the institution, stemming from the current or from prospective impacts of the transition to an environmentally-sustainable economy on its counterparties or its invested assets), physical risk (e.g. the risk of any negative financial impact on the institution, stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or its invested assets) and other social and nature-related risk aspects.
- In alignment with the guidance across different sources [e.g. ECB, European Banking Authority (EBA), European Commission], the Bank considers Climate and Environmental risks as a theme, i.e., as a transversal risk, incorporating such factors as drivers of existing financial and operational risk categories in its risk management framework. The Bank has enhanced its Materiality Assessment of ESG risks incorporating time horizons (short/ 2025-medium/2030-long time/2050) and identifying the sectors that are most vulnerable to climate and nature-related risks. In addition, with respect to nature-related factors, the Bank has examined the “inside-out” and “outside-in” impact by utilizing the UNEP FI and ENCORE tools.
- The Bank has developed a Reputational Risk Policy setting the principles and processes for managing reputational risk exposures, including those stemming from ESG factors.
- The Bank carries out regular training/awareness initiatives for its staff, to ensure that the Bank’s personnel is informed regarding climate-risk issues and Bank’ responsibilities in this area.
- The Bank safeguards that the infrastructure used for its core activities is insured against damages from extreme weather events, while the Bank also ensures that a robust Business Continuity Plan is in place, encompassing provisions for climate risk issues.
- The Bank aims to minimize and mitigate its reputational risk exposure stemming from obligors’ controversial activities. In this context, obligors’ controversial activities are assessed and taken into consideration by the respective Credit Committees. The controversial activities assessment has been incorporated into the credit approval process.

Climate & Environmental Risk Definitions and Risk Drivers

Climate, Environmental, Social and Governance (ESG) Risks are the risks of any negative financial impact to the Bank stemming from the current or prospective impacts of Climate and ESG factors on its counterparties or invested assets.

Moreover, ESG risks may directly impact the Bank’s operations and/or performance, in terms of process disruption, litigation/liability or reputation-related consequences. ESG factors may have an impact on the financial performance or solvency of an entity by manifesting themselves in financial or operational prudential risks, such as credit, market, operational, business and liquidity risks.

- **Environmental risks:** Environmental risks are the financial risks posed by the exposure of the Bank to counterparties or invested assets that may potentially be affected by/or contribute to the negative impacts of environmental factors, such as climate change and other forms of environmental degradation (e.g., air pollution, water pollution, scarcity of fresh water, land contamination, biodiversity loss and deforestation).
- **Climate-related risks:** Climate-related risks are the financial risks posed by the exposure of institutions to counterparties that may potentially contribute to or be affected by climate change. This could, for example, take the form of physical damage caused by extreme weather events or a decline in the asset value of a counterparty that operates in carbon-intensive sectors subject to taxation on CO2.

- Physical: Physical risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or invested assets. They are typically defined as risks which arise from the physical effects of climate change and environmental degradation and can be categorized as following:
  - Acute: which arise from particular/ extreme events, especially weather-related events such as droughts, storms, floods, fires or heatwaves, or other environmental hazards that may damage production facilities and disrupt value chains.
  - Chronic: which arise from longer-term trends (progressive shifts in climate and weather patterns or a gradual loss of ecosystem services), such as temperature changes, rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.
- Transition: Transition risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the transition to an environmentally sustainable economy on its counterparties or invested assets, including:
  - climate and environment related policy changes, for example, as a result of energy efficiency requirements, carbon-pricing mechanisms that increase the price of fossil fuels, or policies to encourage a sustainable use of environmental resources;
  - technological changes, for example, if a technology with a less damaging impact on the climate or the environment replaces a technology that is more damaging, hence making it obsolete or uncompetitive;
  - behavioral changes, for example, if the choices of consumers and investors shift towards products and services that are more sustainable; or if it becomes more difficult to attract and retain customers, employees, business partners and investors when a counterparty has a reputation for damaging the climate and the environment.
- Liability: Liability risk in the context of ESG factors relates to the risk stemming from people or businesses seeking compensation for losses they may have incurred due to ESG factors, e.g., when institutions' counterparties are held accountable for the negative impact, they have on ESG factors through their activities.[7]

In alignment with the relevant external guidance across different sources[8], Alpha Bank has incorporated ESG factors as drivers of existing risk categories (e.g. credit risk, operational risk, market risk, liquidity risk etc.) in its risk management framework. The table below provides an indicative illustration of the way existing risk types could be affected by Climate and Environmental drivers:

[7] Liability risks are sometimes considered either physical or transition risks. They could, however, also be considered a separate risk category as they may not only arise from climate-related and other environmental risks but also from social and governance risks.

[8] Some indicative regulatory and other references are:

i) In the 2020 ECB Guide on climate-related and environmental risks: "Institutions are expected to incorporate climate-related and environmental risks as drivers of existing risk categories into their risk management framework." and "Climate-related and environmental risks may, in fact, be drivers of several different risk categories and sub-categories of existing risk categories simultaneously."

ii) In the 2021 EBA Report on management and supervision of ESG risks for credit institutions and investment firms: *"The EBA recommends that institutions manage ESG risks as drivers of financial risks, in a manner consistent with the risk appetite, and as reflected in both the ICAAP and ILAAP frameworks."*

Indicative impact of Climate related and Environmental risk drivers				
Risk Type	**Transition**		**Physical**	
	Climate	**Environmental**	**Climate**	**Environmental**
Credit risk	- Impact on the credit risk parameters (PD, LGD, EAD) as a result of transition risk events, affecting the creditworthiness of counterparties (e.g. increased PD of companies sensitive to transition risk factors, impact on collateral values from physical risk related events and from disorderly transition to low-carbon economy).		- Impact on the credit risk parameters (PD, LGD, EAD) as a result of physical risk events, within sectors or geographies vulnerable to physical risk (e.g. through lower collateral valuations in real estate portfolios as a result of increased flood risk).	
Market risk	- Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from transition risk drivers leading to repricing of securities and derivatives).		- Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from physical events leading to repricing of securities and/or derivatives).	

Liquidity risk	- Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from transition risk drivers leading to repricing of securities and derivatives), which may reduce the value of high-quality liquid assets, thereby affecting the liquidity buffer.
	- Impact through Bank's ability to raise funds or liquidate assets, e.g.:
	  - The ability to access stable sources of funding is reduced.
	  - Climate-related asset classes/instruments are prioritized over other traditional asset classes/instruments.
	  - Deposits and credit lines are drawn down by counterparties.
			- Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from physical events leading to repricing of securities and derivatives), which may reduce the value of high-quality liquid assets, thereby affecting the liquidity buffer.
			- Impact through Bank's ability to raise funds or liquidate assets, e.g.:
			  - The ability to access stable sources of funding is reduced.
			  - Climate-related asset classes/instruments are prioritized over other traditional asset classes/instruments.
			- Deposits and credit lines are drawn down by counterparties.	

Operational risk	- The Bank may incur fines due to lack of consideration on compliance with environmental standards or as a result of the greenwashing, leading to conduct risk.		- The Bank's operations may be disrupted due to physical risk events, (e.g. extreme weather event) leading to damages to physical assets or critical infrastructure that is essential for providing services to customers (e.g. property, branches, energy supply, data centers etc.).	

iii) In the 2021 European commission final study, "Development of tools and mechanisms for the integration of environmental, social and governance (ESG) factors into the EU banking prudential framework and into banks' business strategies and investment policies": "*The majority of banks mentioned that this requires a clear mapping of ESG risks as drivers of existing risk types, rather than treatment as a stand-alone risk type", "Most banks that include ESG risks in their RAF fall under the second category, meaning they consider ESG risk as a transversal risk driver."* and *"Participants acknowledged the impact ESG risks can have on financial and non-financial risks, as opposed to considering ESG risk as a standalone risk type."*

iv) In the Climate Financial Risk Forum Guide 2020, "Risk Management Chapter": *"Good practice is to treat climate risk as a cross-cutting risk type that manifests through most of the established principal / standalone risk types."*

Indicative impact of Climate related and Environmental risk drivers				
Risk Type	**Transition**		**Physical**	
	Climate	**Environmental**	**Climate**	**Environmental**
Business & Strategic risk	- Failure to account for rising ESG factors, having as key drivers the potential shift in consumer preferences, behavioral/ demand patterns, market sentiment and the potential change in the competitive landscape, leading to misalignment of business model to market practices (e.g. not being able to finance the environmental transition).		- Failure to account for the occurrence of extended physical risk events (chronic and/or acute) impacting financed activities /sectors more vulnerable to such risks and consequently the Bank's business model	
Reputational risk	- Impact on the Bank's public perception and reputation and consequently in its valuation, considering also changing market and consumer sentiment, due to its association with activities and counterparties linked to adverse environmental impacts (e.g. financing of companies with significant polluting activities, investments in sectors with high GHG emissions etc.). - Continually rising stakeholder expectations in the area of climate risk (e.g. Bank's commitments regarding the mitigation of climate risk) could lead to reputational risk, if the Bank does not deliver fully on its position.		-	

Climate-related Risks Materiality Assessment

The Bank has incorporated Climate and ESG risks in its regular risk identification process. In the context of annual review of Climate and ESG materiality assessment, the Bank takes into account several factors, covering both financial materiality (e.g. exposures sensitive to Transition Risk factors as i) % of total assets and ii)% of total loan portfolio, or similar metrics), as well as qualitative factors, such as the perceived impact on the environment and society and potential reputational-related aspects, in alignment with the "double materiality" principle.

The Bank performs the identification and materiality assessment of ESG risks on an annual basis, as part of its broader recurring risk materiality assessment process.

From 2024 onwards, the Bank further enhanced its materiality assessment methodologies in order to incorporate time horizons across physical and transition risk in all risk types. The following table depicts a summary of the materiality assessment outcome of Climate factors on traditional risk types across the different time horizons, where materially affected risk types per type horizon are marked.

Risk Type	Transition Risk			Physical Risk		
	Short 2025	Medium 2030	Long 2050	Short 2025	Medium 2030	Long 2050
Credit risk		✓	✓		✓	✓
Market risk						
Liquidity risk						
Operational risk (incl. Legal)		✓	✓		✓	✓
Business & Strategic risk		✓	✓		✓	✓
Reputational risk		✓	✓		✓	✓

The risks are estimated in different time horizons, aligned with ESRS recommendations: (a) for the short-term time horizon: one year (2025); (b) for the medium-term time horizon: from the 2nd year and up to 5 years (2030); and (c) for the long-term time horizon: more than 5 years (2050). These horizons were chosen to align with scientific pathways that limit warming to 1.5°C. This requires halving global GHG emissions by 2030 and approaching zero by 2050. These time horizons are also in line with the Greek Climate Law that has set a target for net zero by 2050, and an interim target of reducing GHG emissions by 55% in 2030 compared to 1990 emissions.

Credit Risk – Transition Risk

NFC Portfolio

Credit risk is considered to be materially affected by transition risks in the Non-Financial Corporate (NFC) portfolio in the medium and long-term horizons. The assessment for the NFC portfolio examines the Bank's performing exposures within the ESG Sensitive Perimeter distributed to total average transition risk score for all time horizons (short-, medium- and long-term).

In particular, the Bank conducted a transition risk assessment exercise in its Non-Financial Corporations (NFC) portfolio. The determination of activities/sectors more sensitive to transition risk was based on a number of factors:

- Climate Policy Relevant Sectors (CPRS) perimeter,
- Sensitive sectors to transition risk according to Net Zero Banking Alliance (NZBA) and Long-Term Strategy for Greece for 2050 (LTS)
- Examination of the emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the short-term disorderly transition scenario that ECB published as part of the 2022 ECB climate stress test exercise.
- Exclusion of: i) RES loans, ii) dedicated-purpose sustainable loans that are aligned with EU Taxonomy (and substantially contribute to Climate Change Mitigation (CCM) objective) and iii) other loans that are sustainable according to the Bank's Sustainable Finance Framework, provided that they are linked to and affect Climate Change Mitigation (CCM) objective.

In addition, the Bank has conducted a top-down materiality assessment for transition risk sub-types per sector (market, technology, reputation, policy & legal) as proposed by the Task Force on Climate-Related Financial Disclosures (TCFD), in order to identify the climate-related transition risks that materially affect each sector.

Transition risk drivers have been analyzed considering sectoral transition requirements under the Net Zero (NZE) Scenario pathway, using a top-down approach. For this analysis, scenarios developed by IPCC and their implementation to Greece such as the national long-term strategy for 2050, the Greek climate law, the National Energy and Climate Plan and other scenarios from internationally acclaimed bodies (i.e., IEA), as well as Sectoral Decarbonization Approaches (SDA) from SBTi were utilized. Specifically, for each key sector, a set of risk drivers were defined in alignment with the NZE pathway providing an overview of relevant description to assess risk per sector. The analysis does not take into consideration the potential transition of the counterparty that the Bank is exposed to but rather analyses the inherent risk of the sector overall. Additionally, more recent literature is used, such as the updated National Energy and Climate Plan (NECP) released in August 2024.

Retail Portfolio

The Bank recognizes the materiality of Climate and Environmental risks in its retail portfolio, in terms of the energy efficiency of real estate collateral held by the Bank and is considered to be materially affected by transition risks in the Retail portfolio secured by Real Estate in the medium and long-term horizons. The assessment is based on the EPC distribution of the real estate assets and the minimum EPC requirements set in the “Report on the proposal for a Directive by the European Parliament and the Council concerning the recast of energy performance standards for non-residential buildings”. In this context, the Bank has incorporated in its credit decision making process the Energy Performance Certificate (EPC). In parallel, the Bank has developed a model in order to calculate proxies for the energy efficiency score and EPC label of collaterals without an EPC, that enabled the distribution of energy efficiency score bands and EPC label of the real estate properties included in the Bank’s portfolio (as real estate owned assets) or used as collateral on existing assets. Finally, the Bank participates actively in the collective initiative organized by the HBA and the Ministry of Environment & Energy which aims at the provision of access for the financial institutions to the EPC registry in order to facilitate the collection of actual EPCs and increase the rate of EPC over the total real estate pool.

Additionally, the Bank is evaluating approaches for assessing transition risk at a more granular level, enabling the identification and mitigation of potential risks. In general, materiality is a crucial consideration in ESG risk assessment. Given the bank’s overall portfolio composition, unsecured consumer portfolios do not seem to pose material risks in terms of financial performance or stakeholder concerns since currently these portfolios are not typically within the scope of economic sectors with significant ESG risks, as they do not involve resource consumption, emissions, labor practices, or community impacts to the same extent as other industries. Also, depending on the jurisdiction, regulations and reporting requirements may primarily focus on specific industries or sectors that have higher ESG risks or are considered strategically important. Unsecured portfolios do not fall within the mandatory reporting requirements.

Credit Risk – Physical Risk

The Bank has laid down a methodology based on sensitivity and exposure analysis to derive vulnerability to physical risk factors. Vulnerability analysis is performed to identify potential significant hazards per subsector covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties used as collateral extend. Leveraging the outcomes of the vulnerability assessment by sector and region, credit risk is considered immaterial in the short term but materially impacted by physical risks in the medium and long-term horizons. The first ESG materiality assessment performed in March 2023 for physical risk was through the execution of a vulnerability analysis (based on RCP 8.5 W/m2 scenario) of both, NACE sectors at a country level (Greece) and real estate properties at climate zones level, to 16 physical climate risks (8 chronic and 8 acute). More specifically, the vulnerability assessment aims to identify potential significant hazards and related risks and forms the basis for the decision to continue the risk assessment, while it is aligned with the Invest EU methodology ("Technical guidance on the climate proofing of infrastructure in the period 2021-2027") and with the "ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review"). The analysis was applied to the Business portfolio per 1-digit NACE sector (22 NACE codes) at a country level (Greece), while for exposures covered by real estate collateral the analysis was applied at a regional level for each of the 4 climatic zones in Greece (as defined by the Greek Ministry Environment & Energy), both for 16 climate risks and for selected (sea level rise, soil & coastal erosion, wildfire, cyclones/hurricane/typhoon, and floods), based on the location of the real estate property. The vulnerability analysis (either by NACE sector, or climatic zone) combines the outcome of the sensitivity analysis and the exposure analysis, categorizing physical climate risk as High, Medium or Low. From 2024 onward, the Bank uses a more granular approach for the physical risk assessment and examines separately the two main portfolios where physical risk has a profound impact: (1) Business portfolio and (2) Secured by real estate collaterals and REOs in short (2025), medium (2030) and long-term (2050) time horizons.

