Alpha Bank S.A.

Pillar III Disclosures

On a consolidated basis

Report for September 30, 2025

Contents

ALPHA BANK

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

The Alpha Bank Group, (hereinafter the “Group”), which includes companies in Greece and abroad, offers the following services: corporate and retail banking, financial services, investment banking and brokerage services, insurance services, real estate management, hotel services. The Group is active in the Greek and international banking market, with presence in Cyprus, the United Kingdom and Luxemburg.

On 27 June 2025 the Group completed the Reverse Merger between Alpha Bank S.A (absorbing entity) and Alpha Services and Holdings (ASH, the absorbed entity) by the method of absorption, thus Alpha Bank becoming the ultimate parent company of the Group. In particular, the Absorbed Entity merged with Alpha Bank, through a merger by absorption, by way of consolidation of the assets and liabilities of the Merging Entities. The merger used the provisions of Article 16 of the Greek Law 2515/1997 and the provisions of Articles 7 to 21 and 140 of Greek Law 4601/2019 as amended and in force.

The completion of the Reverse Merger, was subject to obtaining all necessary regulatory authorisations and corporate approvals, including:

(i) the prior approval by the ECB (acting through the SSM with the bank of Greece) under Article 16 of the Greek Law 2515/1997 in conjunction with Articles 4 and 6 of the SSM Regulation, which was obtained on 30 May 2025;

(ii) the approval of the Ministry of Development, as well as

(iii) all necessary corporate approvals including those by the Extraordinary General Meeting of the Absorbed Entity held on 23 June 2025 and the Extraordinary General Meeting of the Absorbing Entity held on 12 June 2025.

Following the completion of the Reverse Merger, the assets and liabilities of the Absorbed Entity were transferred to Alpha Bank by way of universal succession and the shareholders of the Absorbed Entity became shareholders of Alpha Bank. Leading or parent entity of the Group is Alpha Bank S.A., has its registered office at 40 Stadiou Street, Athens and is listed in the General Commercial Register with registration number 159029160000. The Bank is subject to the Greek banking law and is supervised by the European Central Bank (ECB) and the Single Supervisory Mechanism (SSM). Its duration has been set until 2101 and can be extended following a decision of the General Assembly.

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.

On 4 November 2025, the EBA released several updates to ensure consistency with the latest regulatory and reporting framework developments. These include an updated Mapping Tool reflecting recent amendments to the Pillar 3 disclosure and supervisory reporting frameworks, as well as a new version of the Signposting Tool incorporating the revised requirements up to Reporting framework v4.0. Additionally, the EBA’s reporting Time Traveller platform has been enhanced to align with the most recent changes in regulatory reporting.

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.

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 third 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 Supervisory Review and Evaluation Process (SREP) decision, ECB notified Alpha Services and Holdings and as a result its universal successor after reverse merger Alpha Bank S.A., that for Q3 2025 it is required to meet the minimum limit for consolidated Overall Capital Requirements (OCR), of at least 14.71% (OCR includes for Q3 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.

On October 2025 Alpha Bank S.A. received the SREP decision 2025 regarding the Capital Requirements for the year 2026. The additional supervisory requirements for Pillar II (P2R) will stand at 2.9%, decreased by 0.1% compared to 3% currently in force.

Minimum Requirement for Own Funds and Eligible Liabilities (MREL)

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 September 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 30.09.2025.

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 September 2025, the Bank's MREL ratio stood at 28.3%, which is above the binding target of 27.28% of the Total Risk Exposure Amount (TREA) (effective from 30.06.2025, including CBR). The ratio includes the profit of the financial reporting period that ended on 30 September 2025 post a provision for dividend payout.

[1] Market Confidence Charge

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.

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Main elements regarding Asset Quality, Capital and Liquidity

- ✓ The NPE stock in Greece increased by €72mn q/q due to retail inflows, bringing the total stock slightly up to 1.4bn at the end of Q3 2025. As a result, the Group NPE ratio stood at 3.6%. The Group's NPE cash coverage stood at 55% at the end of Q3, while total coverage including collateral reached 131%. The Group NPL coverage ratio stood at 82%, while total coverage including collateral reached 156%.
- ✓ The Group's CET 1 Capital base stood at €5.0bn, resulting in CET1 ratio of 16.0%, in the quarter including the profit of the financial reporting period that ended on 30 September 2025 as well as the impact of DTC acceleration.
- ✓ The Group's Loan-to-Deposit ratio stands at 79%, while the Group's Liquidity Coverage Ratio (LCR) stood at 195% (+1% q/q), far exceeding regulatory thresholds and management targets.
- ✓ As of September 2025, ECB financing stood at €2.3bn. The Bank's blended funding cost decreased to 97 bps in the quarter, down from 109bps in Q2 2025, due to lower deposit and wholesale funding costs.
- ✓ On 27 January 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. The full integration of FLEXFIN LTD was completed in Q3 2025.
- ✓ On 31.10.2025, the Group completed the acquisition of certain assets, liabilities and key operational personnel from AstroBank through its subsidiaries Alpha Bank Cyprus Ltd, Alpha Group Investments LTD and Alpha Credit Acquisition Company Ltd. The transaction is fully aligned with the Group's strategic objective of strengthening its market presence and financial position in Cyprus.
- ✓ On 16.12.2025 ,Alpha Bank S.A. together with its wholly owned subsidiary Alpha Finance Investment Services S.M.S.A. announced the successful completion of the acquisition of 100% of the issued share capital of AXIA Ventures Group Ltd following the satisfaction of all customary conditions, including the receipt of the applicable regulatory approvals. The completion of the Transaction follows the signing of the definitive share purchase agreement announced on 4 August 2025 and the earlier announcement of 31 March 2025 regarding the agreement on the key commercial and legal terms of the Transaction.
- ✓ On 23.10.2025, the Bank successfully completed the pricing of a Green Senior Preferred Bond of € 500 mn. The new 6-year bond, called after 5 years, carries a coupon of 3.125%.

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.

Alpha Bank S.A., in line with its announcement on 29.09.2025 regarding the interim dividend for the 2025 financial year, has distributed a total of €111 million in interim dividends to its shareholders on 05.12.2025.

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 30.09.2025, Group's CET1 stood at €5.0 billion and the total Regulatory Capital at €6.7billion, while the total RWAs amounted to €31.0billion resulting in a CET1 ratio of 16.0%, and total Capital Adequacy Ratio of 21.5% mainly due to the Q3 2025 profitability which includes also a provision for the distribution of an amount of Euro c.93million 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
	30.09.2025*	**30.06.2025***
Capital Type		
CET1	4,959	4,921
Tier 1 Capital	5,659	5,621
Tier 2 Capital	1,004	1,017
Total Regulatory Capital for C.A.R. calculation	6,664	6,638
Risk Weighted Assets	30,985	30,604
Capital Ratios		
CET1 Ratio	**16.0%**	**16.1%**
Tier 1 Ratio	**18.3%**	**18.4%**
Total Capital Ratio (Tier 1 + Tier 2)	**21.5%**	**21.7%**

(*) including period profits post a provision for 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 September 2025, the eligible amounts not "relying on future profitability" according to the CRD Directive stood at €2.30 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 (*)

(Amounts in millions of Euro)

		a	b	c	d	e
		30.09.2025	30.06.2025	31.03.2025	31.12.2024	30.09.2024
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	4.959	4.921	5.027	4.921	4.840
2	Tier 1 capital	5.659	5.621	5.727	5.621	5.540
3	Total capital	6.664	6.638	6.755	6.632	6.533
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	30.985	30.604	30.426	30.279	31.247
4a	Total risk exposure pre-floor	30.985	30.604	30.426		
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	16,01%	16,08%	16,52%	16,25%	15,49%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	16,01%	16,08%	16,52%		
6	Tier 1 ratio (%)	18,26%	18,37%	18,82%	18,56%	17,73%
6b	Tier 1 ratio considering unfloored TREA (%)	18,26%	18,37%	18,82%		
7	Total capital ratio (%)	21,51%	21,69%	22,20%	21,90%	20,91%
7b	Total capital ratio considering unfloored TREA (%)	21,51%	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)					