In order to achieve a more granular and detailed risk level analysis, the Bank has proceeded with:

1. the development of Sensitivity analysis for the effects of physical risks with the highest exposure on a country level (Heat stress, Water stress, Heatwaves, Droughts & Floods) at a more granular level of the top subsectors. The Bank proceeded with the development of Sensitivity analysis for the remaining eleven (11) physical risks (Changing temperature, Changing wind patterns, Changing precipitation patterns, Sea level rise, Soil and coastal erosion, Soil degradation, Coldwaves/ frost, Wildfire, Cyclone, hurricane, typhoon, storm and tornado, Heavy precipitation (rain, hail, snow/ ice), Landslide and subsidence), of the top subsectors.
2. a location-specific risk analysis for the effects of physical risks on real estate properties using geospatial mapping and local geographical characteristics. This analysis results to the vulnerability assessment at NUTS 3 level, which allows to assess materiality to the aforementioned selected hazards, in a more granular level in terms of the location of collaterals.

Based on the above extended sensitivity and location-specific risk analysis, it was observed that in both NACE sector level and NUTS3 level, there are limited exposures in NACE sectors lying within the High vulnerability perimeter (the range refers to acute, chronic and chronic & acute risks), as well as limited exposures in locations within the High vulnerability perimeter (the range depends on the timeframe considered – Short (2025) / medium (2030)/ Long (2050) and the type of physical risk – chronic, acute, chronic & acute). It is noted that the selected climate physical risks are a. Chronic: sea level rise, soil & coastal erosion and b. Acute: wildfire, cyclone/ hurricane/ typhoon/ storm/ tornado, floods. However,

from an inherent risk perspective, the Bank considers physical risk to be material, given that going forward it could significantly increase in case it is not appropriately monitored and managed.

Alpha Bank offers solutions for mortgage insurance through a full range of products including benefits associated with risks related to natural disasters such as flood, wildfires and storm. Moreover, the level of total insured amount is based on the real replacement cost of the building, based on the square meters of the household and the average construction value per square meter and not linked only with the loan amount. According to the Bank's Credit Policy, insurance for real estate assets pledged as collateral against fire and earthquake risks has been mandatory in previous years. Starting from January 1, 2024, insurance covering flood risk has also been compulsory for all new loan originations in addition to the existing fire and earthquake coverage.

Operational Risk

The Bank has identified within its database and assessed operational risk events that were driven by ESG risk factors. Despite the fact that the analysis showed very limited materiality of such events, the Bank has introduced certain enhancements to better manage, monitor and mitigate ESG-related risks, effectively acknowledging that there are potentially material ESG factors that could drive operational risk in the future and cause greater losses compared to historical ones. Such material ESG factors could be related to climate physical risk events such as extreme weather, causing damage to physical assets or critical infrastructure essential for providing services to customers (e.g., property, branches, energy supply, data centers). The Bank assessed the physical damage component of its operational risk focusing on its own-used assets and leveraging the current materiality assessment conducted for physical risk in real estate properties, as employed for credit risk. The Bank assessed the transition risk of its own used assets based on the Report on the proposal for a Directive by the European Parliament and the Council regarding the recast of energy performance standards for non-residential buildings, in order to monitor and mitigate potential risks such as fines for non-compliance with environmental standards. The outcomes of the aforementioned assessments conclude that Operational Risk is materially affected by transition and physical risks in the medium and long term.

Regarding Legal/Litigation risk component, and specifically Greenwashing Risk, is deemed immaterial in the short term, due to limited sustainable financing exposure, and materially affected by C&E risks in medium and long-term, taking into the following considerations: i) the EBA guideline on Green Mortgages and EBA's report "Greenwashing monitoring and supervision" and the relevant EBA report on Green Loans & Mortgages, ii) the limited current number of exposures and anticipated increased exposures in the future related to sustainable financings and the iii) the greenwashing risk related scenario: "Fine imposed to the Bank due to Greenwashing". More specifically, the Bank has introduced enhancements to better identify, manage, mitigate and monitor legal risk driven by ESG-related factors. Emphasis is placed to ESG-related legal risk due to customer and third-party controversial activities (through enhancements on the obligor assessment process), as well as to internal mitigating actions that are being established to prevent greenwashing going forward (through the introductions of internal controls around the identification and tagging of sustainable finance exposures). More specifically, the Operational Risk Platform (Archer) has been enhanced incorporating a flag for the classification of ESG Risk lawsuits and all labor lawsuits have already been classified as "Social Risk related". As far as the commercial lawsuits are concerned, a mechanism has been initiated in cooperation with the Civil, Administrative, Criminal Law Disputes and NPEs' Legal Support Business Area to identify, flag and report relevant cases accordingly.

Additionally, the Bank continues to implement the following components to monitor and manage ESG Factors from an Operational Risk perspective:

- Risk Taxonomy: The Bank has enhanced its Risk Taxonomy to include the E, S and G flags which will be used to capture and monitor environmental, social and governance factors.
- Operational Risk Events Management: Operational risk events are mapped to respective risks and flags of the Risk Taxonomy. Existing and prospective events are mapped to the appropriate ESG flag as required. This allows the Bank to swiftly define the perimeter of environmental, social and governance events within the loss dataset.
- Risk and Control Self-Assessment (RCSA): The update of the Risk Taxonomy has an impact on the RCSA exercise as each risk and control is mapped to respective risks and flags of the Risk Taxonomy. Therefore, RCSA risks, and controls related to environmental, social and governance risks are mapped to the ESG flag as applicable and the results of the RCSA can be used to measure the impact of environmental, social and governance factors the Bank faces.
- Scenario analysis: The bank has incorporated ESG-related scenarios into its scenario analysis exercise to assess the impact of extreme events that may significantly harm the bank's profitability and reputation. These scenarios are evaluated within a specific perimeter and mapped to the bank's risk taxonomy, which now includes the newly introduced ESG flag.
- Key Risk Indicators (KRIs): Through the regular monitoring of success ratios/indicators (KPIs) the Bank demonstrates the effectiveness of the underlying safeguards against climate-related, environmental and social risk events. These KPIs have been included in the ISO22301 (Business Continuity Management System) of the Group and are subject to annual audits by the certification body (TUV AUSTRIA), and the internal audit function of the Bank. Moreover, the Bank has also introduced specific KRIs for monitoring ESG risk exposures.
- Outsourcing Risk Assessment: The Bank's Vendor Risk Assessment Questionnaire has been enhanced to incorporate questions regarding ESG risk drivers that might affect vendors' operations and consequently the services offered to the Bank. Also, considerations taking into account the new Operational Resilience Framework have been incorporated in the Questionnaire.

Although historical data do not reflect material losses from ESG-related events in the short-run, the Bank introduced the abovementioned enhancements to better manage, monitor and mitigate ESG-related risks, effectively acknowledging that there are material ESG factors (as depicted in the RCSA and Scenario Analysis processes) that will drive operational risk in the medium/long run and cause greater losses compared to historical ones. Moreover, such events may have material reputational impact in the future, due to the shifting expectations of customers and the broader society around ESG matters.

Market Risk

Based on the materiality assessment of the Bank's bond portfolio, there seems to be limited potential effect from climate related and other ESG factors in all three horizons for both transition and physical risk. The materiality assessment of the Bank's bond portfolio using the Transition Sensitive perimeter (combination of the Climate Policy Relevant Sectors (CPRS), Net Zero Banking Alliance (NZBA) and Long Term Strategy (LTS), as described in Credit Risk), taking also into consideration the average residual maturity of the ESG sensitive perimeter, in order to identify the portfolio's sensitivity to climate risks that are expected to materialize in long-term horizons. The bank has also proceeded with a materiality assessment of the Physical risk from chronic, acute and both acute and chronic events, for the Corporate Portfolio of Greek Issuers. With respect to sovereign bonds, which constitute the majority of the Bank's bond portfolio, these primarily relate to issuers that are either EU member states, while a quite immaterial exposure is outside the Union (towards USA) that has a "strong" currency and is in position to manage extreme physical risk events without material impacts on their overall economic stability and prospects. The materiality of ESG factors on the prices of EU members' issuances is considered particularly limited, considering that coordinated actions at the EU level (e.g. through recovery packages, state of emergency frameworks etc.) will be taken, in case any of these countries was severely impacted by environmental factors, primarily concerning physical risk. Furthermore, the Bank has incorporated a more comprehensive analysis of the Equity and Funds portfolio in relation to Climate risk, despite the immaterial size of the portfolio. The assessments employed are aligned with the methodology of Credit Risk.

Liquidity Risk

There seems to be no material effect from climate – related and other ESG factors analyzing the impact on both assets and liabilities. On the asset side, the main concern is the potential volatility in the value of liquidity buffer assets, primarily sovereign and corporate bonds, due to climate-related factors. The exposure is considered low due to the predominance of EU-issued sovereign bonds. On the liability side, key funding sources, such as secured and unsecured funding and deposits, were evaluated for potential risks arising from ESG factors, including shifts in investor preferences and depositor behavior. Secured funding, predominantly backed by high-quality, ECB-eligible collateral, has low risk, while unsecured funding faces minimal climate-related challenges as the Bank actively monitors green bond market trends. Deposits, the primary funding source, were assessed for transition and physical risks. For non-financial corporates (NFCs), the sensitivity to ESG factors was mapped to sectors, with most deposits classified as low-risk. Similarly, individual deposits were geographically assessed for climate vulnerability, revealing a well-diversified base with low overall risk. The assessment leveraged qualitative and scenario-based analyses, considering acute climate risks across short-, medium-, and long-term horizons. The findings indicate that climate-related and ESG factors currently pose low material liquidity risk. However, the Bank acknowledges potential future risks and is committed to revising its framework as necessary to address emerging ESG and climate challenges.

Reputational Risk

Reputational risk is considered to be materially affected by C&E risks in the medium and long-term. Specifically, reputational risk is generally considered to arise as a result of the manifestation of other risk types (i.e. a second-order impact such as Non-Financial Risks, Credit Risk, Liquidity Risk etc), while it could also give rise to other risk types subsequently (e.g. liquidity outflows, following a reputational impact). Reputational risk may affect the Group's ability to enter into new business relationships and to provide new services, as well as its ability to serve existing business relationships. The Bank has identified the following key drivers for reputational risk:

- *Greenwashing Risk*: Greenwashing or its perception is a material driver of reputational risk in the medium and long term. Risks may arise due to media campaigns, consumer complaints, and litigation alleging greenwashing or harmful environmental and social practices.
- *Laggers to Transition Risk*: Clients with delayed responses to transition risks, known as laggards, pose reputational risks.
- *Controversial Activities*: The Bank employs a Reputational Risk Assessment process to monitor obligors involved in controversial activities. Triggers, if activated, prompt an evaluation to assess the event's impact and remediation efforts. Similarly, vendor risks are assessed for ESG factors that may affect the Bank's reputation.

The Policy also describes the processes and mitigation actions for managing Reputational Risk (including those stemming from ESG factors) that may arise from:

- *Reputational Risk Assessment:* In the context of the Reputational Risk Assessment process, the Bank has designed an approach for identifying obligors involved in controversial activities. More specifically, the Reputational Risk Assessment questionnaire includes certain questions which are considered as triggers for Obligors with potentially controversial activities and which could potentially lead to Reputational Risk for the Bank. If triggers are activated, an assessment (through desktop review and/ or client communications) is required to understand the nature of the triggering event and to identify and evaluate remediation actions adopted by the client following the event. Based on the examination of the trigger, the Reputational Risk for the Bank is assessed, and any additional actions are determined.
- *Vendor Risk Assessment:* The Bank's Vendor Risk Assessment Questionnaire has been enhanced to incorporate questions regarding ESG risk drivers that might affect vendors' operations and consequently the services offered to the Bank and its reputation.

Although historical data do not reflect material losses from reputational risk ESG-related events, the Bank acknowledges that there are potentially material ESG factors that could drive reputational risk exposures in the future. Therefore, the Group will continue to closely monitor and manage the existing or potential reputational risk exposures stemming from ESG factors, as dictated by the Reputational Risk Policy.

Business and Strategic Risk – Transition Risk

Following the same approach with Credit risk, Business and strategic risk is considered to be materially affected by transition risk over the medium- and long-term horizons. The assessment examines the Gross Interest and Fees & Commissions Income of the Bank's performing portfolio within the ESG Sensitive Perimeter distributed to total average transition risk score for all time horizons (short-, medium- and long-term). The relevance of ESG factors in Business and Strategic Risk is reflected through the failure to account for rising ESG factors, considering both idiosyncratic (strategic) and systemic (business) components.

The Bank acknowledges that ESG factors could have a significant impact from a Business and Strategic Risk perspective. The impact on Business & Strategic risk would materialize through several drivers, including the Bank's inability to properly execute its strategy (e.g. not being able to finance the environmental transition), or changes in the customers' demand of various Bank's products (e.g. shift in market expectations for green products) and adjustments in the related product pricing due to ESG factors, with a financial impact on the Bank's interest income. The impact on profitability could also materialize from downward fees and commissions, as well as from the structure of the Bank's funding side (e.g. reliance to deposits from clientele not aligned to "green" strategies, prone to transition risk). Taking into consideration the above, a forgone profitability risk is observed through the reduced market share in the sustainable/transition finance market, which is relatively limited in the short-term, while the market share loss could lead to magnified impacts in the medium/long-term.

Another ESG driver that the Bank recognizes for the manifestation of business & strategic risk would be the design and execution of the transition strategy for its corporate portfolio, on an individual communication basis for large corporate customers, in the context of the more granular, sector-specific obligor credit assessment process to be implemented, incorporating ESG factors. The impact that ESG factors can have on Business and Strategic Risk is also highlighted by the fact that they can lead to significant reputational risk, as a second-order effect, in terms of a long-term impact on the Bank's brand and reputation (e.g. the Bank gradually lagging in terms of strategy and brand in ESG – related issues, compared to its peers).

The impact of the Bank's financing activity and overall strategic direction on the environment is often subject to public scrutiny and, hence, associated with reputational considerations. The Bank has performed the materiality assessment of Business and Strategic risk for the Gross Interest and Fees & Commissions income generated by the Non-Financial Corporations (NFC) portfolio, broken down to activities/sectors more sensitive to transition risk, based on the Climate Policy Relevant Sectors (CPRS), Net Zero Banking Alliance (NZBA) and Long-Term Strategy (LTS) for Greece perimeters by using the NACE code assigned at the obligor.

Business and Strategic Risk – Physical Risk

Business and strategic risk is considered immaterial in the short-term and materially affected by physical risks over the medium- and long-term horizons. Given that the Bank's strategy is closely tied to its loan book composition, a materiality assessment on physical risk was conducted for the Non-Financial Corporations (NFC) portfolio for the years 2025, 2030, and 2050. This assessment identified activities and sectors more vulnerable to physical risk, classifying the Gross Interest and Fees & Commissions Income of each sector based on vulnerability scores. The analysis was performed using the NACE code assigned at the obligor level.

Nature – Related Risks Materiality Assessment

With respect to nature-related factors, the following table summarizes the materiality per risk type for all time horizons:

Risk Type	Nature – Related Risks		
	Short (2025)	Medium (2030)	Long (2050)
Credit risk			✓
Market risk			
Liquidity risk			
Operational Risk		✓	✓
Business & Strategic risk			✓
Reputational risk		✓	✓

Credit Risk

Credit Risk is considered to be materially affected by nature-related risks (and more specifically by biodiversity) over long-term horizon.