		a	b	c	d	e
		30.09.2025	30.06.2025	31.03.2025	31.12.2024	30.09.2024
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%	0,21%	0,19%	0,26%
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%	3,71%	3,69%	3,76%
EU 11a	Overall capital requirements (%)	14,71%	14,71%	14,71%	14,69%	14,76%
12	CET1 available after meeting the total SREP own funds requirements (%)	9,82%	9,89%	10,34%	10,07%	9,30%
	Leverage ratio					
13	Leverage ratio total exposure measure	75.738	74.581	74.323	71.684	74.198
14	Leverage ratio	7,47%	7,54%	7,71%	7,84%	7,47%
	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total					
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)	16.086	16.156	16.031	15.782	15.719
EU 16a	Cash outflows - Total weighted value	9.215	9.323	9.357	9.424	9.507
EU 16b	Cash inflows - Total weighted value	888	944	1.043	1.158	1.194
16	Total net cash outflows (adjusted value)	8.327	8.379	8.315	8.266	8.313
	Liquidity coverage ratio (%) (adjusted values) (**)	193,4%	193,1%	193,0%	191,0%	189,2%
17	Liquidity coverage ratio (%)	194,7%	194,0%	193,6%	203,2%	189,8%
	Net Stable Funding Ratio					
18	Total available stable funding	54.575	53.200	52.224	52.598	54.566
19	Total required stable funding	43.616	43.265	41.944	42.006	42.124
20	NSFR ratio (%)	125,1%	123,0%	124,5%	125,2%	129,5%

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

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

3.2 Own Funds Structure

The following table presents the analysis of Own funds structure:

Template 3: Own Funds Structure (*)

(Amounts in millions of Euro)

	30.09.2025	30.06.2025
Share capital	671	671
Share premium	5.909	5.909
Own shares	(228)	(225)
Retained Earnings and Other Reserves	768	838
o/w FVOCI reserves	1	2
Period results*	340	253
Common equity tier 1 capital before regulatory adjustments 1-5	**7.462**	**7.447**
1.PVA	(3)	(4)
2.Intangible assets	(365)	(336)
3.DTA amortization	(1.895)	(1.943)
4.Irrevocable payment commitment	(30)	(30)
5.Other adjustments	(209)	(213)
Total regulatory adjustments to common equity tier 1	**(2.502)**	**(2.526)**
Common equity tier 1 capital (CET1) (1)	**4.959**	**4.921**
Additional Tier I instruments	700	700
Additional Tier I before regulatory adjustments	**700**	**700**
Additional Tier I	**700**	**700**
Tier I Capital (CET1 + AT1)	**5.659**	**5.621**
Subordinated loan	1.004	1.017
Tier II capital before regulatory adjustments	**1.004**	**1.017**
Tier II capital	**1.004**	**1.017**
Total Capital (TC = Tier I + Tier II)	**6.664**	**6.638**
Total RWA	**30.985**	**30.604**
Common equity tier 1 Ratio	**16,0%**	**16,1%**
Tier I Ratio	**18,3%**	**18,4%**
Total Capital Ratio (Tier I + Tier II)	**21,5%**	**21,7%**

(*) Period results include 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 € 81 million as of September 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 € 96 million as of September 30, 2025, and, in accordance with ECB guidelines, were classified as non-performing exposures (NPE) and accordingly as Stage 3 loans.

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 standardised 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 4: EU OV1 – Overview of risk weighted exposure amounts [*]

(Amounts in millions of Euro)

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		30.09.2025	30.06.2025	30.09.2025
1	**Credit risk (excluding CCR)**	**26.161**	**25.595**	**2.093**
2	Of which the standardised approach	26.161	25.595	2.093
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**	**177**	**221**	**14**
7	Of which the standardised approach	165	193	13
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	8	8	1
9	Of which other CCR	4	20	0
10	Credit valuation adjustments risk - CVA risk	30	47	2
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	30	47	2
EU 10c	Of which the simplified approach	-	-	-
15	**Settlement risk**	**-**		**-**
16	**Securitisation exposures in the non-trading book (after the cap)**	**627**	**661**	**50**
17	Of which SEC-IRBA approach			-
18	Of which SEC-ERBA (including IAA)	246	253	20
19	Of which SEC-SA approach	380	408	30
EU 19a	Of which 1250%			-
20	**Position, foreign exchange and commodities risks (Market risk)**	**360**	**452**	**29**
21	Of which the Alternative standardised approach (A-SA)			
21a	Of which the Simplified standardised approach (S-SA)	172	169	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)	**1.812**	**1.802**	**145**
26	Output floor applied (%)	0	0	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	**Total**	**30.985**	**30.604**	**2.479**

[*] period profits are included

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 30.09.2025 on consolidated basis was 7.47%, including period profits, according to the transitional definition of Tier 1 capital, exceeding by 2.49 x 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 following table presents an analysis of the Group's leverage ratio:

Template 5: Summary information on leverage ratio

(Amounts in millions of Euro)

	a
	30.09.2025*
Summary information on leverage ratio	
Tier 1 capital	5,659
Leverage ratio total exposure measure	75,738
Leverage ratio	**7.47%**

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

5 Market Risk

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.