The Bank has developed a comprehensive and granular risk materiality assessment per nature-related factor for obligors within the Non-Financial Corporates (NFC) perimeter. The analyses conducted, Impact and Dependency Analysis, present the materiality assessment of nature-related factors from an inherent risk perspective, that examines the “inside-out” and “outside-in” impact by utilizing the UNEP FI and ENCORE tool, respectively.

Impact Analysis

In order to enhance the relationship between specific activities/ NACE codes with negative impact on social & nature-related risks, performed an analysis based on additional information from the UNEP FI Portfolio Impact Analysis Tool. The Sector-Impact Map portrays the positive and negative associations between industries / sectors / activities on the three pillars of sustainable development (and therefore they are closely aligned with the UN Sustainable Development Goals (SDGs): social, socio-economic and natural environment through a holistic set of Impact Areas (such as Integrity & Security of Person, healthy economies and biodiversity & healthy ecosystems) and Impact Topics (such as soil, air, waterbodies, etc.) of the Impact Radar, as shown in the figure below. The mapping builds on resources such as the Environmental Health and Safety Guidelines of the International Finance Corporation, UNEP FI's Risk Briefings, as well as thematic resources such as ENCORE. The mapping has also benefited from the reviews of several specialist organizations. Based on this mapping, the Bank assessed the negative impact of the social and socio-economic pillars of sustainable development, as well as the negative impact of the environmental pillar in 6 different areas: Waterbodies, Air, Soil, Resource Intensity, Waste and Biodiversity (the latter consisting of the Species and Habitat categories) in its portfolio per sector, taking into consideration the relevant impact topics. As a second step, and for the sectors with a key negative impact on each nature-related topic, a risk assessment was performed using a literature review covering short-, medium-, and long-term horizons. Specifically, a sector-level assessment identified economic activities (at the NACE code level) with a high impact on nature and assessed their transition risk across material nature-related topics.

Figure: The Impact Radar

Dependency Analysis

ENCORE (Exploring Natural Capital Opportunities, Risks, and Exposure) is a tool developed by Global Canopy, the UNEP Finance Initiative, and UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC) to help assess nature-related risks by analyzing dependencies on natural resources. It evaluates the relationship between 25 ecosystem services and 271 economic activities using comprehensive literature reviews from scientific journals, peer-reviewed papers, grey literature, and targeted searches, including input from industry experts. This ensures a thorough assessment of critical ecosystem service dependencies for various economic sectors.

To identify and mitigate risks associated with other environmental and social factors, the Bank has established the following dedicated processes during its credit origination process such as:

- Exclusion list: List to encompass the additional activities with environmental and social impact (i.e., activities affecting biodiversity, pollution, social, etc), which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters.
- ESG Obligor Assessment Questionnaires: A bottom-up process including inter-banking industry-specific questionnaires, at the obligor level, which is used to evaluate the performance of each obligor on managing environmental, social and governance-related topics and better inform the credit origination processes in place.
  The industry-specific questionnaires assess obligors on a wide range of questions related to other environmental risks (e.g. biodiversity, pollution, water and liquid waste, etc.). The material topics per sector have been identified following a thorough review of the applicable reporting standards (i.e., SASB, Fitch, S&P Global and MSCI or other sector specific guidelines).
  In 2025, additionally, in response to the Omnibus Regulation, the Bank alongside with peers are evaluating the Interbank ESG Obligor questionnaires for potential alterations in accordance with recent adjustments. Further enhancement and recalibration of the Bank's ESG scorecards leveraging the data above may be required.
- Transaction Assessment: Evaluation of each requested transaction, on top of the assessment at obligor level aligned with specific criteria, as defined on the Bank's Sustainable Finance Framework, to identify and capture sustainable activities, as well as transaction-specific characteristics. In specific financing cases categorized as non-sustainable transactions according to the ESG transaction assessment outcome, a due diligence is carried out and a respective plan of corrective actions is drawn up with a schedule implementation on behalf of the customer if needed.
- Reputational Risk Assessment: Questionnaires to identify obligors involved in controversial activities including questions for Obligors triggering with potentially controversial activities and which could potentially lead to Reputational Risk for the Bank.

These processes have been developed in alignment with international standards and enable the Bank to mitigate ex ante environmental and/or social risks within its portfolio. Considering the effect of those processes, the residual risks associated with those environmental and social risk factors are considered to be immaterial on a portfolio basis.

Operational Risk

Operational risk, in alignment with the assessment of climate-related risks, appears to be materially affected by nature-related factors over the medium- and long-term horizons. The materiality assessment approach for nature-related risk is consistent with the methodology applied to climate risk. Specifically, regarding the Legal/Litigation Risk component of Operational Risk, the Bank has focused on assessing the materiality of Greenwashing Risk. Additionally, it has integrated ESG factors into its Operational Risk Management Framework to effectively monitor and manage these factors from an operational risk perspective.

Market Risk

Following the same methodology with Credit Risk, the Bank has performed a materiality assessment for Nature-Related Risks for Market Risk. Leveraging on the Impact and Dependency analyses, the Bank assesses the respective impacts and dependencies of its Corporate Bonds portfolio to nature-related topics. Market risk is currently immaterially affected by nature-related risks across time horizons, given the limited size of corporate bonds portfolio and the fact that for sovereign portfolio the materiality of ESG factors on the prices of EU members' issuances is considered particularly limited, considering that coordinated actions at the EU level will be taken, in case any of these countries was severely impacted by nature-related factors.

Liquidity Risk

For Liquidity Risk, there seems to be no material effect from nature-related factors across time horizons. On the asset liquidity side, this is driven by the composition of the buffer, mainly consisting of sovereign rather than corporate bonds, which are considered to be immaterially impacted by nature-related factors. On the funding side, deposits are the main funding source; corporate clients constitute a relatively smaller part of the bank's funding position limiting the exposure to ESG risks.

Reputational Risk

Reputational risk seems to be materially affected by nature-related factors in the medium and long-term horizon. The materiality assessment of reputational risk simultaneously considers i) the impact of Greenwashing Risk in alignment with the assessment of Climate-related risks and ii) the delayed response of clients to transition risks, as applied to Credit Risk related to nature-related risks. Regarding the laggers of the transition risk, a delayed response to nature-related transition risks by the bank's clients, has the potential to precipitate reputational harm for the financial institution. Therefore, a sector-level evaluation was conducted to identify economic activities with significant negative impacts on nature-related factors and to assess their transition risk across different time horizons"

Business & Strategic Risk

Business and strategic risk is considered to be materially affected by nature-related risks (and more specifically by biodiversity) over long-term horizon. Following the same methodology with Credit Risk, the Bank has performed a materiality assessment for Nature-Related Risks for Business and Strategic Risk. Utilizing the Impact and Dependency analyses outlined in the respective section of Credit Risk, the Bank evaluates the corresponding impacts and dependencies on environmental issues.

By the end of 2025, the Bank aims to further enhance its ESG Risk Materiality Assessment methodologies to ensure full alignment with the EBA's Guidelines on ESG Risk Management as well as the CSRD exercise. Planned enhancements will include the integration of financed emissions into the assessment framework, closer alignment with the Bank's transition plans and decarbonization targets, as well as the incorporation of emerging regulatory expectations and market best practices. In addition, improvements will be introduced in the approach to nature-related risks, with a particular focus on impact analysis.

Environmental Data related to Collection Structure, Quality and Accuracy

The Bank is committed to incorporating Climate & Environmental Risk Management into its operations. More specifically, the Bank recognizes the importance of reliable data and their proper use in order to produce useful information. The holistic data flow is assessed from the data capturing until the data usage, considering both the front lines' needs and the monitoring or reporting requirements. The introduction of the ESG related data follows the principles of Bank's Data Governance Framework for ensuring that the data governance procedures are effectively applied. The objective is to ensure high quality data is available, to support decision making both in terms of new credit approvals as well as to ensure clear visibility of the loan and investments portfolios' ESG related characteristics, enabling prudent and effective risk management of Climate & Environmental Risk.

The Bank has launched targeted initiatives to identify environmental data requirements and address data gaps within its systems. Specifically, the Bank has centralized data related to the CPRS sector and Physical Risk assessment on obligor and real estate levels, ensuring both credit assessment and reporting needs are efficiently met. Also, in order to assess the impact of climate risk on the calculation of Expected Credit Loss (ECL), detailed information on the ESG profile of the obligor and the real estate (e.g. location of real estate as well as information on EPCs) is being collected. These efforts aim to enhance data accuracy, reduce reliance on proxies, and improve client engagement to collect real data directly. By doing so, the Bank sought to ensure regulatory compliance, strengthen decision-making processes, and foster greater transparency in its operations.

For the long-term implementation of a comprehensive solution to incorporate all data requirements into the Bank's systems and data architecture, the Bank has planned and successfully executed a dedicated project with the aim to identify and define complementary needs in ESG data management to support business planning and needs, monitoring, management decision making and reporting purposes, through various deliverables in a phased approach. The project focused on identifying gaps in essential data, ensuring alignment with regulatory definitions. A Target Systems and Data Architecture, along with corresponding data requirements, was delivered in H1 2025. Implementation efforts have been initiated by the Bank's IT Division, in order to reach a higher level of maturity and full integration of Climate and Environmental Risk related data into the Bank's core systems. These efforts established a structured approach to managing Climate Risk data in compliance with ESG reporting requirements, including documentation of the Climate Risk Data Landscape, transforming it into business requirements for a comprehensive Data Schema/Model, and defining data sources and integration processes. Overall, the aim is to enhance the Bank's ability to effectively meet climate risk disclosure obligations.

Incorporation of C&E risk in Risk Management Framework & Scenario Analysis

Risk Management Framework

The Group has incorporated a set of quantitative indicators and qualitative commitments regarding climate risks into its Risk Appetite Framework (RAF) and climate risks have been integrated into the overall risk management framework.

In terms of quantitative indicators, the Bank enhanced and expanded its Climate and Environmental (C&E) indicators to address all material C&E risks, improve portfolio sustainability, and mitigate potential exposures. These indicators are fully integrated into the RAF. The Bank has a set ofC&E RAF indicators in Tier II status, having established limits and thresholds to align with the escalation process applied to all non-C&E RAF indicators.

During 2025, the Bank aims to assess potential enhancements to its Risk Appetite Framework upon conclusion of the materiality assessment, in line with the EBA Guidelines on ESG Risk Management, including the introduction of new indicators for material ESG risks, where deemed necessary.

Internal Reporting

The Bank designed and implemented a dedicated internal report including ESG metrics for loans and advances, which is presented on a quarterly basis to the Group Sustainability Committee and the Risk Management Committee, and through the RMC, to the Board members ensuring on-going monitoring, remediation and further escalation of issues arising, if necessary. The internal report includes information regarding Climate and Environmental risk across different portfolios (e.g., wholesale, retail etc.) by monitoring:

- loan exposures, new originations and income in Transition risk sensitive sectors, portfolios maturity and contribution of individual business units in the risk.
- collaterals' energy efficiency via the Energy Performance Certificate (EPC) for Collateralized loans by Real Estate

Physical risk of loan exposures, new originations and income by type of risk (chronic vs acute), region and the contribution of individual business units.

Scenario Analysis

As part of the ICAAP, institutions are expected to conduct a comprehensive and tailored review of their vulnerabilities through stress testing. These stress scenarios should encompass all material risks that could deplete internal capital or impact regulatory capital ratios and should be incorporated into the institution's stress-testing program from both an economic and normative perspective. Institutions are encouraged to consider scenarios that align with scientifically supported climate change pathways, such as those outlined by the IPCC. According to the materiality assessment the Bank conducted credit risk, operational risk and business & strategic risk are material in the medium- and long-term horizons (please see *"Climate-related Risks Materiality Assessment"* section for more details).

The Bank has developed a Climate Scenario Analysis methodology to support stress testing across all material risks, ensuring alignment with international best practices and ECB expectations. Regarding climate and environmental (C&E) risks to capital adequacy, from both economic and normative perspectives, the Bank has designed climate risk-specific methodologies to evaluate the impact of climate scenarios. These methodologies assess the effects of transition and physical risks on credit risk over the medium and long-term horizons. They leverage advanced global macroeconomic, sectoral, and natural catastrophe models, including those specifically tailored for Greece. For transition risks, the analysis incorporates factors such as buildings' energy efficiency, geographic attributes, and counterparty-level characteristics to account for the heterogeneous impacts of climate change. For physical risks, (chronic and acute risks – specifically flood and wildfire), the methodologies incorporate key factors such as geographic location and counterparty-level characteristics. The scenarios are analysed independently under both the Economic and Normative perspectives. Where relevant, they are also extended to operational, business and strategic risks, considering the outcomes of detailed risk materiality assessments.

Regarding estimations of the transition risks, the Bank is using models for different time-horizons (medium and long term), which comes along with a set of climate scenarios. This model draws its various climate scenarios from international organizations like the NGFS, IEA, and IPCC providing an impact quantification of these scenarios on key macroeconomic and sectoral variables across different time horizons.

The model is a leading macroeconomic model which provides a rigorous and consistent structure for forecasting and testing scenarios. It is a global, general equilibrium macroeconomic model which includes 85 countries and can be used to address questions on a wide range of economic variables. The framework used, is based upon three key components a) Climate policy levers, b) an electricity module, and c) a climate damage function which quantifies the relationship between environmental change and the resulting economic damages or losses (related to long-term physical risk scenarios). These components provide a rigorous and consistent structure for analyzing the implication of alternative climate scenarios, taking account linkages between economies such as trade and commodity prices.

Regarding physical risk in the short-term, the Bank has focused on specific acute risks, namely flood (Fluvial, pluvial and coastal flood) and wildfire, based on its ESG Risk Materiality assessment. The Bank has followed an approach similar to that of the 2022 ECB Stress Test, utilizing Average Annual Losses estimates from natural catastrophe model. In this scenario, it is assumed that severe floods and wildfires take place in Greece. These events bring in one year the losses that, on average, the country will experience in a 50 years' time horizon, which is a rather conservative assumption. While the probability of such an event is low, it allows the creation of relevant acute physical risk scenario.

Regarding the estimations of acute physical risks, the Bank has procured a solution to assess the expected economic impacts of acute physical risks on collaterals and economic activity. The assessment consists of three main physical risk components:

- **Hazard**: the geographical hazard can be seen as the probability of the residential real estate or the company to be hit by physical risk events, given their localization.
- **Vulnerability:** the vulnerability represents the non-dimensional impact (e.g. percentage damage on the asset value) in case of a natural event: for a building, it depends on structural characteristics which affect its resilience to natural events.

- **Exposure**: the exposure represents the value of the asset exposed to physical risks and is the main ingredient needed to translate an a-dimensional impact to monetary impacts.

The combined assessment of the three aforementioned components (exposure, hazard, and vulnerability) – which is coherent with the approach used for the development of the ECB climate-related statistical indicators - allows estimating the expected economic impacts arising from different acute physical risks.

The Bank follows a proportional approach regarding estimating acute physical risks using collateral specific characteristics versus regional averages depending on the collateral's materiality to the Real estate portfolio. More specifically, regarding collaterals representing a large share of collateralized exposures in terms of value losses are calculated using collateral specific characteristics such as specific location, intended usage (residential vs commercial) and year of construction. However, regarding collaterals representing an immaterial share of exposures estimates of losses at NUTS3 level are used.

The Bank assesses the impact of the transition to a lower carbon economy on Real Estate prices as expressed through changes to more energy efficient buildings indicated by collaterals' Energy Performance Certificates (EPC). Due to lack of publicly available data regarding building characteristics the Bank has used for this exercise a combination of data from its databases and external geospatial data. Specifically regarding EPCs these include both actual and estimated EPCs by the Bank's model. In parallel, the Bank is undertaking intensive efforts to increase the coverage of actual EPCs in its portfolio through a combination of individual and banking sector-wide initiatives.

For the Economic perspective, the Bank estimates the impact from climate scenarios in a similar fashion as in the Normative perspective. The impact calculated covers both transition and physical risk, taking into account the long-term nature of specific physical risk events (selection of scenario, use of relevant credit risk models to calculate impact), adopting the 1-year impact (2025) as Pillar 2 add-on hit, in line with the horizon applicable for the economic perspective aligned to ECB's supervisory expectations.

Additionally, regarding the climate risk impact on operational risk, the Group has adopted an AMA oriented quantification methodology with the intention to introduce a more risk sensitive estimation of the internal operational risk capital. In this respect, data from the Operational Risk Framework components (the operational risk events, the RCSA results and the Scenarios) are used in the capital calculations through a specific internal statistical model. For ESG Risk purposes, the Group has developed operational risk ESG related scenarios and has flagged ESG Risk-related operational risk events and RCSA risks accordingly. The abovementioned data is used in the model for capital calculation purposes. Using allocation techniques, the contribution of the ESG Risk factors to the Total Capital requirements is calculated. In addition to the above, a long-term horizon (2050) analysis providing an additional Pillar 2 add-on (yet without leading to a capital add-on considering the P1 capital is higher) has, also, been considered.

Regarding the impact of climate risks on business & strategic risk, the Bank performed an analysis in the economic and normative perspective, to quantify the forgone interest income based on the reduced EIRs of sustainable financings that are assumed in order to maintain the respective volumes and therefore cope with competition and the reduced net fee & commission income.

The total impact of climate risk on CET1 Capital has been calculated at 1.4% of total CET1 Capital. The climate risk impact estimated is bank specific since it depends on the internal assumptions followed during the ICAAP as well as on the internal models and the associated on respective climate scenarios.

Enhancements are currently under consideration and are expected to be finalized following the publication of the final EBA report on the “Guidelines for Scenario Analysis” (e.g., dynamic balance sheet approach, EPCs & nature-related scenario analysis in the long term). The exact scope and implementation of these improvements remain pending, subject to the final regulatory requirements.

ESG Risks in ILAAP

As mentioned above, the Bank has assessed the climate and environmental risk impact for the main products affected by key liquidity risks and concluded that the impact is immaterial. Given that the materiality assessment across all risk types is submitted in the ICAAP report, and that the liquidity risk impact is assessed as low, it was deemed unnecessary to include the analysis in the ILAAP report.

Credit Risk Models

In order to assess the impact of climate risk on the calculation of Expected Credit Loss (ECL), detailed information on the ESG profile of the obligor and the collateral (e.g. location of collateral as well as information on EPCs) is being collected. The information has been incorporated into the respective data systems and methodological approaches are examined to adapt the models for calculating the ECL. More specifically, the following are in progress:

- Data collection regarding ESG related information of the obligor through the use of the inter-banking ESG platform are ongoing in 2025.
- Further enhancement and recalibration of the Bank’s ESG scorecards leveraging the data above.
- The models assessing environmental, governance and social risks are validated in line with the Group Credit Risk Models Validation Framework.
- Enhancement/re-development of a Counterparty risk model that enables bottom-up adjustments to an obligor’s creditworthiness under certain climate scenarios.
- Incorporation of a real-estate value indexation model that is based on the EPC of the collateral. Development of an Action plan tool that applies specifically to high-risk customers.
- Identifying enhancements or additions to the current set of models used for risk parameter estimation and prediction, in order to integrate ESG risks.

In 2025, the models assessing environmental risks are validated in line with the Group Credit Risk Models Validation Framework. Furthermore, the Bank are in the process of identifying enhancements or additions to the current set of models used for risk parameter estimation and prediction, in order to integrate ESG risks (counterparty risk, impact by EPC).

Climate related, Environmental, Social and Governance Risk Management Policy on Group’s Business Lending

Alpha Bank Group is committed to sustainable finance, including the effective management of the Environmental dimension of its lending activities. To this direction, during the credit approval process, supplementary to the credit risk assessment, the climate related and environmental risk dimension is taken into account.

The “Climate related, Environmental, Social and Governance Risk Management Policy on Group’s Business Lending”, includes the basic principles and rules regarding the assessment of climate related, environmental, social and governance risks in the context of the Group's business lending approval process. The climate and ESG risks management approach is based on the Group's sustainability strategy and is part of the overall risk management framework. The Business and Credit Units of the Group have to implement all required procedures and tools in order to identify, assess, manage, offset,

minimize, and where feasible, eliminate climate and ESG risks that result from the obligor's/project's operations and are associated with credit exposures.

The purpose of the Policy is:

- To serve as a brief declaration of the Group's commitment to sustainable development and management of climate and ESG risks.
- To become the driver that enhances the continuous development of sustainable finance practices; and
- To provide the appropriate guidance on the way climate and ESG risks should be considered at all stages of the business lending credit process i.e. during assessment, approval, origination and credit risk monitoring.

The required climate and ESG risk assessment is conducted in parallel with the existing credit risk assessment process, according to the following principles and requirements:

- Definition of critical industry sectors that are connected with potential climate and ESG risks. In particular, definition of a:
  - Industry specific Exclusion List, i.e., a list of activities, established on specific criteria that address high climate and ESG risks, which are not funded by the Group.
  - Climate Policy Relevant Sectors' List, which is a classification of economic activities in terms of transition risk assessment. In particular, it is a standardized classification of activities (Nace Rev.2, four-digit level), based on their energy technology (e.g. based on fossil fuel, or renewable energy), whose revenues could be positively or negatively affected by a disorderly transition to a low-carbon economy.
- The applicable national and international laws and regulations on climate, environment, society and governance and relevant standards established with the Policy.
- The definition and implementation of climate and ESG risks assessment and monitoring procedures including ESG assessment at obligor, transaction and overall level in accordance with the provisions of the relevant Credit Policy Manuals, the due diligence conduction and the guidelines on the performance standards of the European Bank for Reconstruction and Development (EBRD).
- Managing Obligor's/Project's Non-Compliance with the Policy Rules and Standards.
- Annual Environmental and Social Performance Report to stakeholders (EBRD).

An enhanced credit assessment process took place according to the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" and the Credit Policy Manuals. The main amendments concern:

- ESG assessment per se, which is more holistic and is carried out at obligor, transaction and overall level. More specifically:
  - ESG assessment at obligor level is based on specific ESG questionnaires completed by the Clients. The answered questionnaires are scored via internal rating models and the outcome of the assessment may be Low, Medium or High ESG risk. Regarding the ESG obligor scoring process, a series of scorecards has been developed, based on the industry the obligor belongs to. The main inputs of the scorecards have been categorized to three groups, namely environmental ("E"), social ("S") and governance ("G"). A series of questions/variables that pertain to these groups have been collected (e.g. from sustainability reports) and have been used to train the scorecards, under the condition that E, S and G analytically derived scores converge to the target scores (externally sourced from LSEG Data & Analytics, formerly Refinitiv). Regarding the environmental component, the

questions have been grouped to three (3) sections; Management Approach (qualitative), evaluation of the Management Approach (qualitative and quantitative) and Performance Assessment (quantitative). The model weights have been optimized at the section level (such that the condition above has been met) and are allocated down to final metric weights. The model produces distinctive E, S and G (numerical) scores, which are aggregated to ESG scores, according to a weighting combination that depends on the industry of the obligor.

- ESG assessment at transaction level concerns the activity for which the client is applying or has received financing based on the information provided during the preparation of the credit request. The outcome of this assessment may be "sustainable" or "non-sustainable" financing. Sustainable financings are further divided into aligned or not aligned with the EU Taxonomy. Non-sustainable financings are rated and classified as Low, Medium, or High ESG risk.

- ESG overall assessment which is a combination of the ESG assessment at obligor and transaction level and is captured per transaction. The outcome of this assessment may be Low, Medium or Increased ESG Impact.

- Following the ESG assessment at obligor, transaction and overall level and considering the respective outcomes specific actions are defined in the Credit Policy, such as conduction of a due diligence (on-site visit) by a specialist, pricing adjustment.

- The Group has expanded its Exclusion List to encompass additional activities with environmental impact, such as “the conversion of natural forests into plantation”, “the wholesale and retail trade of thermal coal”, “the construction of new nuclear power plants”, “any activity involving significant degradation, conversion or destruction of the sites included in the Natura map”.

- The consideration of the “Climate Policy Relevant Sectors'” classification instead of the “EBRD Environmental and Social Risk Categorization List – Revised 2014” in the context of the ESG assessment.

The Group has enhanced its due diligence process with respect to the assessment of its Customers’ ESG/climate risk profile, through the collection of relevant information. This effort aims to ensure obligors' compliance with the Group's ESG requirements. The Group aims to finance its counterparties’ green/sustainable transition both in the short-and in the long-term. In 2025, the Bank is in the process of integrating ESG considerations in the due diligence process of Debt Securities.
It should also be noted that Bank’s Credit Policy stipulates that the energy performance of buildings securing loans must be considered during the credit approval process. In this vein the Energy Performance Certificate (EPC) is included in the documentation for the technical inspection of the property while relevant information is included in the credit proposal note and the core banking system. As regards the existing real estate collaterals it is noted that in the absence of an EPC a methodological approach is applied.

The Group with the aim to mitigate reputational risks has designed a robust process that involves identifying and assessing the potential participation of its Obligors in controversial activities.

Additionally, as a mitigating action to physical risk impact, the mandatory property insurance securing new financing that is provided to the Bank also includes the risk of flooding.

Next Steps

The Bank is looking to further enhance the incorporation of environmental aspects into its Risk Management Framework through actions that are currently underway and refer to the following areas:

- Further enhance ESG risk materiality assessment
- Track developments in the regulatory frameworks, including ESG guidelines and CSRD, and ensure alignment with the requirements.
- C&E responsibilities regarding compliance business area
- Assessing the Bank's Biodiversity Footprint

11.2.2 Social risk

Risk Management

Social risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of social factors on its counterparties or invested assets. Social factors are related to the rights, well-being and interests of people and communities, and include factors such as (in)equality, health, inclusiveness, labor relations, workplace health and safety, human capital and communities.

Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending

Alpha Bank Group is committed to sustainable finance, including the effective management of the social dimension of its lending activities. To this direction, during the credit approval process, supplementary to the credit risk assessment, the principles of a socially responsible credit facility are also examined.

The "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending", includes the basic principles and rules regarding the assessment of climate related, environmental, social and governance risks in the context of the Group's business lending approval process. The climate and ESG risks management approach is based on the Group's sustainability strategy and is part of the overall risk management framework. The Business and Credit Units of the Group have to implement all required procedures and tools in order to identify, assess, manage, offset, minimize, and where feasible, eliminate climate and ESG risks that result from the obligor's/project's operations and are associated with credit exposures.

The required social risk assessment is conducted in parallel with the existing credit risk assessment process, according to the following principles and requirements:

- Definition of an Industry specific Exclusion List, i.e., a list of activities, established on specific criteria that address inter alia high social risks which are not funded by the Group.
- The applicable national and international laws and regulations on the society and relevant standards established with the Policy;
- The definition and implementation of climate and ESG risks assessment and monitoring procedures including ESG assessment at obligor, transaction and overall level in accordance with the provisions of the relevant Credit Policy Manuals, the due diligence conduction and the guidelines on the performance standards of the European Bank for Reconstruction and Development (EBRD);
- Managing Obligor's/Project's Non-Compliance with the Policy Rules and Standards;
- Annual Environmental and Social Performance Report to stakeholders (EBRD).

An enhanced credit assessment process took place according to the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" and the Credit Policy Manuals. The main amendments concern:

- ESG assessment per se, which is more holistic and is carried out at obligor, transaction and overall level. More specifically:
    - ESG assessment at obligor level is based on specific ESG questionnaires completed by the Clients. The answered questionnaires are scored via internal rating models and the outcome of the assessment may be Low, Medium or High ESG risk. The main inputs of the scorecards have been categorized to three groups, namely environmental ("E"), social ("S")

and governance (“G”). A series of questions/variables that pertain to these groups have been collected (e.g. from sustainability reports) and have been used to train the scorecards, under the condition that E, S and G analytically derived scores converge to the target scores (externally sourced from LSEG Data & Analytics, formerly Refinitiv). Regarding the social component, the questions have been grouped to three (3) sections; Management Approach (qualitative), evaluation of the Management Approach (qualitative and quantitative) and Performance Assessment (quantitative). The model weights have been optimized at the section level (such that the condition above has been met) and are allocated down to final metric weights. The model produces distinctive E, S and G (numerical) scores, which are aggregated to ESG scores, according to a weighting combination that depends on the industry of the obligor. The scores are also mapped, via a rating scale, to twelve (12) ratings (between aaa and c-) and further to three (3) grades, according to a RAG (Red-Amber-Green) classification.

- ESG assessment at transaction level concerns the activity for which the client is applying or has received financing based on the information provided during the preparation of the credit request. The outcome of this assessment may be "sustainable" or "non-sustainable” financing. Sustainable financings are further divided into aligned or not aligned with the EU Taxonomy. Non-sustainable financings are rated and classified as Low, Medium, or High ESG risk.

- ESG overall assessment which is a combination of the ESG assessment at obligor and transaction level and is captured per transaction. The outcome of this assessment may be Low, Medium or Increased ESG Impact.

- Following the ESG assessment at obligor, transaction and overall level and considering the respective outcomes specific actions are defined in the Credit Policy, such as conduction of a due diligence (on-site visit) by a specialist, pricing adjustment.

- As of January 1, 2024, the Group has expanded its Exclusion List to encompass additional activities with social impact, such as the financing of “clients who are involved in violations of human rights, according to the United Nations “Universal Declaration of Human Rights”.

The Group has enhanced its due diligence process with respect to the assessment of its Customers’ ESG/climate risk profile, through the collection of relevant information. This effort aims to ensure obligors' compliance with the Group's ESG requirements. The Group aims to finance its counterparties’ social/sustainable transition both in the short-and in the long-term.

The Group with the aim of mitigating reputational risks has designed a robust process that involves identifying and assessing the potential participation of its Obligors in controversial activities.

Social Risk Materiality Assessment

Credit Risk

Social risks in regard with Credit Risk, are assessed based on the gross carrying amounts of the NFC portfolio & their key negative impacts to Social factors. Taking also into account the various processes and controls established by the Bank (e.g. standard KYC process, ESMS process etc.), it is anticipated that no material risks will arise from the downstream portfolio for all horizons. Specifically, in the context of social risks materiality assessment, the Bank examines the “inside-out” negative impact of social factors through the UNEP FI tool methodology. The Bank, in order to enhance the relationship between specific activities/ NACE codes with negative impact on social, performed an analysis based on additional information from the UNEP FI Portfolio Impact Analysis Tool. The Sector-Impact Map portrays the positive and negative associations between industries / sectors / activities on the three pillars of sustainable development (and therefore they are closely aligned with the UN Sustainable Development Goals (SDGs): social, socio-economic and natural environment through a holistic set of Impact Areas (such as Integrity & Security of Person, healthy economies and biodiversity & healthy ecosystems) and Impact Topics (such as soil, air, waterbodies, etc.) of the Impact Radar. The mapping builds on resources such as the Environmental Health and Safety Guidelines of the International Finance Corporation, UNEP FI’s Risk Briefings, as well as thematic resources such as ENCORE. The mapping has also benefited from the reviews of several specialist organizations.

Based on this mapping, the Bank assessed the negative impact of the social and socio-economic pillars of sustainable development, taking into consideration the relevant impact topics. This negative impact considers the following two dimensions a. whether a sector/activity is associated with an impact area and b. whether the sector is “key sector” for the impact area (which is considered more direct than the abovementioned dimension).