Alpha Bank calculates Value at Risk (VaR) for internal risk management purposes since 1999. 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. 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. Currently, the stress period used by the Bank is 23/03/2022-23/03/2023. The selection of the stressed period is based on the assessment of the most volatile period in recent history.

5.1 IMA approach for market risk

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.

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

Template 6a: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 30.09.2025

(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**	93	189	-	-	-	282	23
1a	*Regulatory adjustment [(1)]*	*63*	*145*	-	-	-	*208*	*17*
1b	*RWAs at the previous quarter-end (end of the day)*	*30*	*44*	-	-	-	*74*	*6*
2	Movement in risk levels	(9)	(16)	-	-	-	(24)	(2)
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	1	-	-	-	-	1	0
8a	*RWAs at the end of the disclosure period (end of the day)*	22	28	-	-	-	50	4
8b	*Regulatory adjustment [(1)]*	58	80	-	-	-	138	11
8	**RWAs at the end of the disclosure period**	80	109	-	-	-	189	15

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Template 6b: 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

[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.

6 Liquidity Risk

Definition

Liquidity risk is the risk arising from the Group's inability to meet its obligations as they become due, or fund new business, without incurring substantial losses as well as the inability to manage unplanned contraction or changes in funding sources. Liquidity risk also arises from the Group's failure to recognize or address changes in market conditions that affect the ability to liquidate assets quickly and with minimal loss in value. Liquidity risk is also a Balance Sheet risk, since it may arise from banking book activities.

6.1 Liquidity Coverage Ratio (LCR)

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 September 2025, the HQLA buffer stood at 17.2 billion and the Group LCR stood at 195%.

The following table provides a breakdown of the LCR as of 30 September 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 7: EU LIQ1: Quantitative information of LCR

(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)	**30.09.2025**	**30.06.2025**	**31.03.2025**	**31.12.2024**	**30.09.2025**	**30.06.2025**	**31.03.2025**	**31.12.2024**
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)**					**16.086**	**16.156**	**16.031**	**15.782**
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	37.535	37.811	38.105	38.369	2.319	2.308	2.293	2.259
3	*Stable deposits*	19.559	19.704	19.898	19.996	978	985	995	1.000
4	*Less stable deposits*	11.000	10.893	10.754	10.528	1.341	1.323	1.297	1.259
5	Unsecured wholesale funding	11.065	11.257	11.433	11.710	5.186	5.291	5.390	5.501
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	313	309	303	280	78	77	76	70
7	*Non-operational deposits (all counterparties)*	10.735	10.929	11.095	11.406	5.090	5.196	5.279	5.407
8	*Unsecured debt*	18	19	36	24	18	19	36	24
9	*Secured wholesale funding*					138	177	128	107
10	Additional requirements	1.284	1.306	1.318	1.323	589	589	600	599
11	*Outflows related to derivative exposures and other collateral requirements*	509	509	521	521	509	509	521	521
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	775	797	797	802	80	80	79	78
14	Other contractual funding obligations	293	290	295	311	293	290	295	311
15	Other contingent funding obligations	10.199	10.137	10.037	10.016	690	668	651	647
16	**TOTAL CASH OUTFLOWS**					**9.215**	**9.323**	**9.357**	**9.424**
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	87	113	149	149	-	1	8	8
18	Inflows from fully performing exposures	1.550	1.543	1.574	1.680	844	892	985	1.101
19	Other cash inflows	140	155	154	157	45	51	50	49
20	**TOTAL CASH INFLOWS**	**1.777**	**1.811**	**1.877**	**1.985**	**888**	**944**	**1.043**	**1.158**
EU-20c	*Inflows subject to 75% cap*	1.724	1.755	1.805	1.918	888	944	1.043	1.158
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					16.086	16.156	16.031	15.782
22	**TOTAL NET CASH OUTFLOWS**					**8.327**	**8.379**	**8.315**	**8.266**
23	LIQUIDITY COVERAGE RATIO					193%	193%	193%	191%