Operational Risk

In addition to portfolio-related risks, the Bank also addresses operational risks linked to social factors. These include risks associated with working conditions, wages, privacy, and social inclusion. The Bank has performed a mapping of social topics with the risk types identified within the Operational Risk Taxonomy framework and the corresponding inherent risk assessment outcomes derived from the RCSA. Social topics that are assessed as having a High or Medium High inherent risk are deemed material, while qualitative overlays have been adopted as applicable. In this context the following social topics are considered material in the short-medium and long-term: own workforce: training & skills development and for consumers and end users: privacy, access to (quality) information, responsible marketing practices. The inherent risk assessment is conducted without accounting for existing controls, focusing on short-term risks while assuming that the conclusions remain relevant for medium- and long-term horizons.

The materiality assessment identifies specific social topics as requiring greater attention, particularly in areas such as training and skills development, privacy, and social inclusion. These risks are managed through robust processes, including regulatory compliance measures, operational safeguards, and strategic planning.

Activities for Mitigating Social Risk

The Bank offers a range of specialized loan programs designed to address critical societal needs while mitigating social risks. These initiatives aim to empower individuals, foster equitable opportunities, and support sustainable development:

- Young Housing Program – “My Home”: A state-sponsored housing program providing young individuals (aged 25-39) with affordable home loans to purchase their first residence.
- Consumer Loan for Educational Needs: Personal loans tailored to meet educational expenses across all levels of education.
- Alpha Anaptixi: Medium-term working capital loans for small businesses to meet operational and productive needs.
- Social Benefit Prepaid Visa: A prepaid card solution for the disbursement of regular government allowances.

Through these carefully designed financial solutions, the Bank demonstrates its commitment to reducing social vulnerabilities, fostering inclusion, and supporting a sustainable future for all.

Furthermore, the Bank has established the following dedicated processes to identify and mitigate risks associated with social factors during credit origination with a specific implementation schedule in case of High-risk outcome, Transaction Assessment & Due-Diligence process and Reputation Risk Assessment. Those processes have been developed in alignment with international standards and enable the Bank to mitigate social risks within its portfolio.

Additional details related to the identification and management of Social and Employee, Human Rights, Anti – Corruption & Bribery matters can be found in the respective sections, as well as the Responsible Investments and Financing of the Sustainability Statement section of the Alpha Services & Holdings Annual Report (Group-Holdco-31122024-ENG060324Disclaimer.pdf)

11.2.3 Governance risk

Risk Management

Governance risk refers to potential detrimental financial impacts on the financial institution due to existing or anticipated influences of governance factors on its counterparties or invested assets. Governance also has a substantial role in ensuring the incorporation of environmental and social aspects by a respective counterparty. Acknowledging the possible implications of climate and environmental disruptions, along with their associated physical and transition risks, is generally considered as a sign of effective governance. Conversely, overlooking these potential impacts during a counterparty's strategic planning could introduce further governance risks. From an inherent risk perspective, Governance risk is currently considered to be material given the size of Non-Financial Corporate Loans portfolio and impact of this risk type. The Bank has established processes to identify and mitigate risks related to Governance factors, therefore the associated residual risks are considered immaterial.

Recognizing significant variations in the management of governance-related topics across different companies, the Bank is implementing a bottom-up process at the obligor level, utilizing the ESG Obligor Assessment questionnaires.

Some indicative governance risk related aspects/ dimensions that are part of the ESG Obligor Assessment questionnaires are presented below:

- Aspects of accountability, reporting, and transparency.
- Business ethics and regulatory compliance, including anti-corruption measures.
- Issues concerning Diversity strategy and group’s composition.
- Remuneration practices and performance evaluation.
- ESG Governance matters, specifically focusing on the engagement of the management body in supervising environmental and social issues.
- Strategy & Risk Management.
- Collective Knowledge, emphasizing on the development and enhancement of environmental and socioeconomic effects.

Regarding the ESG obligor scoring process, a series of scorecards has been developed, based on the industry the obligor belongs to. The main inputs of the scorecards have been categorized to three groups, namely environmental (E), social (S) and governance (G). A series of questions/variables that pertain to these groups have been collected (e.g. from sustainability reports) and have been used to train the scorecards, under the condition that E, S and G analytically derived scores converge to the target scores (externally sourced from LSEG Data & Analytics, formerly Refinitiv). Regarding the Governance component, the questions have been grouped to ten (10) areas; Composition/Diversity, Regulatory Compliance, Business Ethics, Strategy and Risk Management, Transparency, Stakeholder Engagement, Roles & Responsibilities, Remuneration, Performance Evaluation and Collective Knowledge, all of which are qualitative, apart from Composition/Diversity which is quantitative. The model weights have been optimized at the area level (such that the condition above has been met) and are allocated down to final metric weights. The model produces distinctive E, S and G (numerical) scores, which are aggregated to ESG scores, according to a weighting combination that depends on the industry of the obligor. The scores are also mapped, via a rating scale, to twelve (12) ratings (between aaa and c-) and further to three (3) grades, according to a RAG (Red-Amber-Green) classification.

Governance Risk Materiality Assessment

To evaluate governance risks, the Bank maps governance topics to compliance risks using its Compliance Risk Assessment framework. This process incorporates an inherent risk assessment that considers the impact (potential effect on the Bank's objectives) and the likelihood (possibility of the risk manifesting over a specific timeframe). The inherent risk assessment is conducted without accounting for existing controls, focusing on short-term risks while assuming that the conclusions remain relevant for medium- and long-term horizons.

Governance topics are classified as material if they pose a high or medium-high inherent risk. In this context Corruption and Bribery governance topic is considered material in the short-, medium- and long-term.

Reputational Risk Assessment

The Group Reputational Risk Management Framework outlines the governance structure and approach for identifying, assessing, mitigating, avoiding, managing, and reporting the primary sources of reputational risk within the Group. It includes a comprehensive Reputational Risk Questionnaire, designed to assess obligors involved in potentially controversial activities. This questionnaire covers key factors such as corruption, ethical considerations, and anti-competitive behavior, ensuring the proactive identification of risks that could adversely affect the Bank's reputation. By incorporating these elements, the framework ensures robust monitoring and management of reputational risks.

Conflict of Interest

The Bank has incorporated in its Vendor Risk Assessment Questionnaire questions regarding ESG risk drivers that might affect vendors' operations and consequently the services offered to the Bank. Specifically in the Questionnaire, the conflict of interest of counterparties is addressed and evaluates whether the Vendor has a documented Conflict of Interest policy, a history of identified conflict incidents, and any professional relationships between the Vendor's employees (or their close family members) and the Alpha Bank Group.

Know-Your-Customer Policies & Processes

The Bank implements a robust Know Your Customer (KYC) framework in line with applicable laws, regulations and international best practices. In the context of the KYC process, Customer Due Diligence (CDD) measures are taken on a risk-based approach. Based on the risk classification of the Customer, specific management measures are taken and the required due diligence (standard, enhanced or simplified) is applied.

CDD measures, both at the inception and during the course of the business relationship, include the identification and verification of the Customer's and Beneficial Owner's identity, based on documents, data or information, from reliable and independent sources.

CDD measures also includes the creation of a financial/transactional profile of the Bank's Customers, which contains information such as the purpose for which the account is opened, or a business relationship is entered into; the intended transactional activity of the account, the types of transactions that may be performed, the expected source of funds to be credited to the account, the expected destination of outgoing remittances or payments; the size and sources of the Customer's assets and income and the description of the Customer's professional or business activity.

Furthermore, important role in the CDD measures framework, plays the scrutiny of any transaction or activity, which by its nature or the way in which it is carried out, or the information concerning the person, or the capacity of the person involved in the transaction, can be linked to ML/TF especially if the transaction is complex or of unusually high value, or without an obvious economic or clear legal reason.

The exercise of continuous monitoring, with regards to the business relationship, throughout the duration of the business relationship is crucial in order to ensure that the transactions and activities carried out are consistent with the Customer's profile.

Moreover, the Bank implements additional appropriate measures, including not allowing to complete the transaction and refusing services or activities, if the Customer's identification and verification requirements are not met, due diligence measures are lacking, or ongoing reporting to the local FIU for the Customer.

It is mentioned that the Bank, does not proceed with transactions, provide services, conduct activities and promptly notifies the relevant Authorities, if the Customer's name appears on sanction lists issued by the EU, UN or OFAC.

Finally, all Customers are obliged to complete KYC Questionnaire which is an integral part of KYC process of the Bank.

Anti-Money Laundering / Terrorist Financing (AML/TF) Policies & Processes

The Bank is committed to comply with the AML/CFT regulatory and legislative framework across its operations and to cooperate closely with supervisory authorities to detect, prevent, and eliminate any activities, practices, or behaviors that may result in relevant violations. It continuously monitors its compliance performance and implements corrective measures as needed, in line with Greek, European, and international standards. The Bank's AML/CFT Policy outlines robust internal controls, comprehensive Customer Due Diligence (CDD) measures, and ongoing transaction monitoring systems to identify and mitigate potential risks. Regular employee training programs and independent audits reinforce the effectiveness of these controls.

Furthermore, the Bank is required to have a thorough understanding of the risks related to Money Laundering (ML) and Terrorist Financing (TF) employing a risk-based approach to AML/CFT compliance, ensuring heightened scrutiny of high-risk customers and transactions. For this reason, the AML/CFT Policy describes the risk assessment process that consists of two interrelated steps:

a. Identifying ML/TF risk factors, and
b. Conducting an ML/TF risk assessment.

When assessing the residual ML/TF risk linked to the Bank's operations, business relationships, and occasional transactions, the Bank evaluates both inherent risks and the effectiveness of mitigating measures. The Bank also ensures that the risk assessment reflects the measures implemented to assess AML/CFT risks related to business relationships or occasional transactions, considering the risk appetite of the Bank and each Company within the Group specifying the unacceptable risk category customers as described in the AML/CFT Policy.

Additionally, AML/CFT Policy defines explicitly the role and the responsibilities of the AML/CFT Compliance Officer according to the latest legislation and the role and responsibilities of the Board of Directors and the Audit Committee in the AML/CFT framework.

Finally, compliance with sanctions or restrictive measures against countries, persons, or entities according to the regulations issued by the EU, the UN Security Council and the national Competent Authorities is also required. The Bank, as described in AML/CFT Policy, monitors the legal and regulatory requirements, proceeds to the screening of customers, transactions of payments and services and products against sanctions lists and implements the necessary measures where appropriate.

Next Steps

In the context of the incorporation of the Corporate Sustainability Reporting Directive (CSRD), counterparties are required to publicly disclose aspects of their internal policies, as specified in the European Sustainability Reporting Standards (ESRS), developed by the European Financial Reporting Advisory Group (EFRAG). This gives the Bank new dimensions to consider in the governance risk assessment practices affecting the counterparties.

Additional details related to governance aspects can be found in the respective section of the Non – Financial report section of the Alpha Services & Holdings Annual Report (Group-Holdco-31122024-ENG060324Disclaimer.pdf)).

11.3 Quantitative Disclosures on Climate change transition, Physical Risks and Mitigating actions

11.3.1 Banking book–Climate Change transition risk:Credit quality of exposures by sector, emissions and residual maturity

1. Overview

The template includes Group exposures towards non-financial corporates, including loans and advances, debt securities and equity instruments, classified in the accounting portfolios in the banking book, by sector of economic activities using NACE codes based on the principal activity of the counterparty. The template excludes financial assets held for trading or assets held for sale.

2. Approach, applicable standards and key assumptions

Exposures towards sectors that highly contribute to climate change

It is noted that the Bank utilized a multi-factor approach for defining ESG sensitive perimeter when conducting the materiality assessment , which is also applied within the ICAAP framework and reporting. This approach involves considering several factors, the definition of CPRS perimeter (Climate Policy Relevant Sectors), sectors sensitive to transition risk according to Net Zero Banking Alliance (NZBA) and Long-Term Strategy for Greece for 2050 (LTS), as well as emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the short-term disorderly transition scenario that ECB published as part of the 2022 ECB climate stress test exercise. However, the exposures included by the Bank in Template 1 under ‘Exposures towards sectors that highly contribute to climate change’, exceed those in the ESG sensitive perimeter due to the particular design of the Template i.e., the particular NACE code breakdown presented therein. (e.g., for NACE sector G, only G45 and specific subsectors of G46 & G47 fall under CPRS, whereas the majority of G46 & G47 are not ESG sensitive).

Exposures towards companies excluded from EU Paris-aligned Benchmarks

The majority of the Bank's counterparties do not yet disclose information on their corresponding revenue split per sector of economic activity. To overcome this limitation, the NACE code of the counterparty's principal activity has been used to identify exposures towards companies excluded from EU Paris-aligned Benchmarks. The following NACE codes have been selected for this purpose: 0510, 0520, 0610, 0620, 1920, 3511, 3521, 3522, 3523, 4671, 4730, 1910, 0910, 4950. Regarding NACE sector D35, the exposures towards Renewable Energy Sources have not been considered in PAB exclusions. In light of EBA's consultation paper regarding amendments to the Implementing Regulation on Pillar III disclosures and the no-action letter advising national competent authorities not to prioritize the disclosure of certain ESG disclosure templates (notably EU 6 to EU 10, and specific columns in Templates 1 and 4), column C of ESG Template 1, which pertains to environmentally sustainable assets, has not been populated.

Non-performing status for exposures is fully aligned with the new Definition of Default regulatory guidelines and Stage 3 classification according to the IFRS9 accounting standard. Stage 2 exposures have been defined according to the IFRS9 accounting standard and exclude POCI loans.

Exposures have been allocated to maturity buckets according to the remaining maturity of the relevant financial instrument. The contractual maturity has been used for term loans whereas the IFRS9 behavioral maturity has been used for revolving loans, open loans and credit cards. A perpetual maturity has been applied for equities (set to 21yrs for weighting calculation purposes). Average maturity has been calculated by weighing the maturity of each exposure by the gross carrying amount of exposures.

Financed Emissions

The PCAF Standard acknowledges that limited data availability is often the main challenge when calculating financed emissions. To overcome this challenge and to promote transparency as the main driving force, the Standard provides a variety of options in order to estimate financed emissions, depending on data availability. Each option is asset class-specific and corresponds to a "data quality score" (1=highest data quality; score 5=lowest data quality).

Adhering to the PCAF Standard's guidance, obligors' actual emissions and activity data were prioritized in order to calculate financed emissions. In cases where actual emissions were not publicly available / easily retrievable, proxies have been developed as a means to estimate emissions, resulting in lower data quality. These proxies were calculated using activity proxies rather than proxies based on financial data.

Whereas the latter was not possible, obligors' financial data (specifically the turnover or revenue) have been used as a proxy to estimate the financed emissions using appropriate emission factors based on the economic activity of the company. The most commonly used economic-based emission factors are derived from an environmentally extended input-output model (EEIO) and provide emission factors for all scopes of obligor's emissions, based on the sector in which it operates.

Other Financial Corporations (Sector K)

Exposures towards both Non-Financial Corporations and Other Financial Corporations in Sector K are included in the perimeter according to the latest (30.06.2025) FinRep classification and the instructions of the regulator (Q&A ID: 2022_6600).

3. Limitations

In calculating Financed Emissions, the Bank is utilizing proxies to address the data limitations associated with actual emissions. Further details are provided in the respective sections.

4. Plans for enhanced disclosure

The Bank intends to capture information with respect to the revenue split per sector of economic activity, in addition to applying relevant data from PAB Administrators when such data becomes available, for the more accurate identification of PAB exclusions according to Art. 12.1, points (d) to (g) and Art. 12.2 of Commission Regulation (EU) 2020/1818.

Template 38a: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2025

(Amounts in millions of Euro)

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 years <= 10 years	> 10 years <= 20 years	> 20 years	Average weighted maturity
1	**Exposures towards sectors that highly contribute to climate change***	**22,782**	**2,288**	**0**	**1,529**	**367**	**-181**	**-27**	**-141**	**15,005,963**	**8,939,829**	**21%**	**15,153**	**3,695**	**2,948**	**985**	**6**
2	A - Agriculture, forestry and fishing	178	0	0	13	6	-1	0	-1	179,750	38,561	0%	164	10	2	3	3
3	B - Mining and quarrying	33	0	0	5	4	-2	0	-1	96,650	29,960	0%	29	2	1	1	4
4	*B.05 - Mining of coal and lignite*	0	0	0	0	0	0	0	0	299	99	0%	0	0	0	0	1
5	*B.06 - Extraction of crude petroleum and natural gas*	0	0	0	0	0	0	0	0	7	3	0%	0	0	0	0	1
6	*B.07 - Mining of metal ores*	10	0	0	0	0	0	0	0	7,734	515	0%	10	0	0	0	3
7	*B.08 - Other mining and quarrying*	20	0	0	5	3	-1	0	-1	88,062	29,162	0%	17	1	1	1	4
8	*B.09 - Mining support service activities*	2	0	0	0	0	0	0	0	548	181	0%	2	1	0	0	5
9	C - Manufacturing	4,496	746	0	447	123	-62	-5	-55	5,455,174	4,060,161	33%	3,698	666	87	45	3
10	*C.10 - Manufacture of food products*	1,119	0	0	63	35	-16	-1	-14	503,936	431,200	25%	843	261	8	7	3
11	*C.11 - Manufacture of beverages*	173	0	0	8	2	-1	0	0	31,609	26,920	31%	139	31	1	2	2

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
12	*C,12 - Manufacture of tobacco products*	18	0	0	0	0	0	0	0	15,127	12,852	0%	17	0	0	0	2
13	*C,13 - Manufacture of textiles*	48	0	0	7	5	-3	0	-3	3,577	2,659	0%	35	9	3	2	5
14	*C,14 - Manufacture of wearing apparel*	43	0	0	6	13	-8	0	-7	4,240	3,510	20%	35	2	1	4	5
15	*C.15 - Manufacture of leather and related products*	10	0	0	4	1	0	0	0	776	576	0%	8	1	0	1	6
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	16	0	0	4	4	-3	0	-3	1,846	1,364	0%	11	1	1	4	8
17	*C.17 - Manufacture of pulp, paper and paperboard*	146	0	0	7	7	-5	0	-5	36,528	18,201	0%	116	20	8	2	3
18	*C.18 - Printing and service activities related to printing*	22	0	0	5	4	-1	0	-1	2,308	1,699	0%	19	1	1	0	4
19	*C.19 - Manufacture of coke oven products*	746	746	0	220	0	-1	0	0	3,422,337	2,875,911	38%	745	0	0	0	2
20	*C.20 - Production of chemicals*	193	0	0	7	7	-3	0	-2	78,969	37,792	6%	150	6	36	1	5

Sector/subsector		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
21	*C.21 - Manufacture of pharmaceutical preparations*	183	0	0	9	1	-1	0	0	11,244	7,107	8%	131	49	4	0	4
22	*C.22 - Manufacture of rubber products*	189	0	0	3	16	-5	0	-5	53,754	46,280	4%	176	10	1	1	2
23	*C.23 - Manufacture of other non-metallic mineral products*	222	0	0	20	6	-2	0	-2	596,468	107,600	78%	208	6	2	7	3
24	*C.24 - Manufacture of basic metals*	418	0	0	20	2	-1	0	-1	336,612	156,098	47%	360	56	1	1	4
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	176	0	0	29	10	-6	-1	-5	48,451	42,513	4%	139	26	5	6	4
26	*C.26 - Manufacture of computer, electronic and optical products*	69	0	0	0	1	0	0	0	4,666	4,037	36%	62	7	1	0	3
27	*C.27 - Manufacture of electrical equipment*	517	0	0	3	1	-1	0	-1	249,066	232,777	69%	345	170	2	0	3
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	83	0	0	20	2	-1	0	-1	13,133	12,076	63%	77	3	2	1	3
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	15	0	0	1	0	0	0	0	33,515	33,010	44%	13	1	0	1	3

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
30	*C.30 - Manufacture of other transport equipment*	23	0	0	0	1	0	0	0	1,473	1,302	0%	21	0	0	1	4
31	*C.31 - Manufacture of furniture*	32	0	0	6	2	-1	0	-1	2,734	2,307	0%	21	3	6	2	7
32	*C.32 - Other manufacturing*	22	0	0	4	2	-1	0	-1	1,706	1,428	0%	17	2	1	1	5
33	*C.33 - Repair and installation of machinery and equipment*	12	0	0	1	3	-2	0	-2	1,099	942	0%	9	0	1	1	5
34	D - Electricity, gas, steam and air conditioning supply	3,513	1,128	0	28	1	-3	0	0	1,686,914	794,394	59%	2,303	570	615	25	6
35	*D35.1 - Electric power generation, transmission and distribution*	3,510	1,128	0	27	0	-2	0	0	1,683,092	793,924	59%	2,302	569	615	25	6
36	*D35.11 - Production of electricity*	2,364	1,128	0	26	0	-1	0	0	1,020,899	359,574	43%	1,450	326	588	0	6
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	1	1	0	0	0	0	0	0	526	65	0%	1	0	0	0	4
38	*D35.3 - Steam and air conditioning supply*	1	0	0	0	0	0	0	0	3,296	405	0%	1	1	0	0	6
39	E - Water supply; sewerage, waste management and remediation activities	71	0	0	1	0	0	0	0	44,126	22,187	42%	53	4	13	0	4

Sector/subsector		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
40	F - Construction	901	0	0	165	37	-22	-1	-20	57,117	46,991	6%	567	140	170	25	6
41	*F.41 - Construction of buildings*	448	0	0	106	27	-16	-1	-15	10,629	8,569	0%	328	63	54	3	5
42	*F.42 - Civil engineering*	298	0	0	51	4	-2	0	-2	34,398	28,541	13%	123	46	111	18	8
43	*F.43 - Specialised construction activities*	156	0	0	8	6	-4	0	-3	12,090	9,881	0%	116	31	6	3	4
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,290	322	0	357	127	-56	-8	-44	1,432,039	1,159,276	6%	2,642	327	236	86	4
45	H - Transportation and storage	5,065	92	0	39	23	-5	0	-4	5,878,700	2,675,760	24%	2,676	690	1,067	631	8
46	*H.49 - Land transport and transport via pipelines*	172	92	0	18	1	-1	0	-1	28,461	12,568	62%	46	86	37	3	8
47	*H.50 - Water transport*	2,947	0	0	1	20	-3	0	-3	3,608,799	518,207	0%	2,391	554	1	0	4
48	*H.51 - Air transport*	226	0	0	0	0	0	0	0	2,042,104	2,017,442	90%	2	0	224	0	13
49	*H.52 - Warehousing and support activities for transportation*	1,696	0	0	17	1	-1	0	0	186,939	115,393	50%	220	49	800	628	16
50	*H.53 - Postal and courier activities*	24	0	0	3	0	0	0	0	12,397	12,150	92%	18	0	6	0	7
51	I - Accommodation and food service activities	3,210	0	0	225	21	-11	-4	-5	129,384	96,293	0%	1,661	897	616	36	6
52	L - Real estate activities	2,025	0	0	250	26	-19	-7	-11	46,109	16,246	11%	1,361	391	140	134	6

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
53	**Exposures towards sectors other than those that highly contribute to climate change***	**4,285**	**0**	**0**	**130**	**27**	**-53**	**-2**	**-13**				**3,074**	**702**	**325**	**184**	**5**
54	K - Financial and insurance activities	2,073	0	0	2	0	-1	0	0				1,254	420	243	156	7
55	Exposures to other sectors (NACE codes J, M - U)	2,212	0	0	129	27	-52	-2	-13				1,821	282	82	27	4
56	TOTAL	**27,067**	**2,288**	**0**	**1,660**	**394**	**-234**	**-29**	**-154**	**15,005,963**	**8,939,829**	**24%**	**18,227**	**4,398**	**3,273**	**1,169**	**6**

* In accordance with the Commission delegated regulation EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks

-Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006

Template 38b: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 31.12.2024

(Amounts in millions of Euro)

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions						
1	**Exposures towards sectors that highly contribute to climate change***	21,898	2,036	1,247	1,342	402	-197	-27	-158	18,839,449	12,376,603	21%	14,417	3,647	2,439	1,396	6
2	A - Agriculture, forestry and fishing	251	0	0	21	6	-2	0	-1	418,034	88,180	0%	243	4	2	3	2
3	B - Mining and quarrying	30	0	0	6	4	-1	0	-1	11,406	5,246	0%	26	2	1	1	4
4	*B.05 - Mining of coal and lignite*	0	0	0	0	0	0	0	0	297	98	0%	0	0	0	0	1
5	*B.06 - Extraction of crude petroleum and natural gas*	0	0	0	0	0	0	0	0	7	3	0%	0	0	0	0	1
6	*B.07 - Mining of metal ores*	10	0	0.00073543	0	0	0	0	0	5,323	3,231	0%	10	0	0	0	4
7	*B.08 - Other mining and quarrying*	17	0	0.01002427	5	3	-1	0	-1	4,908	1,625	0%	14	1	1	1	5
8	*B.09 - Mining support service activities*	3	0	0	0	0	0	0	0	871	289	0%	2	1	0	0	5
9	C - Manufacturing	4,119	505	109	205	157	-83	-5	-74	10,613,630	9,158,005	37%	3,064	908	93	54	4
10	*C.10 - Manufacture of food products*	1,040	0	0	63	43	-19	-1	-17	476,895	411,960	23%	710	314	7	9	4

Sector/subsector		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
11	*C.11 - Manufacture of beverages*	175	0	0	7	2	-1	0	0	28,507	24,312	22%	156	16	1	2	2
12	*C.12 - Manufacture of tobacco products*	20	0	0	0	0	0	0	0	4,158	3,490	0%	19	1	0	0	1
13	*C.13 - Manufacture of textiles*	53	0	2	6	8	-5	0	-5	12,936	9,374	24%	40	7	4	2	5
14	*C.14 - Manufacture of wearing apparel*	48	0	0	7	18	-9	0	-8	4,126	3,469	17%	40	2	1	5	5
15	*C.15 - Manufacture of leather and related products*	11	0	0	2	2	-1	0	-1	712	528	0%	8	1	1	1	6
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	19	0	0	4	8	-5	0	-5	1,867	1,259	0%	14	0	1	4	8
17	*C.17 - Manufacture of pulp, paper and paperboard*	134	0	0	8	8	-6	0	-6	29,715	14,806	0%	104	20	8	3	4
18	*C.18 - Printing and service activities related to printing*	24	0	0	2	3	-1	0	-1	2,533	1,866	0%	21	2	1	1	4

Sector/subsector		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
19	*C.19 - Manufacture of coke oven products*	510	505	5	0	0	0	0	0	8,475,433	7,846,178	96%	467	43	0	0	3
20	*C.20 - Production of chemicals*	203	0	6	7	8	-4	0	-4	77,468	39,763	9%	152	14	36	1	5
21	*C.21 - Manufacture of pharmaceutical preparations*	173	0	5.22176812	0	1	-1	0	0	10,857	7,159	5%	134	33	5	0	3
22	*C.22 - Manufacture of rubber products*	180	0	1	7	18	-7	0	-7	35,439	28,158	0%	168	9	1	2	3
23	*C.23 - Manufacture of other non-metallic mineral products*	220	0	8	22	8	-5	-1	-4	584,498	98,061	9%	205	5	4	7	4
24	*C.24 - Manufacture of basic metals*	392	0	12	1	2	-1	0	-1	334,062	162,372	50%	187	203	1	1	5
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	162	0	6	26	6	-3	-1	-2	26,761	22,372	0%	115	34	5	8	5
26	*C.26 - Manufacture of computer, electronic and optical products*	72	0	0.21113614	1	0	0	0	0	6,792	6,173	54%	55	16	1	0	3
27	*C.27 - Manufacture of electrical equipment*	430	0	56	3	1	-1	0	-1	204,588	186,513	70%	268	160	2	0	4

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	86	0	0.88404506	21	9	-6	0	-6	36,117	33,676	66%	79	3	3	2	4
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	73	0	7	1	0	0	0	0	253,069	250,466	67%	56	17	0	1	2
30	*C.30 - Manufacture of other transport equipment*	25	0	0	4	1	0	0	0	1,719	1,518	0%	19	5	0	1	4
31	*C.31 - Manufacture of furniture*	35	0	0	5	4	-3	0	-3	2,502	2,109	0%	23	3	6	2	7
32	*C.32 - Other manufacturing*	22	0	0	4	3	-2	0	-2	1,621	1,349	0%	16	1	2	2	7
33	*C.33 - Repair and installation of machinery and equipment*	13	0	0	2	4	-3	0	-3	1,255	1,074	0%	10	0	2	1	5
34	D - Electricity, gas, steam and air conditioning supply	3,307	1,066	987	16	1	-3	0	0	1,830,813	886,440	61%	2,192	551	519	45	6
35	*D35.1 - Electric power generation, transmission and distribution*	3,303	1,063	987	16	0	-2	0	0	1,828,280	886,128	88%	2,189	550	519	45	6
36	*D35.11 - Production of electricity*	2,270	1,063	923	14	0	-1	0	0	1,155,648	456,200	47%	1,417	331	498	24	6
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	3	3	0.00000109	0	0	0	0	0	869	107	0%	3	0	0	0	2

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
38	*D35.3 - Steam and air conditioning supply*	1	0	0	0	0	0	0	0	1,664	205	0%	0	1	0	0	7
39	E - Water supply; sewerage, waste management and remediation activities	70	0	12	3	1	0	0	0	53,720	19,906	44%	53	4	14	0	5
40	F - Construction	848	0	33	179	31	-15	-1	-13	187,948	139,171	11%	532	117	173	26	6
41	*F.41 - Construction of buildings*	399	0	4.76419569	111	12	-5	-1	-5	11,875	9,333	4%	286	58	52	3	6
42	*F.42 - Civil engineering*	314	0	20	53	13	-7	0	-6	73,482	61,357	5%	132	49	115	18	8
43	*F.43 - Specialised construction activities*	135	0	8	14	6	-3	0	-3	102,591	68,481	48%	114	10	6	5	4
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,177	376	19	254	140	-66	-9	-54	1,263,305	1,109,838	7%	2,506	336	238	98	5
45	H - Transportation and storage	5,178	89	17	52	25	-7	-1	-6	4,189,313	858,490	11%	3,193	445	484	1,057	8
46	*H.49 - Land transport and transport via pipelines*	169	89	0	10	1	-1	0	0	177,831	123,183	62%	44	81	41	3	9
47	*H.50 - Water transport*	3,132	0	0	20	24	-6	0	-5	3,689,892	530,016	0%	2,850	281	1	0	4
48	*H.51 - Air transport*	200	0	10.50307773	0	0	0	0	0	47,826	38,715	10%	7	0	193	0	13
49	*H.52 - Warehousing and support activities for transportation*	1,654	0	1	20	1	-1	0	0	263,579	156,574	25%	291	67	243	1,054	16

Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
50	*H.53 - Postal and courier activities*	23	0	5.80280745	3	0	0	0	0	10,185	10,002	94%	1	16	6	0	8
51	I - Accommodation and food service activities	3,067	0	53.05883859	325	23	-12	-4	-6	141,051	78,965	0%	1,552	749	726	40	7
52	L - Real estate activities	1,850	0	16	282	15	-8	-7	-1	130,229	32,362	8%	1,058	530	190	72	6
53	**Exposures towards sectors other than those that highly contribute to climate change***	4,087	0	173	120	25	-56	-3	-11				2,780	814	301	191	2
54	K - Financial and insurance activities	1,927	0	151.7840626	6	0	-1	0	0				1,101	458	206	162	11
55	Exposures to other sectors (NACE codes J, M - U)	2,160	0	21	115	25	-55	-3	-11				1,679	356	95	29	4
56	TOTAL	25,985	2,036	1,420	1,462	427	-253	-30	-169	18,839,449	12,376,603	21%	17,198	4,460	2,740	1,587	5

11.3.2 Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

1. Overview

The template shows the gross carrying amount of loans collateralised with commercial and residential immovable property and of repossessed real estate collaterals, including information on the level of energy efficiency of the collaterals.

Columns that show the EP score of the collateral include exposures based on the specific energy consumption of the collateral (in kWh/m²) as indicated in the collateral EPC label or estimated by the Bank in the absence of an EPC label. Columns that show collateral EPC labels include exposures for those collaterals where the EPC label is actual, not estimated. Exposures for which the Bank does not have the actual EPC label of the collateral are included under Column 'Without EPC label of collateral'.

It is noted that the perimeter of Template 2 has been revised and includes collaterals both eligible and non-eligible to receive an EPC label according to the EU Energy Performance of Buildings Directive. Collaterals non-eligible to receive an EPC label have been incorporated in column O of the template (Without EPC label of collateral) and respectively, column P (Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated) has been updated. This revision aligns the perimeter of Template 2 with the perimeter of Template 5.

2. Approach, applicable standards and key assumptions

Estimates of the level of energy efficiency have been performed relying on data and information compiled for the purposes of the Regulation on the Energy Performance of Buildings (KENAK). Energy consumption was calculated using a weighting of the results from two methodologies, the first relying on calculated EPCs for the Bank's property collaterals and associated information per property (e.g., year of construction, property type, postal code etc.) and the second on KENAK recorded data of average energy consumption for residential and commercial buildings per climate zone, derived from actual reported EPCs. The extent to which this data has been estimated and not based on EPC labels is indicated in rows 5 and 10 for the EU Area and non-EU Area, respectively.

The EU / non-EU area distinction has been performed according to the country of collateral location. Additionally, the population of the collateralized by commercial / residential immovable property' rows for exposures that are covered by both CRE and RRE properties has been conducted through implementing an allocation algorithm with relevant collateral prioritization.

For the collateralized loans with eligible property collateral for EPC, the total exposure of the loan has been reported in the template as a result of the respective guidelines provided by the regulator. In all submissions, the exposures collateralised by other collateral types of non-EPC eligible have been excluded.

3. Limitations

The Energy Performance of Buildings Directive introduced the Energy performance certificates (EPC) as instruments for improving the energy performance of buildings. Availability of Energy Performance Certificates is a requirement when conducting property transactions within the EU since the Energy Performance of Buildings Directive (2010/31/EU) and the Energy Efficiency Directive (2012/27/EU) came into force. However the Bank currently has limited data on actual EPCs since i) the Bank does not always have access to this information, especially in cases where other entities are involved in the actual transaction ii) no EPCs were issued for property collaterals in transactions that were concluded before the relevant EU Directive came into force iii) there is no central registry available in the country that collects and consolidates information on EPCs, which could be accessed by financial institutions to retrieve data on a large scale.

4. Plans for enhanced disclosure

The Bank to the extent possible has started collecting EPC rating certificates from its clients, in order to monitor the energy performance class of its real estate secured exposures. In 2024, the Bank has integrated information on the Energy Performance Certificate (EPC) of relevant real estate properties within its credit decision making process as well as each collateral valuation subject to EPC eligibility. In addition, the Bank participates actively in the collective initiative organized by the HBA and the Ministry of Environment & Energy, which aims at the provision of access for the financial institutions to an EPC registry that will facilitate the collection of actual EPCs and increase the rate of EPC over the total real estate pool.

ALPHA BANK

Template 39a: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 30.06.2025

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Counterparty sector	**Total gross carrying amount amount (in MEUR)**															
			Level of energy efficiency (EP score in kWh/m² of collateral)						**Level of energy efficiency (EPC label of collateral)**							**Without EPC label of collateral**	
			0; <= 100	**> 100; <= 200**	**> 200; <= 300**	**> 300; <= 400**	**> 400; <= 500**	**> 500**	**A**	**B**	**C**	**D**	**E**	**F**	**G**		**Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated**
1	**Total EU area**	13,340	769	4,073	2,386	2,114	396	894	305	108	177	129	67	41	83	12,430	78%
2	Of which Loans collateralised by commercial immovable property	6,483	83	568	606	1,790	332	800	114	66	130	56	17	2	9	6,088	62%
3	Of which Loans collateralised by residential immovable property	6,573	685	3,418	1,712	298	50	82	190	43	45	63	40	31	61	6,101	95%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	285	1	87	68	26	14	12	0	0	2	10	10	9	13	240	68%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	9,721	579	3,715	2,207	2,023	342	855								9,721	100%
6	**Total non-EU area**	598	302	163	7	0	0	0	2	102	198	125	36	2	7	126	0%
7	Of which Loans collateralised by commercial immovable property	293	160	61	7	0	0	0	2	68	90	47	14	0	7	65	0%
8	Of which Loans collateralised by residential immovable property	305	142	102	0	0	0	0	0	34	108	78	22	2	0	61	0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Counterparty sector	**Total gross carrying amount amount (in MEUR)**															
			Level of energy efficiency (EP score in kWh/m² of collateral)						**Level of energy efficiency (EPC label of collateral)**							**Without EPC label of collateral**	
			0; <= 100	**> 100; <= 200**	**> 200; <= 300**	**> 300; <= 400**	**> 400; <= 500**	**> 500**	**A**	**B**	**C**	**D**	**E**	**F**	**G**		**Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated**
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	0	0	0	0	0	0	0								0	0%

ALPHA BANK

Template 39b: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Counterparty sector	**Total gross carrying amount amount (in MEUR)**															
			Level of energy efficiency (EP score in kWh/m² of collateral)						**Level of energy efficiency (EPC label of collateral)**							**Without EPC label of collateral**	
			0; <= 100	**> 100; <= 200**	**> 200; <= 300**	**> 300; <= 400**	**> 400; <= 500**	**> 500**	**A**	**B**	**C**	**D**	**E**	**F**	**G**		**Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated**
1	**Total EU area**	10,909	583	4,114	2,417	2,183	418	1,125	268	97	175	127	60	34	75	10,073	99%
2	Of which Loans collateralised by commercial immovable property	4,414	49	546	623	1,850	359	922	97	58	134	65	22	3	9	4,027	98%
3	Of which Loans collateralised by residential immovable property	6,316	533	3,488	1,741	311	48	192	171	39	39	52	31	25	52	5,906	100%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	179	1	80	54	23	11	11	0	0	2	10	8	6	14	140	100%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	10,003	416	3,829	2,229	2,077	370	1,083								10,003	100%
6	**Total non-EU area**	531	201	202	23	0	0	0	2	62	137	115	63	24	23	104	0%
7	Of which Loans collateralised by commercial immovable property	243	95	89	16	0	0	0	0	34	61	39	31	19	16	43	0%
8	Of which Loans collateralised by residential immovable property	288	106	113	7	0	0	0	1	29	76	76	32	5	7	62	0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Counterparty sector	**Total gross carrying amount amount (in MEUR)**															
			Level of energy efficiency (EP score in kWh/m² of collateral)						**Level of energy efficiency (EPC label of collateral)**							**Without EPC label of collateral**	
			0; <= 100	**> 100; <= 200**	**> 200; <= 300**	**> 300; <= 400**	**> 400; <= 500**	**> 500**	**A**	**B**	**C**	**D**	**E**	**F**	**G**		**Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated**
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	0	0	0	0	0	0	0								0	0%

11.3.3 Banking book – Climate change transition risk: Alignment metrics

1. Overview

Alpha Bank became a member of the Net Zero Banking Alliance (NZBA) in May 2023 and committed to align with the NZBA overarching principles of setting and publicly disclosing long-term and intermediate targets to support meeting a net zero by 2050 greenhouse gas emissions goal.

2. Approach, applicable standards and key assumptions

The first round of sector targets across lending and investment portfolios, published in November 2024 and disclosed in the current submission (30.06.2025), represent a key milestone towards the Bank's net zero objective. To establish an emissions baseline, the Bank completed an enhanced measurement of financed emissions for 2022 covering investment and lending across all the sectors it finances based on the GHG emissions of its borrowers or investee companies. As a result, the Bank materially increased the coverage of its financed emissions.

Overall, the Bank includes on-balance sheet exposures in the target-setting exercise. The asset class coverage includes Listed and Unlisted Equity, Corporate Bonds, Business Loans, Commercial Real Estate (CRE), Residential Real Estate (RRE), Motor-Vehicle Loans and Project Finance. To measure its financed emissions, the Bank follows the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials.

The target setting exercise focuses on the financed emissions in the carbon-intensive sectors included in the NZBA Guidelines. The NZBA sectors include agriculture; aluminium; cement; coal; commercial and residential real estate; iron and steel; oil and gas; power generation; and transportation. Alpha Bank prioritised the carbon intensive sectors that are material based on its financed emissions' measurement, outstanding exposure and the contribution to Greece's carbon emissions, the availability of credible sectoral pathways, data quality and availability as well as peer practice.

Based on these criteria, Alpha Bank set targets for the Power Generation, Oil & Gas, Cement, Iron and Steel sectors, which are published in the current submission.

The Bank employs the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE) scenario as its benchmark pathway. In addition, the Bank collected physical activity data for the clients' representing sectors that have set physical intensity targets. Within the financed emissions inventory, the parts of the value chain have been identified and mapped across sectors.

The Bank introduced working sessions with representatives from the business areas that cover the priority sectors used for the first round of net-zero targets to provide training on the target setting approach, scenario modelling and market analysis. As a result, output regarding transition plans and potential financing needs for selected top clients are incorporated into the target setting process.

Overall, the Bank observes differentiated progress across sectors, largely reflecting variations in client data transparency, sectoral decarbonization dynamics, and portfolio composition.

- In the power generation sector, portfolio intensity remains broadly aligned with the IEA NZE2050 pathway, indicating that the portfolio continues to decarbonize in line with the Bank's net zero targets.
- The fossil fuel combustion sector shows a temporary deviation from the IEA trajectory, mainly attributable to increased portfolio exposure following drawdowns on previously approved credit limits, as well as enhanced transparency of client emissions data used in calculations. This evolution was anticipated during the target-setting process.
- In the cement sector, portfolio intensity continues to decline in line with the IEA NZE2050 scenario trajectory. The observed fluctuations are primarily driven by individual client performance and sectoral dynamics, with the overall portfolio remaining on track toward its 2030 target.
- In the iron & steel sector, portfolio intensity remains well below the IEA NZE2050 reference pathway, demonstrating progress consistent with the Bank's decarbonization strategy and client engagement efforts.

The Bank maintains ongoing dialogue with clients in these sectors to support the implementation of credible transition plans and continuously monitors progress through its internal Key Risk Indicators (KRIs). These metrics are recalculated semi-annually and reviewed as part of the broader net-zero monitoring framework. Any temporary deviations are assessed in the context of the Bank's overall strategy and expected to normalize as clients advance in their decarbonization efforts.

3. Limitations

The Bank recognises that there is a significant amount of uncertainty and complexity associated with the net zero transition. Progress towards net zero will depend on the policy landscape, the scale and pace of technological developments, and economic and geopolitical factors. In addition, climate data, scenarios and methodologies continue to evolve, which may require the Bank to evolve its methodology and target setting approach over time.

In this context,

- The targets rely to a great extent on Alpha Bank's key clients meeting their decarbonization commitments. The Bank will continuously engage with its clients on their level of progress and commitments.
- Changes in the operating and macroeconomic environment (for example, prevailing macroeconomic conditions or systemic events) may adversely impact progress towards the target.
- Physical intensity and financed emissions may change due to changes in data and methodology.

4. Plans for enhanced disclosure

The remaining material carbon-intensive sectors will be included in a subsequent round of target-setting in accordance with the NZBA guidelines. Some of the remaining sectors, might be excluded from target setting due to not being material components of Alpha Bank's portfolio, or be treated differently in case of particular specificities relating to technological or other aspects.

Template 40a: Banking book - Climate change transition risk: Alignment metrics 30.06.2025

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	Sector	**NACE Sectors (a minima)**	**Portfolio gross carrying amount (Mn EUR)**	**Alignment metric**	**Year of reference**	**Distance to IEA NZE2050 in % ***	**Target (year of reference + 3 years)**
1	Power	3511	1,692.75	161.70 krCO2e/MWh	2025	0% (1)	154.95 krCO2e/MWh
2	Fossil fuel combustion	1920	660.09	165 Indedexed tCO2e of 2022 = 100 (2)	2025	215%	80.58 Indedexed tCO2e of 2022 = 100
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production	2351	166.73	631.72 kgCO2e / t Cementitious product	2025	36%	609.82 kgCO2e / t Cementitious product
7	Iron and steel, coke, and metal ore production	241	194.94	423.28 kgCO2e / t Steel	2025	0% (3)	1,379.75 kgCO2e / t Steel
8	Chemicals						
9	… potential additions relavant to the business model of the institution						

* PiT distance to 2030 NZE2050 scenario in % (for each metric)

(1) The distance difference for Power Sector between the indicator in column (d) and the IEA scenario projection for 2030 is -13% ahead.

(2) The 65% increase of the Fossil fuel combustion Sector alignment metric is mainly driven by a) greater transparency of client's emission data used for the calculation and b) increased portfolio exposure due to approved credit limits for the sector, prior to 2022 target setting.

(3) The distance difference for Iron and steel, coke, and metal ore production Sector between the indicator in column (d) and the IEA scenario projection for 2030 is -66% ahead.

Template 40b: Banking book - Climate change transition risk: Alignment metrics 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	Sector	**NACE Sectors (a minima)**	**Portfolio gross carrying amount (Mn EUR)**	**Alignment metric**	**Year of reference**	**Distance to IEA NZE2050 in % ***	**Target (year of reference + 3 years)**
1	Power	3511	1,941.46	222.88 kgCO2e/MWh	2022	20%	188.91
2	Fossil fuel combustion	192	289.18	100 Indexed tCO2e of 2022 = 100	2022	30%	90.29
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production	2351	115.76	687.28 kgCO2e / t Cementitious product	2022	48%	648.55
7	Iron and steel, coke, and metal ore production	241	176.92	540 kgCO2e / t Steel	2022	0%	1,559.00
8	Chemicals						
9	… potential additions relavant to the business model of the institution						

* PiT distance to 2030 NZE2050 scenario in % (for each metric)

11.3.4 Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

Information includes exposures towards 2 (two) counterparties that are subsidiaries of companies included in the top 20 most carbon-intensive corporates worldwide, based on data available at the Carbon Majors Database and Reports of the Carbon Disclosure Project, as well as at Climate Accountability Institute.

In light of EBA's consultation paper regarding amendments to the Implementing Regulation on Pillar III disclosures and the no-action letter advising national competent authorities not to prioritize the disclosure of certain ESG disclosure templates (notably EU 6 to EU 10, and specific columns in Templates 1 and 4), column C of ESG Template 4, which pertains to environmentally sustainable assets, has not been populated.

Template 41a : Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 30.06.2025

(Amounts in millions of Euro)

	a	b	c	d	e
	Gross carrying amount (aggregate)	**Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)***	**Of which environmentally sustainable (CCM)**	**Weighted average maturity**	**Number of top 20 polluting firms included**
1	17,02	0,06%	0	0,9	2

*For counterparties among the top 20 carbon emitting companies in the world

Template 41b : Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e
	Gross carrying amount (aggregate)	**Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)***	**Of which environmentally sustainable (CCM)**	**Weighted average maturity**	**Number of top 20 polluting firms included**
1	18.91	0.07%	0	1.3	2

11.3.5 Banking book - Climate change physical risk: Exposures subject to physical risk

1. Overview

The template includes Group exposures in the banking book (including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale), towards non-financial corporates, on loans collateralized with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards.

The column of Gross carrying amount includes all exposures irrespective of sensitivity to physical risk with the subsequent columns including only exposures sensitive to impact from climate change physical events.

2. Approach, applicable standards and key assumptions

The Bank has established a methodology to assess vulnerability to physical risk factors based on sensitivity and exposure analysis (when separately assessed) to derive vulnerability to physical risk factors. The vulnerability assessment is in line with the “ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review”) and the Invest EU methodology (“Technical guidance on the climate proofing of infrastructure in the period 2021-2027”) . It aims to identify potential significant hazards per subsector covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties are used as collateral.

The first ESG materiality assessment performed in March 2023 with reference date 31.12.2022 for physical risk was through the execution of a vulnerability analysis (based on RCP 8.5 W/m2 scenario) for both, NACE sectors at a country level (Greece) and real estate properties at climate zones level, to 16 physical climate risks (8 chronic and 8 acute). The vulnerability assessment identified the potential significant hazards and related risk in alignment with the Invest EU methodology (“Technical guidance on the climate proofing of infrastructure in the period 2021-2027”) and with the “ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review”). The analysis was applied to the Business portfolio per 1-digit NACE sector (22 NACE codes) at a country level (Greece), while for exposures covered by real estate collateral the analysis was applied at a regional level for each of the 4 climatic zones in Greece (as defined by the Greek Ministry Environment & Energy), both for 16 climate risks and for selected (sea level rise, soil & coastal erosion, wildfire, cyclones/hurricane/typhoon, and floods), based on the location of the real estate property.

In 2023, the Bank enhanced the methodology of physical risk assessment and it was further ameliorated in 2024.

Since 2024 and subsequently in 2025, the Bank uses a more granular approach, building upon the initial methodology employed in the initial analysis, incorporating specific enhancements (e.g., in terms of granularity of assessment) depending on the portfolio that is under examination.

The approach examines separately the two main portfolios where physical risk has a profound impact: (1) Business portfolio and (2) Secured by real estate collaterals and REOs in short (2025), medium (2030) and long-term (2050) time horizons.

In order to achieve a more granular and detailed risk level analysis, the Bank has proceeded with:

1. The enhanced development of Sensitivity analysis for physical risks incorporated all physical risks (Heat stress, Water stress, Heatwaves, Droughts & Floods, Changing temperature , Changing wind patterns, Changing precipitation patterns, Sea level rise, Soil and coastal erosion, Soil degradation, Coldwaves/ frost, Wildfire, Cyclone, hurricane, typhoon, storm and tornado, Heavy precipitation (rain, hail, snow/ ice), Landslide and subsidence), at the more granular level of top 20 subsectors (NACE 2 level) in terms of Bank's outstanding gross carrying amount as of 30.06.2025.

2. The development of a location-specific risk analysis for the effects of physical risks on real estate properties using geospatial mapping and local geographical characteristics. This analysis resulted in a vulnerability assessment at NUTS 3 level, at a more granular level in terms of the location of collaterals.

Exposures have been allocated to maturity buckets according to the remaining maturity of the relevant financial instrument. The contractual maturity has been used for term loans whereas the IFRS9 behavioral maturity has been used for revolving loans, open loans and credit cards. A perpetual maturity has been applied for equities (set to 21yrs for weighting calculation purposes). Average maturity has been calculated by weighing the maturity of each exposure by the gross carrying amount of exposures. Additionally, repossessed assets with no defined maturity are included in the “>20 years” band and their maturity is set to 21 years for the calculation of the weighted average maturity.

3. Limitations

Repossessed assets under an 'investment' accounting classification have been excluded from the data reported.

Assessment of physical risk has been performed on NFC exposures, which represent 72,3% of the total Group NFC exposures.

ALPHA BANK

Template 42a: Banking book - Climate change physical risk: Exposures subject to physical risk 30.06.2025

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Variable: Geographical area subject to climate change physical risk - acute and chronic events	Gross carrying amount (Mln EUR)													
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	178	163	10	2	3	3	0	0	177	13	6	-1	0	-1
2	B - Mining and quarrying	33	2	1	0	0	5	0	0	2	0	0	0	0	0
3	C - Manufacturing	4,496	871	277	17	7	4	0	1,172	0	68	36	-16	-1	-15
4	D - Electricity, gas, steam and air conditioning supply	3,513	0	0	0	0	0	0	0	0	0	0	0	0	0
5	E - Water supply; sewerage, waste management and remediation activities	71	53	4	13	0	5	0	0	71	1	0	0	0	0
6	F - Construction	901	109	2	1	0	4	0	112	0	85	13	-9	0	-9
7	G - Wholesale and retail trade; repair of	3,290	0	0	0	0	0	0	0	0	0	0	0	0	0

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Variable: Geographical area subject to climate change physical risk - acute and chronic events	Gross carrying amount (Mln EUR)													
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
	motor vehicles and motorcycles														
8	H - Transportation and storage	5,065	0	0	0	0	1	0	0	0	0	0	0	0	0
9	L - Real estate activities	2,025	59	1	0	0	2	60	0	0	12	0	0	0	0
10	Loans collateralised by residential immovable property	6,878	67	61	135	188	18	216	228	7	70	55	-12	-2	-9
11	Loans collateralised by commercial immovable property	6,775	370	272	194	74	9	280	630	0	66	19	-7	-2	-3
12	Repossessed colalterals	285	0	0	0	28	21	16	12	0	0	0	0	0	0
13	Other relevant sectors (breakdown below where relevant)	0	0	0	0	0	0	0	0	0	0	0	0	0	0

ALPHA BANK

Template 42b: Banking book - Climate change physical risk: Exposures subject to physical risk 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Variable: Geographical area subject to climate change physical risk - acute and chronic events	Gross carrying amount (Mln EUR)													
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	251	242	4	2	3	2	0	0	250	21	6	-2	0	-1
2	B - Mining and quarrying	30	2	1	0	0	5	0	0	3	0	0	0	0	0
3	C - Manufacturing	4,119	741	334	16	9	4	0	1,101	0	65	44	-19	-1	-17
4	D - Electricity, gas, steam and air conditioning supply	3,307	0	0	0	0	0	0	0	0	0	0	0	0	0
5	E - Water supply; sewerage, waste management and remediation activities	70	53	4	14	0	5	0	0	70	3	1	0	0	0
6	F - Construction	848	101	0	1	0	4	0	102	0	96	0	0	0	0

ALPHA BANK

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Variable: Geographical area subject to climate change physical risk - acute and chronic events	Gross carrying amount (Mln EUR)													
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,177	0	0	0	0	0	0	0	0	0	0	0	0	0
8	H - Transportation and storage	5,178	0	0	0	0	0	0	0	0	0	0	0	0	0
9	L - Real estate activities	1,850	54	1	0	0	2	55	0	0	12	0	0	0	0
10	Loans collateralised by residential immovable property	6,912	72	60	145	202	18	227	239	13	91	54	-13	-2	-10
11	Loans collateralised by commercial immovable property	6,985	364	203	226	82	9	278	597	0	123	20	-8	-2	-5
12	Repossessed colalterals	236	0	0	0	22	21	12	10	0	0	0	0	0	0
13	Other relevant sectors (breakdown below where relevant)	0	0	0	0	0	0	0	0	0	0	0	0	0	0

11.3.6,7,8,9,10 Summary of GAR KPIs on Taxonomy aligned exposures and Other climate change mitigating actions that are not covered in the EU Taxonomy

On May 22, 2025, the European Banking Authority (EBA) launched a public consultation regarding amendments to the Implementing Regulation on Pillar III disclosures, focusing on the simplification of Environmental, Social, and Governance (ESG) disclosures. A key proposal from the EBA is the suspension of disclosure obligations for templates 6 to 10, which include the Green Asset Ratio (GAR) and the Banking Book Taxonomy Alignment Ratio (BTAR), for large and listed institutions until December 31, 2026. This suspension is part of the European Commission's Omnibus I package, which revises the EU Taxonomy framework.

The EBA's consultation paper established that the suspension would take effect from the publication date, with the first reference date set for June 30, 2025. On August 6, 2025, the EBA issued a no-action letter advising national competent authorities not to prioritize the enforcement of these disclosure obligations during the transitional period.

In light of these developments, Alpha Bank has decided to refrain from publishing templates 6 to 10 of the ESG Pillar III disclosures until December 31, 2026.

Appendix I – Own Funds structure

Template 43: EU CC1 - Composition of regulatory own funds as of 30.06.2025

(Amounts in millions of Euro)

		a	a	b
		30.06.2025	**31.12.2024**	**Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation**
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	6.581	5.466	(a)
2	Retained earnings	1.900	1.462	(b)
3	Accumulated other comprehensive income (and other reserves)	(186)	(92)	(c)
EU-3a	Funds for general banking risk	-	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1			
5	Minority interests (amount allowed in consolidated CET1)	-	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	253	358	(b)
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**8.548**	**7.195**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	(4)	(4)	
8	Intangible assets (net of related tax liability) (negative amount)	(336)	(412)	(d)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(246)	(2)	(e)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	162	172	(c)
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	-	
15	Defined-benefit pension fund assets (negative amount)			
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	(225)	(85)	(a)

		a	a	b
		30.06.2025	31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(85)	(88)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c	of which: securitisation positions (negative amount)	(85)	(88)	
EU-20d	of which: free deliveries (negative amount)	-	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(1.696)	(1.703)	(e)
22	Amount exceeding the 17,65% threshold (negative amount)	-	-	(e,g)
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	-	(g)
25	of which: deferred tax assets arising from temporary differences	-	-	(e)
EU-25a	Losses for the current financial year (negative amount)	-	-	(b)
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a	Other regulatory adjustments	(221)	(151)	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**(2.652)**	**(2.274)**	

		a	a	b
		30.06.2025	31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
29	**Common Equity Tier 1 (CET1) capital**	**4.921**	**4.921**	
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts	700	700	
31	of which: classified as equity under applicable accounting standards	700	700	
32	of which: classified as liabilities under applicable accounting standards	-	-	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) CRR	-	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1			
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1			
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties			
35	of which: instruments issued by subsidiaries subject to phase out			
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**700**	**700**	
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)			
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)			
42a	Other regulatory adjustments to AT1 capital	-		
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**	**-**	
44	**Additional Tier 1 (AT1) capital**	**700**	**700**	(h)

		a	a	b
		30.06.2025	31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
45	**Tier 1 capital (T1 = CET1 + AT1)**	**5.621**	**5.621**	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	1.017	1.011	(f)
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	-	
EU-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	-	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	-	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties			
49	of which: instruments issued by subsidiaries subject to phase out			
50	Credit risk adjustments	-	-	
51	**Tier 2 (T2) capital before regulatory adjustments**	**1.017**	**1.011**	
Tier 2 (T2) capital: regulatory adjustments				
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)			
53	Direct, indirect and synthetic goldings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	-	
EU-56b	Other regulatory adjustments to T2 capital	-		
57	Total regulatory adjustments to Tier 2 (T2) capital	-	-	
58	Tier 2 (T2) capital	1.017	1.011	

		a	a	b
		30.06.2025	31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
59	**Total capital (TC = T1 + T2)**	**6.638**	**6.632**	
60	**Total Risk exposure amount**	**30.604**	**30.279**	
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	16,1%	16,3%	
62	Tier 1 (as a percentage of total risk exposure amount)	18,4%	18,6%	
63	Total capital (as a percentage of total risk exposure amount)	21,7%	21,9%	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	9,90%	9,88%	
65	of which: capital conservation buffer requirement	2,50%	2,50%	
66	of which: countercyclical buffer requirement	0,21%	0,19%	
67	of which: systemic risk buffer requirement	0,00%	0,00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	1,00%	1,00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1,69%	1,69%	
68	**Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)**	9,89%	10,07%	
Amounts below the thresholds for deduction (before risk weighting)				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	87	72	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	37	45	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	684	678	
Applicable caps on the inclusion of provisions in Tier 2				

		a	a	b
		30.06.2025	31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)			
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)				
80	Current cap on CET1 instruments subject to phase out arrangements	-	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-	

ALPHA BANK

Appendix II – Net Stable Funding Ratio

Template 44a: EU LIQ2: Net Stable Funding Ratio as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**8.115**	**150**	**9**	**987**	**9.101**
2	*Own funds*	8.115	150	9	987	9.101
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**35.789**	**1.726**	**11**	**34.922**
5	*Stable deposits*		22.154	788	5	21.800
6	*Less stable deposits*		13.635	938	6	13.122
7	Wholesale funding:		**18.292**	**1.187**	**2.338**	**8.549**
8	*Operational deposits*		325	-	-	162
9	*Other wholesale funding*		17.967	1.187	2.338	8.387
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**0**	**1.121**	**-**	**26**	**26**
12	*NSFR derivative liabilities*	0				
13	*All other liabilities and capital instruments not included in the above categories*		1.121	-	26	26
14	**Total available stable funding (ASF)**					**52.598**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**375**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**4.705**	**2.189**	**33.970**	**30.744**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		467	1	258	306
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.969	1.980	20.339	24.095
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		234	129	2.364	5.026
22	*Performing residential mortgages, of which:*		175	173	6.008	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		135	146	4.873	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		94	35	7.365	6.343
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**1.810**	**44**	**9.519**	**10.156**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	274	233
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		707			35
31	*All other assets not included in the above categories*		1.104	44	9.245	9.888
32	Off-balance sheet items		**490**	**976**	**4.707**	**730**
33	**Total RSF**					**42.006**
34	**Net Stable Funding Ratio (%)**					**125%**

Template 44b: EU LIQ2: Net Stable Funding Ratio as of 30.09.2024

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**7.915**	**141**	**1**	**983**	**8.898**
2	*Own funds*	7.915	141	1	983	8.898
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**37.048**	**2.300**	**35**	**36.640**
5	*Stable deposits*		22.806	1.045	16	22.675
6	*Less stable deposits*		14.242	1.255	19	13.966
7	Wholesale funding:		**19.322**	**389**	**2.703**	**9.004**
8	*Operational deposits*		302	-	-	151
9	*Other wholesale funding*		19.020	389	2.703	8.853
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**27**	**1.405**	**-**	**24**	**24**
12	*NSFR derivative liabilities*	27				
13	*All other liabilities and capital instruments not included in the above categories*		1.405	-	24	24
14	**Total available stable funding (ASF)**					**54.566**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**376**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**4.808**	**2.727**	**34.424**	**31.051**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		630	5	231	297
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.757	2.453	19.428	24.477
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		175	172	2.512	6.079
22	*Performing residential mortgages, of which:*		248	198	7.523	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		197	169	6.292	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		173	71	7.242	6.277
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**2.136**	**19**	**9.309**	**9.971**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	240	204
29	*NSFR derivative assets*		27			27
30	*NSFR derivative liabilities before deduction of variation margin posted*		786			39
31	*All other assets not included in the above categories*		1.322	19	9.069	9.700
32	Off-balance sheet items		**673**	**1.005**	**4.506**	**727**
33	**Total RSF**					**42.124**
34	**Net Stable Funding Ratio (%)**					**130%**

Template 44c: EU LIQ2: Net Stable Funding Ratio as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**7.555**	**-**	**-**	**1.097**	**8.652**
2	*Own funds*	7.555	-	-	1.097	8.652
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**35.642**	**2.985**	**178**	**36.122**
5	*Stable deposits*		22.315	1.281	80	22.496
6	*Less stable deposits*		13.327	1.704	98	13.625
7	Wholesale funding:		**19.286**	**386**	**2.641**	**8.355**
8	*Operational deposits*		287	-	-	143
9	*Other wholesale funding*		18.999	386	2.641	8.212
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**115**	**1.225**	**-**	**24**	**24**
12	*NSFR derivative liabilities*	115				
13	*All other liabilities and capital instruments not included in the above categories*		1.225	-	24	24
14	**Total available stable funding (ASF)**					**53.152**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**351**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**4.594**	**2.424**	**33.858**	**30.320**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		613	8	246	311
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.506	2.134	18.775	23.659
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		176	155	2.487	6.074
22	*Performing residential mortgages, of which:*		258	191	7.548	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		209	163	6.316	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		217	92	7.289	6.350
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**2.277**	**48**	**9.603**	**10.338**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	209	177
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		863			43
31	*All other assets not included in the above categories*		1.414	48	9.395	10.118
32	Off-balance sheet items		**460**	**1.013**	**4.387**	**743**
33	**Total RSF**					**41.752**
34	**Net Stable Funding Ratio (%)**					**127%**